



European Union Aviation Safety Agency
Comment-Response Document 2014-29(B)

RELATED NPA 2014-29(B)— RMT.0188 (FCL.002(A)) — 18.3.2020

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1. Summary of the outcome of the consultation

With this document, detailed answers to the comments received on NPA 2014-29(B) are provided. For a summary of the comments, please refer to Section 2.3 of the Explanatory Note to ED Decision 2020/005/R.



2. Individual comments and responses

In responding to the comments, a standard terminology has been applied to attest the European Aviation Safety Agency's (EASA's) position:

- (a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — EASA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the existing text is considered to be necessary.
- (d) **Not accepted** — The comment or proposed amendment is not agreed by EASA.

(General Comments)

comment	9	comment by: <i>EUROCONTROL</i>
	The EUROCONTROL Agency does not have any comment on NPA 2014-29 (B).	
response	Noted	

comment	13	comment by: <i>René Meier, Europe Air Sports</i>
	<p>Europe Air Sports, particularly supported by its member organisations European Gliding Union, European Powered Flying Union, PPL/IR, held a workshop on the entire set of NPA-2014-29. Our comments also reflect positions of several national organisations as the Aero-Club of Switzerland, CNFAS France, the German Aero Club, the Norwegian Air Sports Federation (NLF), the Finnish Aeronautical Association.</p> <p>We thank the Agency for the preparation of this part of the NPA. It was, however, difficult to deal with this NPA as it includes changes only. This makes the correct interpretation of a change highly difficult as three documents had to be consulted in parallel.</p>	
response	Noted	

comment	37	comment by: <i>Austro Control</i>
	<p>B. Comments to NPA 2014-29 (B) – AMC/GM to regulation 1178/2011</p> <p>1. New GM2 FCL.010 – Availability of FSTD</p> <p>Please refer to Austria's comment to FCL.010 above.</p>	



2. New AMC1 FCL.140 Recency requirements; FCL.740.A (b) (1) (iii) Revalidation of class and type ratings – aeroplanes

Comment

This comment is to be read in connection with Austria's comment to FCL.035 (a) (2) above. This new AMC is not fully in line with the new FCL.035 (a) (2) which limits crediting to certain types of Annex II aircraft, whereas this new AMC does not further specify types of aircraft.

Justification:

We assume that the purpose of this new AMC is to grant credits for Annex II aircraft matching with ICAO standards. The new rule FCL.035 (a) (2) wants to specify which types of Annex II aircraft can be subject to crediting of flight time. Some types of Annex II aircraft, in particular ultralight aeroplanes, are excluded from FCL.035 (a) (2). On the contrary, this new AMC does not exclude any kind of aircraft, because it neither refers to Annex II of the Basic Regulation nor does it contain a list of certain types of Annex II aircraft concerned, like FCL.035 does. Following the explicit wording of this new AMC, flight time on any aircraft can be credited as long as the aircraft is registered in an ICAO Contracting State. Matching ICAO standards is obviously not required. Austria is an ICAO Contracting State. Any ultralight aeroplane registered in Austria therefore is an "aircraft registered in an ICAO Contracting State". In addition, any other aircraft (e.g. gyroplanes) would fall under this provision.

Summing up: Following this AMC, crediting on ultralight aeroplanes and other types of Annex II aircraft is possible, whereas FCL.035 is limiting crediting possibilities in this field. FCL.035 (a) (2) and this new AMC are not fully in line, but this reveals the intention of the creators of this AMC to allow crediting of ultralight flight time which would be in the interest of General Aviation and is not to be seen as a safety issue. As described above in Austria's comment to FCL.035 (a) (2), Art 4 of the Basic Regulation is not necessarily to be understood in such way that it would make such crediting impossible.

Still there are aircraft where this unlimited crediting would not be in the interest of aviation safety. Crediting e.g. with regard to ultralight aeroplanes should be limited to aerodynamically controlled ultralight aeroplanes.

Proposal:

Amend this AMC to be in line with FCL.035 (a) (2) in its amended version (as proposed by Austria above).

response

Comment No. 1: noted.

Comment No. 2: partially accepted.

Point FCL.035 is not amended through this rulemaking task (RMT). The AMC regarding point FCL.140 on recency requirements and FCL.740.A, point (b)(1)(ii) on revalidation of class and type ratings were modified to allow hour credits from



ultralight aircraft to be used for maintaining the privileges for touring motor gliders (TMGs) and single-engine piston (SEP) aircraft as well as for the revalidation of class and type ratings.

comment

61

comment by: UK CAA

In responding to NPA 2014-29 (B) the UK CAA would also like to take the opportunity to suggest some further amendments to the existing AMC that we believe it would be beneficial to consider. Please see the comments below which we hope you find helpful.

UK CAA comment on NPA 2014-29 (B)

NPA 2014 - 29 (B) - Existing AMC & GM

Existing AMC material to be Amended

Commentor:	UK CAA
Page No: 49	
Paragraph No: AMC2 FCL.125 LAPL (e) Section 2 Item o	
Comment: The term 'Autorotative landing' is not used in the flight syllabus where it is referred to as a 'simulated engine off landing'.	
Justification: Clarity.	
Proposed Text: Replace 'Autorotative landing' with "Simulated engine off landing".	

EASA response to comment No. 61.1: not accepted.

The term 'autorotative landing' is used for the type rating (TR) training and therefore, for consistency reasons, the same wording is used.

Commentor:	UK CAA
Page No: 49	
Paragraph No: AMC2 FCL.125 LAPL (e) Section 2 Item q	
Comment: It is not clear that the 'Power checks, reconnaissance technique, approach and departure technique' refer to the confined area.	
Justification: Clarity.	
Proposed Text: "Confined area power checks, reconnaissance technique, approach and departure technique".	

EASA response to comment No. 61.2: not accepted.

The text is the same as the rule for the skill test for the commercial pilot licence for helicopters (CPL(H)) and for consistency reasons, it should stay the same for the skill



test for the light aircraft pilot licence for helicopters (LAPL(H)) and private pilot licence for helicopters (PPL(H)).

Commentor:	UK CAA
Page No: 68	
Paragraph No: AMC1 FCL.110.H LAPL(H) (b)(1)(viii)	
Comment: The UK CAA recommends that the term 'touchdown autorotation' be removed.	
Justification: 'Touchdown autorotation' is an American term used to describe a simulated engine off landing which is already mentioned in this paragraph. There is not a flight exercise or definition in Part-FCL that refers to touchdown autorotation.	
Proposed Text: Delete 'touchdown autorotation'.	

EASA response to comment No. 61.3: noted.

The proposal will be considered in future RMTs.

Commentor:	UK CAA
Page No: 68	
Paragraph No: AMC1 FCL.110H LAPL(H) (b)(2)	
Comment: The statement 'Before allowing the applicant to undertake his/her first solo flight, the FI should ensure that the applicant can operate the required systems and equipment' is different to the statement used for the PPL (H) syllabus. This states 'Before allowing the applicant for a PPL(H) to undertake his/her first solo flight, the FI should ensure that the applicant can use R/T communication'.	
Justification: Consistency - Amend LAPL(H) syllabus to include R/T	
Proposed Text: "Before allowing the applicant to undertake his/her first solo flight, the FI should ensure that the applicant can use the R/T communication and operate the required systems and equipment".	

EASA response to comment No. 61.4: accepted.

The text is amended accordingly.

Commentor:	UK CAA
Page No: 173	
Paragraph No: AMC2 FCL.235 (e) Section 2 Item q	
Comment: It is not clear that the 'Power checks, reconnaissance technique, approach and departure technique' refer to the confined area.	

Justification: Clarity.

Proposed Text: “**Confined area** power checks, reconnaissance technique, approach and departure technique”.

EASA response to comment No. 61.5: not accepted.

See EASA response to comment No. 61.2.

Commentor:

UK CAA

Page No: 187

Paragraph No: AMC1 FCL.210H PPL(H) (c)(1)(viii)

Comment: The UK CAA recommends that the term ‘touchdown autorotation’ be removed.

Justification: ‘Touchdown autorotation’ is an American term used to describe a simulated engine off landing which is already mentioned in this paragraph. There is not a flight exercise or definition in Part-FCL that refers to touchdown autorotation.

Proposed Text: Delete ‘touchdown autorotation’.

EASA response to comment No. 61.6: not accepted.

See EASA response to comment No. 61.3.

Commentor:

UK CAA

Page No: 188

Paragraph No: AMC1 FCL.210.H PPL(H) (c) (2)

Comment: The statement ‘Before allowing the applicant for a PPL(H) to undertake his/her first solo flight, the FI should ensure that the applicant can use R/T communication’ is different to the statement used in the LAPL syllabus. This states: ‘Before allowing the applicant to undertake his/her first solo flight, the FI should ensure that the applicant can operate the required systems and equipment’.

Justification: Consistency. Amend PPL(H) syllabus to include ‘systems and equipment’.

Proposed Text: “Before allowing the applicant to undertake his/her first solo flight, the FI should ensure that the applicant can use the R/T communication **and operate the required systems and equipment**’.

EASA response to comment No. 61.7: accepted.

See EASA response to comment No. 61.4.



The amendments to the existing Appendix 3 are required for updating airline transport pilot licence (ATPL)/CPL courses to bring them in line with ICAO and Part-FCL LAPL/PPL courses and the related AMC.

Commentor:	UK CAA
Page No: 511, 514, 517, 520, 522	
Paragraph No: AMC1 to Appendix 3 Training Courses for the issue of CPL and an ATPL - Flying Training paragraphs for ATP/IR, ATP integrated, CPL/IR, CPL integrated, and CPL modular course.	
Comment: It is recommended that Threat and Error Management (TEM) should be included as a requirement.	
Justification: ICAO requirement 2.4.4.2 <i>Flight instruction</i> states: “The applicant shall have received dual instruction in helicopters from an authorized flight instructor. The instructor shall ensure that the applicant has operational experience in at least the following areas to the level of performance required for the commercial pilot: a) <u>recognize and manage threats and errors;</u> ”	
Proposed Text: Include the text from PPL Flying syllabus in the other syllabi – “The flight instruction syllabus should take into account the principles of threat and error management”.	

