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<b>Title</b>	Regular update of Part-FCL — Regular update of Regulation (EU) No 1178/2011 regarding pilot training and licensing
<b>NPA Number</b>	NPA 2016-16

**UK CAA** (European.Affairs@caa.co.uk) has placed **6** unique comments on this NPA:

<b>Cmt#</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachments</b>
41	FCL.625 IR — Validity, revalidation and renewal	12	<p><b>Page No:</b> 12</p> <p>Paragraph No: FCL.625 IR – Validity, revalidation and renewal</p> <p><b>Comment:</b> The UK CAA proposes paragraph (1) should be amended as shown below.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> Amend to read as follows:</p> <p>“(1) where necessary, take sufficient refresher training at an ATO, to reach the level of proficiency needed to pass the instrument element of the skill test in accordance with Appendix 9 to this Part; and”</p>	
42	FCL.720.A Experience requirements and prerequisites for the issue of class or type ratings — aeroplanes	13	<p><b>Page No:</b> 13</p> <p><b>Paragraph No:</b> FCL.720.A Experience requirements and prerequisites for the issue of class or type ratings - aeroplanes</p> <p><b>Comment:</b> The UK CAA considers that to be able to comment on whether the revised requirements to allow 200 hours on TMGs or aeroplanes is reasonable, a definition needs to be added for ‘High performance non-complex aeroplane’.</p> <p><b>Justification:</b> To allow for a comparison of the aeroplanes capabilities and handling.</p> <p><b>Proposed Text:</b> Add a definition for a ‘High Performance non-complex aeroplane’ to the definitions in FCL.010.</p>	
43	Aa. IR(A) — Competency-based modular flying training course	13	<p><b>Page No:</b> 13</p> <p><b>Paragraph No:</b> Appendix 6, Aa. IR(A) – Competency based modular flying training course</p> <p><b>Comment:</b> UK CAA proposes paragraph (b) should be amended, to allow the candidate to take a written test to demonstrate theoretical knowledge, if preferred.</p> <p><b>Justification:</b> A written test ensures a degree of standardisation that is difficult to attain when left to individual FE’s. A written test is less likely to be challenged for inconsistency. Some candidates may prefer to have the time to concentrate that is provided by a written test. Expecting a candidate to demonstrate their theoretical knowledge <i>during</i> a skill test may be exerting too much pressure resulting in a poorer performance than the candidate is actually capable of.</p>	

			<p><b>Proposed Text:</b> Amend to read:</p> <p>“(b) verbally or in a written examination demonstrate to the examiner during the skill test that he/she has acquired an adequate level of theoretical knowledge of air law, meteorology and flight planning and performance (IR); and”</p>	
44	3.2. Draft AMC and GM (Draft EASA Decision) — 3.2.1. AMC/GM to Part FCL — AMC1 FCL.625(c) IR — Validity, revalidation and renewal	21	<p><b>Page No:</b> 21</p> <p><b>Paragraph No:</b> AMC 1 FCL.625(c) IR – Validity, revalidation and renewal</p> <p><b>Comment:</b> The last sentence in paragraph (a) states ‘The amount of training needed to reach the desired level of competence should increase with the time elapsed since the privileges of the rating were last used.’</p> <p>We believe that this is too prescriptive, the decision is for the ATO to evaluate and develop a training programme for the applicant. It is likely that the amount of training will increase with elapsed time, but this is not a certainty.</p> <p><b>Justification:</b> Proportionality.</p> <p><b>Proposed Text:</b> Amend to read as follows:</p> <p>“The amount of training needed to reach the desired level of competence may increase as required based on any of the factors identified above.”</p>	
45	GM2 FCL.900(c)(1) Instructor certificates	35	<p><b>Page No:</b> 35</p> <p><b>Paragraph No:</b> GM2 FCL.900(c)(1) – Instructor Certificates</p> <p><b>Comment:</b> The addition of wording “The competent authority <b>should</b>”, is inappropriate as it is a decision for the competent authority to decide if the Instructor is competent, based on the information provided by the ATO.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> Amend to read as follows:</p> <p>“The competent authority can issue an unrestricted flight instructor (FI)(A) or FI(H) certificate to an applicant that has 100 hours of experience in flight instruction and 25 hours in solo-flight supervision and is deemed competent by the ATO, and the FIE who conducted the AoC states that the instructor is competent.”</p>	
46	GM1 to Appendix 6 Modular training courses for the IR, Aa. IR(A)(8)	36 - 47	<p><b>Page No:</b> 36</p> <p><b>Paragraph No:</b> GM1 to Appendix 6 Modular training courses for the IR, Aa. IR(A)(8)</p> <p><b>Comment:</b> We believe the introductory paragraph “The following provides a list of Learning Objectives (LOs) ... demonstration of knowledge” should be amended to read as shown below:</p> <p><b>Justification:</b> Clarity.</p>	

**Proposed Text:** Amend to read as follows:

“The following provides a list of Learning Objectives for consideration by the Examiner to establish the applicants competence and level of knowledge:”.