EASA response to comment No. 61.8: accepted.

Commentor:	UK CAA
Page No: 511, 514, 517, 520, 522	
Paragraph No: AMC1 to Appendix 3 Training Courses for the issue of CPL and an ATPL - Flying Training paragraphs for ATP/IR, ATP integrated, CPL/IR, CPL integrated, and CPL modular course.	
Comment: It is recommended that DVE is included in the above syllabi.	
Justification: Continued flight into DVE is the biggest causes of helicopter accidents and it is specifically mentioned in the PPL/LAPL course.	
Proposed Text: Use the following text from PPL Flying syllabus – “GROUND TRAINING Enhanced ground instruction in weather interpretation, planning and route assessment, decision making on encountering DVE including reversing course or conducting a precautionary landing.	



Wherever possible, flight simulation should be used to demonstrate to student pilots the effects of flight into DVE and to enhance their understanding and need for avoidance of this potentially fatal flight regime”.

EASA response to comment No. 61.9: not accepted.

The proposed text is covered in the flight instructor (FI) syllabus.

Commentor:	UK CAA
Page No: 511, 514, 517, 520, 522	
Paragraph No: AMC1 to Appendix 3 Training Courses for the issue of CPL and an ATPL -	
Flying Training paragraphs for ATP/IR, ATP integrated, CPL/IR, CPL integrated, and CPL modular course.	
Comment: It is recommended that GNSS is included in the above syllabus.	
Justification: GNSS is now an element of the LAPL/PPL course.	
Proposed Text: Use the following text similar to PPL Flying syllabus –	
“Cross-country flying using dead reckoning, <u>GNSS</u> and radio navigation aids, flight planning by the applicant, filing of ATC flight plan, evaluation of weather briefing documentation, NOTAM, etc., R/T procedures and phraseology, positioning by radio navigation aids; operation to, from and transiting controlled aerodromes, compliance with ATS procedures for VFR flights, simulated radio communication failure, <u>simulation of deteriorating weather conditions and actions to divert or conduct precautionary landing</u> ; diversion procedures; location of an off airfield landing site and simulated approach”.	

EASA response to comment No. 61.10: not accepted.

The proposed text is part of the new learning objectives (LOs).

Commentor:	UK CAA
Page No: Part FCL 511, 514, 517, 520, 522	
Paragraph No: AMC1 to Appendix 3 Training Courses for the issue of CPL and an ATPL -	
Flying Training paragraphs for ATP/IR, ATP integrated, CPL/IR, CPL integrated, and CPL modular course.	
Comment: It is recommended that Loss of Tail Rotor Effectiveness (LTE) is included in the above syllabi.	
Justification: LTE has been identified as one of the major causes of helicopter accidents and is now included in the LAPL/PPL syllabus.	



Proposed Text: Include in all visual flying syllabi “Loss of tail rotor effectiveness (LTE)”.

response EASA response to comment No. 61.11: not accepted.

The proposed text is covered in the new LOs.

For the other UK CAA individual comments, see EASA responses underneath each individual comment above.

comment **64** comment by: *René Meier, Europe Air Sports*

May we add as a general remark that navigation means change rapidly these days, NDB's and VOR's disappear, VOR/DME approaches are replaced by GNSS approaches. Training and exams therefore has to be adapted to this reality.

Rationale:

We think it is a waste of time and money if one would insist on such training sessions and exams when they are of very limited or no practical use at all.

response Noted

This issue was dealt with through RMT.0256 that provided for amendments in the instrument rating (IR) training, testing, and checking. The amendments to the rule text were adopted with Regulation (EU) No 2016/539 amending Regulation (EU) No 1178/2011.

comment **70** comment by: *Light Aircraft Association*

The Light Aircraft Association are the UK’s principal representative body for amateur-built and vintage light aircraft. Our history dates back to 1946, originally as the Ultralight Aircraft Association and more latterly the Popular Flying Association, and we are proud to have His Royal Highness, Prince Michael of Kent as patron.

We are a not-for-profit association, owned by our members, providing airworthiness services under direct delegation from the UK’s Civil Aviation Authority. We represent the aviation interests of over 8,000 pilot, amateur builder, vintage aircraft owner and enthusiast members, with over 2,500 operational aircraft, including 500 microlights and 100 autogyros, and another 1,700 aircraft under construction.

The LAA welcomes this consultation which addresses a number of issues associated with the increased administrative burden which General Aviation has experienced in recent years. However the following areas are not supported since there is no evidence to support the additional burden which is being placed on General Aviation:



response	<p>1. Content of the training flight for Class Rating Revalidation included in NPA 29(b)</p> <p>2. Additional Class Rating Instructor revalidation requirements included in NPA 29</p> <p>Further comments have been submitted at the relevant sections.</p> <p>Noted</p>
comment	<p>81 comment by: <i>The Finnish Aeronautical Association</i></p> <p>The NPA only includes changed items, which are taken out of context with their original placement in the FCL text. This makes the correct interpretation of the changes very difficult. For a good understanding, one now needs to have the original regulation also at hand in addition to the NPA.</p> <p>Recommendation:</p> <p>The NPA should preferably be structured so that it is sufficient to read only the NPA in order to understand the changes in their full context.</p>
response	<p>Noted</p>
comment	<p>89 comment by: <i>AOPA Finland</i></p> <p>Attachment #1</p> <p>Because NPA 2014-29(A) document was removed from CRT prior the official end of response time AOPA Finland has added into this attachment of this segment.</p>
response	<p>Noted</p> <p>Comment No. 3 from the attachment: not accepted.</p> <p>With reference to the standardisation visits that have been performed during the last 5 years, EASA has never received any complaints. Competent authorities have not identified any problems with the way that theoretical-knowledge (TK) examination procedures are used. Therefore, EASA did not amend this AMC.</p>
comment	<p>90 comment by: <i>Flygteoriskolan Barkarby AB</i></p> <p>AMC/GM Annex to ED Decision 2011/016/R:</p> <p>AMC1 FCL.025 Theoretical knowledge examinations for the issue of licences...</p> <p>...Only one attempt at each examination paper is allowed in one sitting.</p> <p>My comments:</p> <p>1. A very strange limitation as well. Let me set up a PPL scenario:</p>

	<p>A student commences a sitting taking an exam in Meteorology and fails, result: 70%. He/she then has to wait for a re-test for at least 11 days.</p> <p>Another student ends a sitting taking an exam in Meteorology and fails, result: 5%. He/she can then the take the retest theoretically the day after.</p> <p>Strange wouldn't you say? I would never sign up a student for an exam again whose result is 5% (not for a first attempt either) but it is theoretically possible.</p> <p>My suggestion:</p> <ol style="list-style-type: none"> 1. Either delete the limitation totally or 2. Set the limit to attempts to days between attempts, not connected to a sitting. Especially since the sitting limitation should be deleted.
response	<p>Not accepted</p> <p>With reference to the standardisation visits that have been performed during the last 5 years, EASA has never received any complaints. Competent authorities have not identified any problems with the way that TK examination procedures are used. Therefore, EASA did not amend this AMC.</p>

3. Proposed amendments — 3.1. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision)

p. 4

comment	<p>2</p> <p style="text-align: right;">comment by: BGA</p> <p>P6 of NPA2014-29B proposed AMC regarding recognition of Annex II flight time addresses a need across all aircraft. Unfortunately the heading refers only to aeroplanes. Sailplanes must be included.</p> <p><u>Recommendation</u></p> <p>The title of this AMC should reflect applicability to sailplanes.</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p>



3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 4-5
SUBPART A – GENERAL REQUIREMENTS

comment

3

comment by: *IAOPA (EUROPE)*

Observation	Proposed new text
IOPA (Europe) considers that the concept of theoretical examination 'sittings' is unreasonably disproportionate for private pilot licences and therefore proposes an amendment to AMC1 FCL.025 (e) as indicated.	(e) 'Sitting': a period of time established by the competent authority within which a candidate can take an examination for the issue of a commercial pilot licence, instrument rating (IR) or en route instrument rating (EIR). This period should not exceed 10 consecutive days. Only one attempt at each examination paper is allowed in one sitting.

response

Not accepted

With reference to the standardisation visits that have been performed during the last 5 years, EASA has never received any complaints. Competent authorities have not identified any problems with the way that theoretical-knowledge (TK) examination procedures are used. Therefore, EASA did not amend this AMC. However, the related point in the rule (FCL.025(b)) was amended to facilitate obtaining a PPL.

comment

15

comment by: *René Meier, Europe Air Sports*

3.1.1. Amendments to AMC/GM

p 4/38

"RPM" and "VOLMET" are not stated correctly.

Please write "revolutions per minute" for "RPM" and "Meteorological information for aircraft in flight".

Rationale:

To be in-line with ICAO Doc. 8400.

p 5/38

In AMC1 FCL.050 Recording of flight time

Many thanks for adding the "computerised format", this change is highly welcome. However, this should remain an additional option to be chosen by GA pilots on a



	<p>voluntary basis, and this should not require these GA pilots to collect and record dozens of data not directly related to the flight performed.</p> <p>Rationale:</p> <p>Data cemeteries are of no help and do not increase safety.</p>
response	<p>Partially accepted</p> <p>Revolutions per minute (RPM) and meteorological information for aircraft in-flight (VOLMET) are changed accordingly.</p> <p>All pilots may choose between paper records and electronic records; however, if they choose electronic records, they need to take the appropriate measures.</p>
comment	<p>20 comment by: DGAC France</p> <p><u>Subject:</u></p> <p>Availability of an FSTD (GM2 FCL.10 Definitions)</p> <p><u>Content of comment:</u></p> <p>With reference to criteria’s (e) to (g) given in the AMC, France considers that it is not the role of Authorities to <u>determine</u> whether a FSTD is available or not.</p> <p>The availability or non availability shall be based on the operator’s (ATO, AOC holder) statement established on the basis on its own assessment of suitable simulation devices.</p> <p>In the same approach, DGAC considers that mitigating measures, adapted to the intended training/checking program, should be <u>established</u> by the operator (ATO, AOC holder) and <u>accepted</u> by the Authority.</p> <p>To support this comment it should be reminded that ORA.GEN.200 (a) (3) states that the ATO is responsible of:</p> <p><i>“(3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;”</i></p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p>
comment	<p>21 comment by: DGAC France</p> <p><u>Subject:</u></p> <p>Recording of flight time (AMC1 FCL.050)</p> <p><u>Content of comment:</u></p>



response	<p>France fully supports the amendment that mentions the computerised format for recording of flight time.</p> <p>Noted</p>
comment	<p>30 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>Relevant Text: GM 2 FCL.010 – Availability of an FSTD</p> <p>Comment: The text gives the possibility for tests and training to be exempt from the use of simulator far too easily. With this wording, if the simulator is booked for a specific time slot, or if the operator has problems with the roster, it could be argued that it is not available. It is not promoting flight safety to allow one to not use a simulator, as all emergency training cannot be performed in the aircraft and it is associated with a higher risk to conduct training and tests in the aircraft.</p> <p>Proposal: Clarify bullet point (e) as to whether this would render a simulator, where the simulator operator only allows their own instructors, unavailable.</p> <p>Remove bullet point (g).</p>
response	<p>Not accepted</p> <p>When a flight simulator training device (FSTD) is not available or acceptable, mitigation measures must be agreed with the competent authority.</p>
comment	<p>36 comment by: <i>CAA of Poland representative</i></p> <p>1. Referring to page 4 concerning GM1 FCL.005 Scope para. (c) in Polish CAA's opinion the definition of inclusive or exclusive "or" is imprecise. In many cases the context of the whole article can be understood and interpreted differently depending on who is reading it and what is being considered.</p>
response	<p>Not accepted</p> <p>The definition is considered to be a courtesy and was agreed upon internally at EASA.</p>

comment

40

comment by: *artelegis*

1. Comment AMC1 FCL.050 (2):

I strongly support the intention to enable also private pilots to log their flights in a computerized format, if they wish to.

Reasons:

There is no justifying reason, why only commercial operators should have this option to electronically log the flights of their pilots. Therefore, due to Art. 3 of the German Constitution it would be an unconstitutional discrimination to treat commercial and private pilots differently in this matter.

2. Comment AMC FCL.050 (3):

Why is this clause restricted only to sailplanes, balloons and airships? I suggest, that all pilots may log only the relevant items according to their types of flights. I suggest the following sentence:

"All pilots have the option to use a suitable format which contains the relevant items mentioned in (a) and are allowed to log additional information of the specific type of operation."

Reasons:

A pilot who flies only Single Engine has no need to keep the item Multi Engine in his logbook. A pilot who is no instructor and never wants to become an instructor, has no need to keep the item "instructor time of flight" in his log book, and so forth.

To leave the relevant items up to the specific pilots and their specific types of flights facilitates the logging of flights and many of the paper log books on the market can be remained.

It would be of great negative impact if all private pilots will be furthermore forced to change their habits of logging their flights as well as to throw away their old log books and to buy new ones.

By the way: So far there is no paper log book on the German market, that fulfills the requirements of AMC1 FCL 050.

3. Comment:

It should be stated clear, that any log book can be remained in English or any other European language.

Reasons:

Pilots who don't speak English, should not be discriminated.

4. Comment:

I suggest the following clause:

"Pilots who have logged their flights in the past not according to all items mentioned in (a) but according to their national laws, do not have to change those entries in



	<p>their log books. This AMC shall be applied for all entries at least for all flights after 2016-01-01. It is up to the pilots, whether they totalize the specific times of past flights, estimate those or start a new log book item new with the time "00:00".</p> <p>Reasons:</p> <p>Pilots who have totalized only the Total Time of Flight for many years cannot be forced to totalize the other items of Times of Flight mentioned in (a). They should be given a reasonable way to change from their old habits of logging their flights to the new requirements standardized in this AMC.</p> <p>I kindly thank you for the consideration of my comments.</p>
response	<p>Partially accepted</p> <p>The text is amended accordingly: electronic format is an option for all pilots.</p> <p>The format of the logbook stems from the Joint Aviation Regulation for Flight Crew Licensing (JAR-FCL) that entered into force about 18 years ago.</p>
comment	<p>51 comment by: <i>Danish Transport Authority</i></p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Relevant Text: GM 2 FCL.010 – Availability of an FSTD</p> </div> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Comment: The text gives the possibility for tests and training to be exempt from the use of simulator far too easily. With this wording, if the simulator is booked for a specific time slot, or if the operator has problems with the roster, it could be argued that it is not available. It is not promoting flight safety to allow one to not use a simulator, as all emergency training cannot be performed in the aircraft and it is associated with a higher risk to conduct training and tests in the aircraft.</p> </div> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Proposal: Clarify bullet point (e) as to whether this would render a simulator, where the simulator operator only allows their own instructors, unavailable.</p> <p>Remove bullet point (g).</p> </div>
response	<p>Not accepted</p> <p>When an FSTD is not available or acceptable, mitigation measures must be agreed with the competent authority.</p>
comment	<p>54 comment by: <i>European Cockpit Association</i></p> <p>Commented text:</p> <p>GM2 FCL.010</p>

	<p>Availability of an FSTD</p> <p>ECA's Comments:</p> <p>Although we agree with the use of FSTD, this change importantly widens the definition so an FSTD will be “always” available. We have received complains from some crews that are forced to travel around the world seeking an FSTD, affecting duty and rest periods.</p>
response	<p>Not accepted</p> <p>The implementing rule (IR) contains new definitions of the terms ‘available’ and ‘acceptable’ that should provide a solution for this issue.</p>
comment	<p>62 comment by: <i>Ultramagic, S.A.</i></p> <p>The current ease of access to electronically-stored data and the fact that many balloon pilots keep a digital record of their flights/tracks leads us to consider the suitability of computerised logbook formats for balloons (for commercial air transport and for other types of flights). We don't see any reason why the balloons should not be included.</p> <p>This item has been discussed in the Balloon Workshop 13 May in EASA and a consensus was reached to apply for this in this NPA.</p>
response	<p>Accepted</p> <p>Electronic logbooks are an option for all pilots.</p>
comment	<p>68 comment by: <i>CAA Norway</i></p> <p>GM2 FCL.010 Definitions</p> <p>AVAILABILITY OF AN FSTD</p> <p>We believe it is not up to the competent authority to establish mitigating measures to ensure that the level of safety is maintained when conducting the test or check in an aircraft. This responsibility should rest with the ATO/operator and the examiner (PIC). However, the approval of conducting the test or check in an aircraft instead of an FSTD should rest with the competent authority.</p>
response	<p>Partially accepted</p> <p>The text is amended accordingly.</p> <p>The IR contains new definitions of the terms ‘available’ and ‘acceptable’ that should provide a solution for this issue.</p>

comment	71	comment by: <i>Light Aircraft Association</i>
	Amendment of FCL.050 is fully supported since it will assist those pilots who now maintain electronic logbooks.	
response	Noted	

3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 5-6 SUBPART B — LIGHT AIRCRAFT PILOT LICENCE — LAPL

comment	12	comment by: <i>René Meier, Europe Air Sports</i>
	A new AMC is added after GM1 FCL.135.A; FCL.135.H: page 6/38 The abbreviations used state "aircraft" and "helicopters", the title states "aeroplanes", the text states "All hours flown on any aircraft...". This has to be clarified. Rationale: The wording used is unclear.	
response	Accepted The text is amended accordingly.	

comment	72	comment by: <i>Light Aircraft Association</i>
	The LAA welcome and fully supports amendment of AMC1 FCL.140.A to include any aircraft registered in an ICAO Contracting State within the respective Part-FCL aircraft class, since this will assist those pilots who hold EASA licences to meet the relevant recency requirements, whether operating EASA or non-EASA aircraft worldwide.	
response	Noted	

comment	73	comment by: <i>Light Aircraft Association</i>
	The LAA do not support mandating the content of the training flight(s). Requirements for training flight items, to be based on elements from the proficiency check, were previously recommended in the UK via an AIC issued following the introduction of JAR-FCL. This was considered unsuccessful due to instructors misinterpreting the guidance and treating the flight as a "mini skill test". The UK CAA	

response	<p>subsequently allowed this AIC to expire. Further guidance was then issued via a CAA TRAININGCOM 01/2006.</p> <p>Whilst it is agreed that there is significant benefit in an appropriate briefing and structured training flight, it is considered more appropriate to allow the instructor sufficient latitude to tailor the training to the needs of the student by either removing this amendment completely or replacing it with a more general statement.</p> <p>Not accepted</p> <p>Stakeholders specifically requested to provide guidance for instructors on how to perform the training flight.</p>
comment	<p>80 comment by: <i>Uppvinden AB</i></p> <p>AMC1 FCL.140.A, FCL.740.A</p> <p>According to this text Annex II e) aircraft should also be included.</p> <p>Proposal of change is to include them in FCL.035 for non-commercial licenses.</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p>
comment	<p>82 comment by: <i>The Finnish Aeronautical Association</i></p> <p>AMC1 FCL.140.A Recency requirements; FCL.740.A(b)(1)(ii) Revalidation of class and type ratings — aeroplanes</p> <p><i>All hours flown on any aircraft registered in an ICAO Contracting State shall count in full towards fulfilling the hourly requirements of this Part as long as the aircraft matches the definition and criteria of the respective Part-FCL aircraft category as well as its class and type ratings.</i></p> <p>Recommendation:</p> <p>The interpretation of this should include also the use of Annex II homebuilt and vintage aircraft. (points (a)-(d) and (h) of Annex II), similar to the text in the FCL itself. Please clarify.</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p>

comment	<p>83 comment by: <i>The Finnish Aeronautical Association</i></p> <p>AMC1 FCL.140.A; Recency requirements; FCL.740.A(b)(1)(ii) Revalidation of class and type ratings — aeroplanes</p> <p>The body of this proposed AMC is welcome, it describes a need across all classes of licences. However, although the text uses the term ‘any aircraft’, the header limits it to aeroplanes.</p> <p>Sailplanes must be included.</p> <p>Recommendation:</p> <p>Sailplanes must be included.</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p> <p>A separate rule book is created for sailplanes and balloons.</p>

3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 6-11
SUBPART C — PRIVATE PILOT LICENCE (PPL), SAILPLANE PILOT LICENCE (SPL) AND BALLOON PILOT LICENCE (BPL)

comment	<p>14 comment by: <i>René Meier, Europe Air Sports</i></p> <p>Subpart C-PPL, SPL, BPL</p> <p>page 6/38</p> <p>Question: Do our training organisations now have to adapt all syllabi because of this change?</p> <p>Rationale:</p> <p>Up to now the SPL syllabus was used to train future LAPL(S) holders. Now it seems that we have to re-write our documents. This we are absolutely not inclined to do.</p>
response	<p>Noted</p> <p>A separate rulebook is created for sailplanes and balloons.</p>
comment	<p>24 comment by: <i>European Gliding Union</i></p> <p><u>EGU Comment</u></p> <p><u>AMC1 FCL.140.A; Recency requirements; FCL.740.A(b)(1)(ii) Revalidation of class and type ratings — aeroplanes</u></p>

	<p>The body of this proposed AMC is welcome, it describes a need across all classes of licences. However, although the text uses the term 'any aircraft', the header limits it to aeroplanes.</p> <p>Sailplanes must be included.</p> <p><u>Recommendation</u></p> <p>The Title of this AMC should be amended to read:</p> <p>AMC1 FCL.140.A; FCL.140.S; Recency requirements; FCL.740.A(b)(1)(ii) Revalidation of class and type ratings — aeroplanes</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p> <p>A separate rule book is created for sailplanes and balloons.</p>
comment	<p>27 comment by: <i>René Meier, Europe Air Sports</i></p> <p>New AMC added after GM1 FCL.135.A; FCL.135.H</p> <p>p 6/38</p> <p>The correct title should be:</p> <p>"AMC1 FCL.140.A; FCL.140.S; Recency requirements; FCL.740.A (b)(1)(ii) Revalidation of class and type ratings-aeroplanes."</p> <p>Rationale:</p> <p>Sailplanes must be included.</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p> <p>A separate rule book is created for sailplanes and balloons.</p>
comment	<p>41 comment by: <i>Schimmel</i></p> <p>Regarding FCL.740</p> <p>It makes no sense to limit the revalidation of a type rating or class rating to within the last 3 month immediatly preceding the expiry date.</p> <p>Furthermore it would even generate a higher level of flight safety if it would be possible to do proficiency checks within the period of validity.</p> <p>It was possible during the last years and had no negative effect. With that possibility rating holder where able to perform Proficiency checks when ever needed. (i.e.</p>

response	<p>longer absence due to work in foreign countries or medical treatment in a hospital at the period of experience u.a).</p> <p>It was also easier for companies to plan check rides. (shifting of checks due to high season or unavailability of simulators or Aircrafts)</p> <p>Not accepted</p> <p>This is regulated by the IR.</p>
comment	<p>63 comment by: René Meier, Europe Air Sports</p> <p>AMC1 FCL.140.A Recency requirements...Revalidation of class and type ratings aeroplanes.</p> <p>p 6/38</p> <p>There must be no interpretation possible when it comes to apply this provision: The relevant texts of the entire Part-FCL must be consistent.</p> <p>Rationale:</p> <p>Confusion prevention at the highest possible level.</p>
response	<p>Not accepted</p> <p>EASA considers this guidance on the content clear enough.</p>
comment	<p>85 comment by: The Finnish Aeronautical Association</p> <p>AMC1 FCL.810(b) night rating</p> <p>This night rating syllabus should also cover night training towards LAPL + NF. Now it only states that it is meant for PPL.</p> <p>Recommendation:</p> <p>After PPL, add words "and LAPL" so the headline would be NIGHT RATING FOR PPL AND LAPL.</p>
response	<p>Accepted</p> <p>The text is amended accordingly.</p>



3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 11
SUBPART F — AIRLINE TRANSPORT PILOT LICENCE — ATPL

comment

22

comment by: DGAC France

Subject:**ATPL prerequisites (AMC1 FCL.510.A (b) (1))****Content of comment:**

France is questioning the rationale behind deleting the AMC1 FCL.510.A (b) (1). We understand that the AMC cannot go beyond the regulation itself and FCL.510.A (b) (1).

FCL.510.A (b) (1) states that:

(b) Experience.

Applicants for an ATPL(A) shall have completed a minimum of 1 500 hours of flight time in aeroplanes, including at least:

*(1) 500 hours **in multi-pilot operations** on aeroplanes;*

The terms “multi-pilot operations” is defined in FCL.010:

‘Multi-pilot operation’:

*for aeroplanes, it means an operation **requiring at least 2 pilots** using multi-crew cooperation in either multi-pilot or single-pilot aeroplanes;*

The main question is which hours could be counted to comply with FCL.510.A (b) (1).

France considers that multi-pilot operations hours can be taken into account provided these hours have been performed in accordance with an approved operation manual or existing document deemed acceptable as equivalent.

France proposes to amend FCL.510.A (b) (1) in order to clarify the issue.

Proposed amendment (FCL.510.A (b) (1)):***FCL.510.A ATPL(A) — Prerequisites, experience and crediting***

(a) Prerequisites. Applicants for an ATPL(A) shall hold:

(1) an MPL; or

(2) a CPL(A) and a multi-engine IR for aeroplanes. In this case, the applicant shall also have received instruction in MCC.

(b) Experience. Applicants for an ATPL(A) shall have completed a minimum of 1500 hours of flight time in aeroplanes, including at least:



(1) 500 hours in multi-pilot operations on aeroplanes **performed in accordance with an approved operation manual or existing document deemed acceptable as equivalent;**

response Not accepted
The definitions provided in the IR already address this issue.

comment 42 comment by: Schimmel

Regarding FCL.740

It makes no sense to limit the revalidation of a type rating or class rating to within the last 3 month immediatly preceding the expiry date.

Furthermore it would even generate a higher level of flight safety if it would be possible to do proficiency checks within the period of validity.

It was possible during the last years and had no negative effect. With that possibility rating holder where able to perform Proficiency checks when ever needed. (i.e. longer absence tue to work in foreign countrys or medical treatment in a hospital at the period of expirience u.a).

It was also easier for companies to plan check rides. (shifting of checks tue to high season or unavailabiltiy of simulators or Aircrafts)

response Not accepted
This is regulated by the IR.

3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 11
SUBPART G — INSTRUMENT RATING — IR

comment 4 comment by: IAOPA (EUROPE)

Observation	Proposed new text
IAOPA (Europe) considers that the word 'undergo' implies an element of duress and recommends that the word should be changed to 'take' as indicated.	'(a) Paragraph (1) of FCL.625(c) determines that if the instrument rating has lapsed, the applicant shall undergo take refresher training at an ATO, to reach the level of proficiency needed to pass the instrument element of the skill test prescribed in Appendix 9 to Part-FCL. The amount of refresher training

	needed should be determined on a case-by-case basis by the ATO, taking into account the following factors:'
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response

Noted

This issue was dealt with through RMT.0587 that provided for amendments in the IR training, testing, and checking. These amendments to the AMC and GM were adopted with ED Decision 2017/022/R.

comment

10

comment by: *Estonian CAA*

AMC1 FCL.625(c) and AMC1 FCL.740(b)(1) are very similar (renewal of IR and class/type rating). Therefore it is unclear why in AMC1 FCL.740(b)(1) the first sentence has been deleted but in AMC1 FCL.625(c) the first sentence modified only.

response

Noted

The differences are due to linguistic input and a safety recommendation.

comment

17

comment by: *Martin PFEIFENBERGER*

Subpart G – Instrument Rating – IR

For helicopters: The wording does not include a statement for required refresher training in case that the applicant holds a valid IR(H) rating on another type of helicopter.

response

Not accepted

This cannot be regulated in an AMC.

comment

43

comment by: *Schimmel*

concerning FCL 625H

Cross credit of IR checks Helicopter

Attachment 8

Among the prof Check form LBA it is possible to cross credit an IR Check for SE Type rating and SP ME-Type rating.

But it is not possible to cross credit MP Rating.



	<p>This makes no sense because IR in a MP environment is easier than in a SP environment. A pilot which is able to fly IR as Single Pilot normally would have no problem to fly IR in a Multi Pilot Crew environment.</p> <p>As well for holders of SP and MP IR it doesn't help. With that rule he/she has to undergo an additional proficiency check just for the Multi pilot IR which has a high cost impact.</p>
response	<p>Not accepted</p> <p>The drivers of this amendment were compliance with the IR and safety.</p>

comment	<p>55</p> <p>comment by: <i>European Cockpit Association</i></p> <p>Commented text:</p> <p>Subpart G - Instrument rating - IR</p> <p>Paragraph (b)(1) of FCL.740 determines that if the instrument rating has lapsed, the applicant shall go through under go refresher training at an ATO, to reach the level of proficiency needed to pass the instrument element of the skill test prescribed in Appendix 9 to Part-FCL. The amount of refresher training needed should be determined on a case-by-case basis by the ATO, taking into account the following factors:'</p> <p>ECA's Comments:</p> <p>A definition of what a training session is - is needed for harmonization. Actually you can find refresher training of 30 min ground school or 3h flight training. Also there is no guidance.</p>
response	<p>Not accepted</p> <p>This should be determined by the approved training organisation (ATO); therefore, no further guidance can be provided.</p>

3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 11
SUBPART H — CLASS AND TYPE RATINGS

comment	<p>1</p> <p>comment by: <i>Henk van den Berg</i></p> <p><u>AMC1 FCL.740(b)(1) Validity and renewal of class and type ratings</u></p> <p><u>RENEWAL OF CLASS AND TYPE RATINGS: REFRESHER TRAINING</u></p> <p>(3) the amount of time lapsed since the expiry of the validity period of the rating. The amount of training needed to reach the desired level of proficiency should increase</p>
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with the time lapsed. In some cases, after evaluating the pilot, and when the time lapsed is very limited (less than 3 months), the ATO may even determine that no further refresher training is necessary.

The rest of the text gives guidance only.

Comments

The highlighted part of this AMC is guidance material as it leaves it up to the ATO to take the the items into consideration or not.

One NAA requires “compliance” with this AMC in order to assure compliance with FCL.740. From a regulatory standpoint this is correct. However seeing the way this part of the AMC is written, it is intended as a recommendation.

Proposed solution:

It is proposed to detach the guidance text from this AMC and move it to GM. This way the purpose of providing guidance is still – or even better – served and NAAs and ATOs have clarity about how to be compliant with the rule.

response

Not accepted

An AMC should provide for both: compliance with the IR and an explanation on how to comply with it. A GM helps to understand the IR.

comment

18

comment by: *Martin PFEIFENBERGER*

AMC2 FCL.725(a)

General:

A clear statement is missing, if the OEB data is mandatory or recommendation. Some competent authorities deny the approval of type rating training manuals if the content of the OEB is contained therein without any deviation, other CAAs see it as recommendation (as it is defined according to the definition on the EASA web site).

(c) Initial Issue MPH: Why is there no reduction in flight time if the holder already holds the SPH rating of the same type?

(d) Extend privileges on the same type rating from SPH to MPH (except for initial MP issue) or from MPH to SPH: Why is there no training described using an FTD?

AMC1 FCL.740(b)(1) The term “training session” should be defined. What does that mean? 1 flight hour, theory training, etc.?

AMC1 FCL.740(b)(1) (a)(3)(iv)

The last sentence ends with “according to other valid ratings held”. For example this would mean that if e.g. an ATPL(H) holder holds one or several ME(H) ratings but does not hold a valid SET(H) rating and wants to renew e.g. a SET(H) rating, that he has to fulfil the requirements for “initial type issue” (which would by the way be the



	<p>same requirements as for example for an holder of a PPL(H) who applies the first time for a SET(H)). Why are the requirements for “additional type issue” not applicable in general, since the applicant has obviously already gained some experience not only on that helicopter category, but even on that particular helicopter type?</p>
response	<p><i>AMC2 FCL.725(a)</i></p> <p>Not accepted</p> <p>The use of operational suitability data (OSD) is clarified in the IR, point FCL.725.</p> <p><i>(c) Initial Issue MPH: Why is there no reduction in flight time if the holder already holds the SPH rating of the same type?</i></p> <p>Not accepted</p> <p>This cannot be regulated by an AMC. It should be considered with an amendment to the IR.</p> <p><i>Training session</i></p> <p>Not accepted</p> <p>This depends on the student and therefore, cannot be defined.</p> <p><i>According to other valid ratings held</i></p> <p>Not accepted</p> <p>EASA provides for sufficient flexibility: for this AMC, alternative means of compliance (AtIMoC) are accepted when determining the amount of refresher training needed by an individual applicant.</p>
comment	<p>44 comment by: <i>Schimmel</i></p> <p>Regarding FCL.740</p> <p>It makes no sense to limit the revalidation of a type rating or class rating to within the last 3 month immediately preceding the expiry date.</p> <p>Furthermore it would even generate a higher level of flight safety if it would be possible to do proficiency checks within the period of validity.</p> <p>It was possible during the last years and had no negative effect. With that possibility rating holder were able to perform Proficiency checks when ever needed. (i.e. longer absence due to work in foreign countries or medical treatment in a hospital at the period of experience u.a).</p> <p>It was also easier for companies to plan check rides. (shifting of checks due to high season or unavailability of simulators or Aircrafts).</p>
response	<p>Not accepted</p>

This is regulated by the IR.

comment	<p>46 comment by: <i>Ing. Domenico Schiavo</i></p> <p>in the - AMC1 FCL.740(b)(1) Validity and renewal of class and type rating -is reported that in the case the type rating is lapsed some training session should be to need.</p> <p>The ATO sets the amount time of training session as flight time.</p> <p>In this case the flight time = training session and for some ATO the minimum training session is 1 hour and some ATO minimum training session is 20 minutes.</p> <p>So i think that is necessary to establish a minimum amount time of training session, in this way is establish a minimum of the standardisation on the training criteria for the organisation.</p>
response	<p>Not accepted</p> <p>This should be determined by the ATO/declared training organisation (DTO)/instructor; therefore, no further guidance can be provided.</p>

comment	<p>47 comment by: <i>Nick Carr</i></p> <p>AMC1 FCL.740(b)(1) para (a)</p> <p>Again referring to refresher training for class or type rating renewal needing to be conducted at an ATO. I would again recommend the agency reconsider the involvement of an ATO for ratings such at the SEP Land and TMG etc to remove restrictions from GA.</p>
response	<p>Noted</p> <p>This issue was dealt with through RTM.0657 that provided for amendments in the General Aviation (GA) training, testing, and checking. The amendments to the AMC and GM were adopted with ED Decision 2018/009/R.</p>

comment	<p>56 comment by: <i>European Cockpit Association</i></p> <p>Commented text:</p> <p>AMC1 FCL.740(b)(1)</p> <p>Paragraph (b)(1) of FCL.740 determines that if a class or type rating has lapsed, the applicant shall take refresher training at an ATO.</p> <p>ECA's Comments:</p> <p>We don't agree with deleting of this paragraph.</p>
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response	Not accepted It is not necessary to repeat the IR requirements in the AMC.
comment	57 comment by: <i>European Cockpit Association</i> Commented text: AMC1 FCL.740 Training flight items should be based on the exercise items of the proficiency check as deemed relevant by the instructor and depending on the experience of the candidate. The briefing should include a discussion on threat-and-error management with special emphasis on decision-making when encountering adverse meteorological conditions, unintentional Instrument Meteorological Conditions (IMCs) and navigation flight capabilities. ECA's Comment: This change is quite ambitious, as we doubt some FE are current in TEM or ADM.
response	Noted
comment	74 comment by: <i>Light Aircraft Association</i> The LAA do not support mandating the content of the training flight(s). Requirements for training flight items, to be based on elements from the proficiency check, were previously recommended in the UK via an AIC issued following the introduction of JAR-FCL. This was considered unsuccessful due to instructors misinterpreting the guidance and treating the flight as a “mini skill test”. The UK CAA subsequently allowed this AIC to expire. Further guidance was then issued via a CAA TRAININGCOM 01/2006. Whilst it is agreed that there is significant benefit in an appropriate briefing and structured training flight, it is considered more appropriate to allow the instructor sufficient latitude to tailor the training to the needs of the student by either removing this amendment completely or replacing it with a more general statement.
response	Not accepted Stakeholders specifically requested to provide guidance for instructors on how to perform the training flight.



3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 11-13
SUBPART I — ADDITIONAL RATINGS

comment

5

comment by: IAOPA (EUROPE)

Observation	Proposed new text
<p>PPL(A) NIGHT RATING COURSE</p> <p>Paragraph (d) (1)</p> <p>IAOPA (Europe) doubts the value of completing exercise 7 other than in the aeroplane. It is possible that this is a typographical error, since similar wording is used in the PPL(H) course which does not include an exercise 7.</p> <p>Therefore IAOPA (Europe) proposes the amendment as indicated.</p>	<p>(1) In all cases, exercises 4 to 6 7 of the night rating flight syllabus should be completed in the aeroplane.</p>

response

Accepted

The text is amended accordingly.

comment

6

comment by: IAOPA (EUROPE)

Observation	Proposed new text
<p>PPL(A) NIGHT RATING COURSE</p> <p>Paragraph (d) (4) (vii) (B)</p> <p>IAOPA recommends that a student should be permitted to practise supervised solo night navigation flight as an alternative to SPIC.</p> <p>Therefore IAOPA (Europe) proposes the amendment as indicated.</p>	<p>(B) practise night cross-country dual and as either SPIC or supervised solo to a satisfactory standard.</p>



response Accepted
The text is amended accordingly.

comment 7 comment by: IAOPA (EUROPE)

Observation	Proposed new text
<p>PPL(H) NIGHT RATING COURSE</p> <p>Paragraph (d) (1)</p> <p>IAOPA considers that this sentence is incomplete. As written it merely recommends that the exercises should be completed, but does not state whether they should be completed in a helicopter-in-flight as clearly they should.</p> <p>Therefore IAOPA (Europe) proposes the amendment as indicated.</p>	<p>(1) In all cases, exercises 4 to 6 of the night rating flight syllabus should be completed in a helicopter-in-flight.</p>

response Accepted
The text is amended accordingly.

comment 8 comment by: IAOPA (EUROPE)

Observation	Proposed new text
<p>PPL(H) NIGHT RATING COURSE</p> <p>Paragraph (d) (4) (vi) (B)</p> <p>IAOPA recommends that a student should be permitted to practise supervised solo night navigation flight as an alternative to SPIC.</p> <p>Therefore IAOPA (Europe) proposes the amendment as indicated.</p>	<p>(B) practise night cross-country dual and as either SPIC or supervised solo to a satisfactory standard.</p>



response Accepted
The text is amended accordingly.

comment 11 comment by: Estonian CAA
AMC1 FCL.810(b) Night rating
PPL(A) training, exercise 7 - it is recommended to specify is it either in the aeroplane or FSTD.

response Accepted
The text is amended accordingly.

comment 32 comment by: Marlies Campi - President EMP
SUBPART I - ADDITIONAL RATINGS - FCL-815 MOUNTAIN RATING
AMC1 FCL.815 Theoretical knowledge and flying training
The english used in this AMC is very bad, some words found in the text do not even exist in english.
If a member state has to translate this AMC into its own language, it will have great difficulties and the final result will be bad or even wors than the english version.
Comment from the European Mountain Pilots Federation (EMP)
www.europeanmountainpilots.org
REVISED ENGLISH TEXT FOR AMC1 FCL.815 Mountain Rating

THEORETICAL KNOWLEDGE	
WHEEL	SKI
1.Equipment	
W.1.1 Personal flight equipment	S.1.1 Personal flight equipment
W.1.2 Aircraft equipment	S.1.2 Aircraft equipment
2.Operations	
W.2.1 Approach and landing technique on sloped mountain strips	S.2.1 Approach and landing technique on sloped mountain strips
	S.2.2 Landing technique on skis



W.2.2 Taxiing techniques on steep airstrips	<i>S.2.3 Taxiing techniques on skis on different types of snow</i>
W.2.3 Take-off technique	<i>S.2.4 Take-off technique on snow covered surfaces</i>
W.2.4 Aircraft and engine performance at high altitude	
3. Regulation	
W.3.1 Mountain Rating	<i>S.3.1 Mountain Rating</i>
W.3.1.1 Site Authorization	<i>S.3.1.1 Site Authorization</i>
W.3.2 Overflight rules	<i>S.3.2 Overflight rules</i>
W.3.3 Mountain sites classification	<i>S.3.3 Mountain site classification</i>
W.3.4 PIC's responsibilities	<i>S.3.4 PIC's responsibilities</i>
W.3.5 Mountain Site manager's responsibilities	<i>S.3.5 Mountain Site manager's responsibilities</i>
W.3.6 Flight plan	<i>S.3.6 Flight plan</i>
	<i>S.3.7. Certification of airplanes equipped with skis</i>
4 Meteorology	
W.4.1. Movements of the air	<i>S.4.1 Movements of the air</i>
W.4.2. In-flight consequences	<i>S.4.2 In-flight consequences</i>
W.4.3. Interaction between air and terrain	<i>S.4.3 Interaction between air and terrain</i>
W.4.4. Altimetry	<i>S.4.4 Altimetry</i>
5 Human performance and limitations	
W.5.1. The cold	<i>S.5.1 The cold</i>
W.5.2. Food	<i>S.5.2 Food</i>
W.5.3. Hypoxia	<i>S.5.3 Hypoxia</i>
W.5.4. Brightness	<i>S.5.4 Brightness</i>
W.5.5 Dehydration	<i>S.5.5 Dehydration</i>
W.5.6. Fatigue	<i>S.5.6 Fatigue</i>
W.5.7 Turbulence effects at high altitude	<i>S.5.7 Turbulence effects at high altitude</i>
6 Navigation	

W.6.1 Route determination	<i>S.6.1 Route determination</i>
W.6.2 Dead reckoning	<i>S.6.2 Dead reckoning</i>
W.6.3 The flight path over terrain	<i>S.6.3 The flight path over terrain</i>
W.6.4 Navigation in the valleys	<i>S.6.4 Navigation in the valleys</i>
W.6.5 Obstacle detection (high voltage lines, chairlifts, cables etc)	<i>S.6.5 Obstacle detection (high voltage lines, chairlifts, cables, etc)</i>
7 Specific items	
	<i>S.7.1 Knowing the snow. In-flight snow nature assesment.</i> <i>S.7.2 Knowing glaciers</i> <i>S.7.3 The life of the glaciers</i> <i>S.7.4 Crevasse (crack) formation</i> <i>S.7.5 Snow bridges</i> <i>S.7.6 Avalanches</i>
8 Survival	
	<i>S.8.1 How to survive (psychological aspects)</i> <i>S.8.2 How to use the equipment</i> <i>S.8.3 How to remove the snow from the airplane</i> <i>S.8.4 Building a shelter</i> <i>S.8.5 How to eat and feed</i>
FLIGHT INSTRUCTION	
WHEEL	<i>SKI</i>
I – Navigation	
W.I.1. Flight techniques in the valleys	<i>S.I.1 Flight techniques in the valleys</i>
W.I.2. Flight over mountain passes and ridges	<i>S.I.2 Flight over mountain passes and ridges</i>
W.I.3. U-turns in narrow valleys	<i>S.I.3 U-turns in narrow valleys</i>
W.I.4. Flight path choice depending on wind conditions	<i>S.I.4 Flight path choice depending on wind conditions</i>



W.I.5. Chart reading	<i>S.I.5 Chart reading</i>
II – Arrival and surface evaluation	
W.II.1. Choice of the arrival altitude	<i>S.II.1. Choice of the arrival altitude</i>
W.II.2. Overflight and arrival pattern determination	<i>S.II.2. Overflight and arrival pattern determination</i>
W.II.3. Landing pattern determination	<i>S.II.3. Landing pattern determination</i>
W.II.4. Identification of the wind conditions	<i>S.II.4. Identification of the wind conditions</i>
W.II.5. Runway length identification	<i>S.II.5. Runway length identification</i>
W.II.6. Runway slope and banking identification	<i>S.II.6. Runway slope and banking identification</i>
W.II.7. Collision avoidance	<i>S.II.7. Collision avoidance</i>
W.II.8. Choice of the landing references (aiming and touchdown point)	<i>S.II.8. Choice of the landing references (aiming and touchdown point)</i>
W.II.9. Circuit pattern altitude determination	<i>S.II.9. Circuit pattern altitude determination</i>
W.II.10. Final landing speed choice depending on runway slope	<i>S.II.10. Final landing speed choice depending on runway slope</i>
	<i>S.II.11. Choice of the take-off axis</i>
	<i>S.II.12. Choice of the landing axis</i>
	<i>S.II.13. Choice of the parking area</i>
	<i>S.II.14. Ground obstacle observation (crevasses, snow bridges, avalanches)</i>
	<i>S.II.15. Assesment of the snow nature</i>
	<i>S.II.16. Route determination for reaching a mountain shelter from the landing area</i>
III – Approach and landing	
W.III.1 Landing pattern altitude	<i>S.III.1 Landing pattern altitude</i>
W.III.2 Gliding slope precision	<i>S.III.2 Gliding slope precision</i>
W.III.3 In-flight adjustments (accuracy, quick actions)	<i>S.III.3 In-flight adjustments (accuracy, quick actions)</i>
W.III.4 Landing technique (flare and touch down point precision)	<i>S.III.4 Landing technique (flare and touch down point precision)</i>



W.III.5 Taxiing technique depending on runway slope (use of engine power)	S.III.5 Taxiing technique depending on runway slope and snow nature
W.III.6 Aircraft parking technique depending on runway and apron profile, other aircraft etc	S.III.6 Aircraft parking technique depending on runway profile and snow nature
	S.III.7 Turning of the aircraft depending on snow nature and runway profile
IV – Take-off	
W.IV.1 Take-off safety checks	S.IV.1 Take-off safety checks
W.IV.2 Lining-up	S.IV.2 Lining-up
W.IV.3 Runway axis control during take-off roll	S.IV.3 Runway axis control during take-off roll
W.IV.4 Choice and use of the Take-off axis visual references	S.IV.4 Choice and use of the Take-off axis visual references
	S.IV.5 Acceleration depending on snow nature
	S.IV.6 Short take-off
	S.IV.7 Take-off avoiding the skid of the skis
V – Survival	
	S.V.1 Use of snow shoes
	S.V.2 Use of markings

response

Noted

EASA will perform a consistency check in a subsequent amendment.

comment

58

comment by: *European Cockpit Association*

Commented text:

Subpart I - Additional Ratings

Night rating, a syllabus for the aeroplane **and helicopters** category is added:

ECA's Comment:



	Helicopters should be included
response	Not accepted The AMC already contains the syllabus for helicopters.
comment	65 comment by: <i>René Meier, Europe Air Sports</i> AMC1 FCL.810(b) Night rating p 11/38 Please make clear that LAPL(A) licence holders also are entitled to fly at night by adding "...to qualify PPL(A) "...and LAPL..." between "PPL(A)" and holders in (a) on the first line. Rationale: In our view night ratings are available for PPL(A) and LAPL(A) holders.
response	Accepted The text is amended accordingly, for helicopters as well.
comment	77 comment by: <i>Finnish Transport Safety Agency</i> AMC1 FCL.810(b) The syllabus 'PPL(A) night rating course' should be under its own AMC1 FCL.810 (a) as FCL.810 (b) refers only to helicopters.
response	Accepted The text is amended accordingly.
comment	78 comment by: <i>Finnish Transport Safety Agency</i> AMC1 FCL.810(b) point (d) As the night flying training can be flown also in a TMG, TMG should be added in the point (d)(1) and (2). In addition Finland recommends to amend the text in point (d)(2) in order to clarify that the FSTD training hours may not be included in the mandatory 5 hour flight time specified in FCL.810(a)(1)(ii). This is supported by the definition 'flight time' which means only flights with an aircraft, and by the challenging nature of the night flying. Proposed text:

AMC1 FCL.810(b)

(d) Flying training The exercises of the night rating flight syllabus should be repeated as necessary until the student achieves a safe and competent standard:

(1) In all cases, exercises 4 to 6 of the night rating flight syllabus should be completed in the aeroplane or TMG.

(2) For exercises 1 to 3, up to 50 % of the required flight training may be completed in an FSTD(A). However, all items within each exercise should be conducted in an aeroplane or TMG in flight. The training hours flown in an FSTD may not be included in the mandatory 5 hour flight time specified in FCL.810 (a)(1)(ii).

response

Accepted

The text is amended accordingly.

3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA 20156) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 13-35 SUBPART J — INSTRUCTORS

comment

19

comment by: DGAC France

Subject:

Refresher training for FI certificate renewal (FCL.940.FI (c) and AMC1 FCL.940.FI)

Content of comment:

FCL.940.FI (c) distinguishes the case of a FI renewal when the certificate has lapsed for less or more than 3 years.

In the case of a renewal of less than 3 years the proposed amendment consists in requiring the same instructor refresher training than the one for revalidation conducted by an ATO or a competent Authority (cf. FCL.940.FI (a) (2)) and an assessment of competence (FCL.935). In the case of a renewal of more than 3 years the proposed amendment consists in requiring instructor refresher training at an ATO (providing FI/IRI courses) and to pass an assessment of competence (FCL.935).

France considers that it is not relevant to distinguish a renewal of more or less than 3 years. With the NPA proposal it will be possible to renew a FI certificate after 6 years by having only received a theoretical refresher training (refresher training for revalidation described in AMC1 FCL.940.FI (a)) and having passed an assessment of competence (FCL.935).

France considers that for all renewals (less and more than 3 years) the refresher training program shall be always determined by an ATO (providing FI/IRI courses) on a case by case basis. This program may include some practical training according to



the needs of the candidate and should not be automatically limited to pure theoretical training when the certificate has lapsed for less than 3 years.

France suggests keeping current wording of the regulation (FCL.940.FI (c)) and adding the precision that refresher training for renewal has to be conducted at an ATO only.

Accordingly the wording of AMC1 FCL.940.FI §(b) should be slightly amended to delete the reference to the 3 years. Therefore this §(b) will be always applicable for a renewal (for less or more than 3 years).

Proposed amendment:

FCL.940.FI

[...]

(c) Renewal.

If the FI certificate has lapsed, the applicant shall, within a period of 12 months before renewal:

(1) attend an instructor refresher seminar at an ATO;

(2) pass an assessment of competence in accordance with FCL.935.

AMC1 FCL.940.FI - IRI

[...]

(b) If the instructor rating has lapsed ~~for more than 3 years when assessing~~ the refresher training programme, the ATO should consider all the above and the following items:

[...]

response

Accepted

The text is amended accordingly.

comment

23

comment by: DGAC France

Subject:

TRI non restricted additional training (AMC1 FCL.930.TRI)

Part 3 Flight Instruction Syllabus

§ (k) (2)

Content of comment:

The content of the additional training to be a non restricted TRI is defined in § (k) (2) of Part 3 Flight Instruction Syllabus.

This additional training contains exercises to cover both normal and abnormal operations.



France considers that two levels of training for non restricted TRI should be defined in the AMC.

A first level including only exercises covering normal situations and a second level including exercises covering both normal and abnormal when the privileges to conduct emergency and abnormal procedures in an airplane are sought.

As a matter of fact some operators may be interested in having TRI(A) trained only for providing instruction for normal operations on an aeroplane. The content of the additional training should be adjusted accordingly in the AMC.

Proposed amendment:

AMC1 FCL.930.TRI

[...]

(k)

(2) For non-restricted TRI(A):

*Training courses should be developed in such a way so as to help the applicant gain experience in training a variety of exercises, covering both normal and abnormal operations **depending on the base training instructional privileges that are sought.** The syllabus should be tailored and appropriate to the aeroplane type, using exercises considered more demanding for the student.*

The syllabus has to be assessed by the management system as required in ORA GEN 200.(3)

(i) TRI(A) conducting normal operations

Base training patterns and normal operations excluding emergency and abnormal procedures in an airplane when base training under normal operations privileges are sought.

At the completion of training above the applicant should be required to conduct a training flight under the supervision and to the satisfaction of a suitable TRI(A) nominated for this purpose by the ATO.

(ii) TRI(A) conducting abnormal operations

Emergency and abnormal procedures in an airplane including simulated engine-out handling, engine-out operations and representative exercises from the type transition course when emergency and abnormal procedures in an airplane privileges are sought.

At the completion of training above the applicant should be required to conduct a training flight under the supervision and to the satisfaction of a suitable TRI(A) nominated for this purpose by the ATO.

response

Noted



comment	28	comment by: <i>KLM</i>
	<p>AMC1 FCL.930.TRI part 3 paragraph LONG BRIEFINGS</p> <p>The paragraph about long briefings is applicable to "training on asymmetric power flight on SP MET aeroplanes" only and is NOT applicable to other TRI training subjects. This should be clearly stated in the text. Otherwise confusion and misinterpretation can occur.</p>	
response	<p>Accepted</p> <p>The title is amended for clarity.</p>	

comment	31	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	<p>Relevant Text: Part 3 (k) (1), last paragraph.</p> <p>Comment: It should be possible for the AOC-holder to nominate a TRI for the LIFUS training, as long as the ATO is satisfied. Because the LIFUS is done by the operator it is easier if they schedule the TRI.</p> <p>Proposal: Allow for the AOC-holder to nominate the TRI, with the approval of the ATO.</p>	
response	<p>Not accepted</p> <p>It is impossible to regulate operational issues in an AMC to Part-FCL.</p>	

comment	33	comment by: <i>Bond Offshore Helicopters</i>
	<p>AMC1 FCL.940.TRI (a)</p> <p>Can we also make a statement to say -</p> <p>held as a seminar or <u>ground/flying training</u> covering the following items.</p>	
response	<p>Not accepted</p> <p>The content of the seminar is already specified; therefore, there is no need to use the proposed extended term.</p>	

comment	34	comment by: <i>FAA</i>
	<p>Reference text: Paragraph (b)(1) The amount of refresher training needed should be determined on a case-by-case basis by the ATO following an assessment of the</p>	

	<p>candidate by taking into account the following factors: (i) the experience of the applicant.</p> <p>Comment: When discussing the experience of the applicant; it should be made clear this includes total experience, as well as recent experience, as both a pilot and instructor.</p> <p>Reference text: Paragraph (b)(2) Once the ATO has determined the needs of the applicant, it should develop an individual training programme that should be based on the content of the FI or IRI training course and should focus on the aspects where the applicant has shown the greatest needs.'</p> <p>Comment: For ease of reading, omit "that should be" following the word "programme."</p>
response	Noted
comment	<p>35 comment by: FAA</p> <p>Reference text: (h) The student instructor should learn how to identify common errors and how to correct them properly, which should be emphasised at all times.</p> <p>Comment: The term "student instructor" could lead to confusion. A change to the term "instructor candidate" of "instructor in training" is recommended.</p>
response	<p>Not accepted</p> <p>Terminology is correct and should be consistent throughout the AMC and GM to Regulation EU (No) 1178/2011.</p>
comment	<p>38 comment by: DGAC France</p> <p>Subject:</p> <p>TRI and SFI refresher training (AMC1 FCL.940.TRI/FCL.940.SFI)</p> <p>Content of the comment:</p> <p>The regulation references used in the title of the new AMC1 are incorrect.</p> <p>The reference FCL.940.TRI (b) (2) (i) is not the correct reference to the instructor refresher training for TRI(H) renewal. The correct one is FCL.940.TRI (b) (2) (ii).</p> <p>The AMC is also addressing the instructor refresher seminar training for SFI renewal. The reference to such refresher training is missing in the title of the AMC. A reference to FCL.940.SFI (e) (1) should be added.</p> <p>Proposed amendment:</p> <p>AMC1 FCL.940.TRI(a)(1)(ii) and (2)(ii), (b)(1)(ii) and (b)(2)(ii) (i) and FCL.940.SFI(a)(2) and (e) (1) Revalidation and renewal</p>

response Accepted
The text is amended accordingly.

comment 39 comment by: *Geoffroy BEMELMANS*
for LIFUS:
I suspect that the LIFUs role-play is conducted with the TRI(A) approved to conduct such training occupying the other seat, in which case it could be made clear in the text.
Also, can the role-play "line flying under supervision" be conducted in the same manner as above? And can that be the same TRI(A) who did the first sector?

response Not accepted
Line flying under supervision (LIFUS) is not a role play but real during training.

comment 45 comment by: *IAOPA (EUROPE)*

Observation	Proposed new text
<p>IAOPA (Europe) notes that AMC1 FCL.940.CRI has not been amended to reflect the proposals of NPA 2014-29(A). Furthermore, AMC & GM to Annex I (Part-FCL) to Commission Regulation (EU) No 1178/2011 includes refresher training seminar guidance for FI, IRI, TRI and SFI certificates, but not for the CRI certificate. The 2 day requirement of AMC1 FCL.940.FI (a) (2) is disproportionate for a CRI seminar, given the privileges of the CRI certificate; however, AMC1 FCL.940.TRI is more flexible, in that the TRI refresher training seminar may be conducted using a combination of either e-learning, two-way online meetings and face-to-face seminars, and should consist of 6 hours of learning.</p> <p>IAOPA (Europe) recommends that RMT.0596 should both review AMC1 FCL.940.CRI and propose a format for CRI refresher training seminars, but that these should require no more than 6 hours of learning and may be conducted at an ATO or an organisation approved by a competent authority.</p>	n/a

response Noted
This will be considered in future RMTs.



comment	<p>49</p> <p style="text-align: right;">comment by: <i>AeronautX Luftfahrtschule</i></p> <p>Due to the fact, that for business aircraft operators access to FFS is IMPOSSIBLE, this section shall be changed and allow training in aeroplane. Business aircraft TRIs are required in order to fulfill OPS requirements and to conduct LIFUS and base training. So there shall be a possible training path that leads to TRI for LIFUS and BASE TRAINING without FFS qualification, as the global training providers (CAE and FSI) do not allow operator TRIs to train in the FFS.</p> <p>Our proposal is:</p> <p>AltMOC to AMC1.930.TRI:</p> <p>TRI — Training course</p> <p>(a) The TRI training course shall include, at least:</p> <p>(1) 25 hours of teaching and learning; (UNCHANGED)</p> <p>(2) 10 hours of technical training; (UNCHANGED)</p> <p>(3) 5 hours of flight instruction on the appropriate aircraft or a simulator representing the aircraft for single-pilot aircraft, or 10 hours for multi-pilot aircraft on the appropriate aircraft and/or simulator representing the aircraft. The 10 hours may be any combination of hours on the simulator or aircraft, based on device availability and/or candidate-specific goals.</p> <p>If the TRI is to instruct in the aircraft, at least 2 hours training must be accomplished in the aircraft, and the candidate's AoC must be conducted in the aircraft.</p> <p>If training is accomplished on the aircraft only, TRI-qualification shall be limited to aircraft only. Additional training in the FFS (at least 2 hours), will be required for FSTD qualification.</p> <p>If training is accomplished on the simulator only, TRI qualification shall be limited to simulator only. Additional training in the aircraft (at least 2 hours) must be completed, and an AoC passed in the aircraft to attain TRI qualification in the aircraft.</p> <p>Outcome:</p> <p>This Alternative Means of Compliance will lead to the following licences:</p> <p>TRI restricted to LIFUS and Base Training</p> <p>TRI restricted to FFS only</p> <p>TRI restricted to FFS/LIFUS/Base Training</p> <p>TRI unrestricted</p>
response	Noted

The TRI limitations and training were reviewed; the new definitions of the terms 'available' and 'accessible' provide for a different approach to the availability of FSTDs.

comment

50

comment by: *Edward Faciszewski*

Due to the fact, that for business aircraft operators access to FFS is IMPOSSIBLE, this section shall be changed and allow training in aeroplane. Business aircraft TRIs are required in order to fulfill OPS requirements and to conduct LIFUS and base training. So there shall be a possible training path that leads to TRI for LIFUS and BASE TRAINING without FFS qualification, as the global training providers (CAE and FSI) do not allow operator TRIs to train in the FFS.

AMC1.930.TRI:

TRI — Training course

(a) The TRI training course shall include, at least:

(1) 25 hours of teaching and learning; (UNCHANGED)

(2) 10 hours of technical training; (UNCHANGED)

(3) 5 hours of flight instruction on the appropriate aircraft or a simulator representing the aircraft for single-pilot aircraft, or 10 hours for multi-pilot aircraft on the appropriate aircraft and/or simulator representing the aircraft. The 10 hours may be any combination of hours on the simulator or aircraft, based on device availability and/or candidate-specific goals.

If the TRI is to instruct in the aircraft, at least 2 hours training must be accomplished in the aircraft, and the candidate's AoC must be conducted in the aircraft.

If training is accomplished on the aircraft only, TRI-qualification shall be limited to aircraft only. Additional training in the FFS (at least 2 hours), will be required for FSTD qualification.

If training is accomplished on the simulator only, TRI qualification shall be limited to simulator only. Additional training in the aircraft (at least 2 hours) must be completed, and an AoC passed in the aircraft to attain TRI qualification in the aircraft.

Outcome:

This Alternative Means of Compliance will lead to the following licences:

TRI restricted to LIFUS and Base Training

TRI restricted to FFS only

TRI restricted to FFS/LIFUS/Base Training

TRI unrestricted

response

Noted



The TRI limitations and training have been reviewed and there are new definitions of 'available' and 'accessible' that provide for a different approach to the availability of FSTDs.

comment 52 comment by: *Danish Transport Authority*

Relevant Text: Part 3 (k) (1), last paragraph.

Comment: It should be possible for the AOC-holder to nominate a TRI for the LIFUS training, as long as the ATO is satisfied. Because the LIFUS is done by the operator it is easier if they schedule the TRI.

Proposal: Allow for the AOC-holder to nominate the TRI, with the approval of the ATO.

response Not accepted
It is impossible to regulate operational issues in an AMC to Part-FCL.

comment 59 comment by: *European Cockpit Association*

Commented text:

AMC1 FCL.930.FI

'(d) The skill test assessment of competence is additional to the course training time.'

ECA's Comments:

We agree with the change.

response Noted

comment 60 comment by: *European Cockpit Association*

Commented text:

AMC1 FCL.940.FI(a)(2)

AMC1 FCL.940.FI(a)(2); FCL.940.IRI FI, IRI — Revalidation and renewal

(b) If the instructor rating has lapsed for more than 3 years when assessing the refresher training programme, the ATO should consider all the above and the following items:



	<p>(1) The amount of refresher training needed should be determined on a case-by-case basis by the ATO following an assessment of the candidate by taking into account the following factors:</p> <ul style="list-style-type: none"> (i) the training experience of the applicant; (ii) the amount of time elapsed since the expiry of the FI or IRI certificate; (iii) the technical elements of the FI/IRI course as determined by the assessment of the candidate by the ATO. <p>(2) Once the ATO has determined the needs of the applicant, it should develop an individual training programme that should be based on the content of the FI, or IRI training course and should focus on the aspects where the applicant has shown the greatest needs</p> <p>ECA's Comments:</p> <p>TRI should also be included in refresher training.</p>
response	<p>Not accepted</p> <p>This would require in-depth analysis of the two courses, which will be considered in future RMTs.</p>

comment	<p>66 comment by: <i>René Meier, Europe Air Sports</i></p> <p>AMC1 FCL.930.TRI</p> <p>page 14/38</p> <p>What a task!</p> <p>Rationale:</p> <p>We are not in a position to establish ourselves comparison tables to find out what is old and what is new. May we kindly invite the Agency to prepare such tables? Many thanks.</p>
response	<p>Noted</p> <p>This will be considered in future RMTs.</p>

comment	<p>69 comment by: <i>Cristian DURANTE</i></p> <p>Part 3</p> <p>FLIGHT INSTRUCTION SYLLABUS</p> <p>(b) Granted that the success of any training program depends on the competence of its instructor, I would like to suggest the replacing of "should" with "shall" given the importance of the topic.</p>
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response	<p>Not accepted</p> <p>It is impossible to regulate in an AMC: 'shall' is reserved for the IR text.</p>
comment	<p>75 comment by: <i>Light Aircraft Association</i></p> <p>The LAA support the addition of FCL.940.FI(a)(2)(b) which allows the ATO flexibility to tailor the training programme to the needs of the applicant.</p>
response	<p>Noted</p>
comment	<p>76 comment by: <i>Cristian DURANTE</i></p> <p>AMC2 FCL.930. TRI</p> <p>I should like to emphasise that it is essential to achieve better standard harmonisation in design of such flight instruction Syllabus (competency-based training method), between aeroplanes and helicopters; in order to goes beyond the technical aspect (system knowledge & aircraft-handling skill), to help pilots learn and practice also the higher level automation skills necessary to manage a flight. This is why I recommend the reinforcement of TEM and CRM/SRM concept even for TRI (H).</p>
response	<p>Noted</p> <p>This will be considered in future RMTs when the competency-based training and assessment (CBTA) concept is implemented for all licences and ratings.</p>
comment	<p>79 comment by: <i>Finnish Transport Safety Agency</i></p> <p>AMC1 FCL.930.TRI</p> <p>It is recommended to restructure the AMC text under heading 'AEROPLANE TRAINING for LIFUS and non-restricted TRI(A)' as the requirements for TRI conducting base training are now embedded and unclear.</p> <p>In addition same terminology should be used in FCL.930.TRI and in the corresponding AMC i.e. base training vs. landing training.</p>
response	<p>Not accepted</p> <p>This is an important change which needs to go anew through the rulemaking process in a future RMT.</p>

comment	86	comment by: <i>The Finnish Aeronautical Association</i>
	<p>“The text of AMC1 FCL.930.TRI is replaced as follows:” <i>[follows approx. 20 pages]</i></p> <p><i>Unfortunately, the “one-big-chunk” format of this text makes a comparison between existing and new proposed text a very difficult task.</i></p> <p>Recommendation:</p> <p>The NPA should preferably be structured clause-by-clause (old vs. new) to allow comprehension of the changes.</p>	
response	<p>Noted</p> <p>This will be considered in future RMTs.</p>	

3. Proposed amendments — 3.1. Draft AMC & GM (Draft EASA Decision) — 3.1.1. Amendments to AMC and GM to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 — p. 35-37 SUBPART K — EXAMINERS

comment	16	comment by: <i>René Meier, Europe Air Sports</i>
	<p>SUBPART K</p> <p>AMC1 FCL.1015</p> <p>p 35/38</p> <p>We think authorities being the managing system of the course, using "role play" or real proficiency checks as a support for examiner standardisation practical training shall be at the discretion of the Authority.</p> <p>According the type of ATO (independent or provider for an AOC holder) the Authority would or would not consider allowing “live” tests to be used for this training purpose because to do so could:</p> <ul style="list-style-type: none"> - place unfair stress on real candidates (easier to handle in case all participants belong to the same organisation), - leave to chance the number and nature of errors/outcomes/results that the trainee examiner would experience during his course (easier to handle by requiring more sessions for candidates belonging to the organisation running the ATO). <p>Furthermore we think that using a FFS for practical training of examiner students should not be mandatory. Such devices are not easily accessible for some categories of aircraft (especially complex HPA aeroplanes). Consequently, using other FSTDs than FFS could be an advantage for examiner students coming from executive aviation rather than taking the course on non-representative FFS.</p>	



Therefore EAS proposes an alternative draft for AMC1 FCL.1015 paragraph (b) (2) as follows:

GENERAL

(a) The competent authority may provide the course itself or through an arrangement with an ATO. This arrangement should clearly state that the ATO is acting under the management system of the competent authority.

(b) The course should last:

(1) For the FE [...]

new:

(2) For other examiners, at least 3 days, divided into theoretical training (1 day) and practical training (at least 2 days). At the discretion of the Authority, the practical training consists of real or role-played proficiency checks, skill tests or assessments of competence conducted in an FFS when available or in another FSTD.

Rationale:

Our proposal better reflects actual situation and considers human factors.

response

Noted

EASA will consider this proposal in future RMTs.

comment

29

comment by: CAA Norway

AMC1 FCL.1015, is with the new text more in line with what FCL.1015(b)(1) says. Very good!

response

Noted

comment

48

comment by: DGAC France

Subject:

Examiner standardisation course (AMC1 FCL.1015 (b) (2))

Content of comment:

1) DGAC France has made the choice to rely on ATOs for examiner standardisation.

DGAC France is approving examiner standardisation courses provided by granted ATOs and ensure appropriate surveillance of this privilege exercise (ARA.GEN.300 "Oversight").

Depending to the type of ATO (independent ATO or ATO "provider" for a given AOC holder) DGAC-France is in favour of preferring 'role play training' when the TRE student is pertaining to an operator which is not linked with the ATO



Use of “live” tests for TRE training may have some drawbacks if the TRE student is not familiar with the AOC operations standards and training practices. The TRE training should not lead to the following situations:

- place unfair stress on real candidates (easier to handle in case all participants belong to the same organisation),
- leave to chance the number and nature of errors/outcomes/results that the trainee examiner would experience during his course (easier to handle by requiring more sessions for candidates belonging to the organisation running the ATO).

The AMC "role play" should be retained for basic training of TRE having to perform examinations in the context of an ATO or an airline different from the ATO / airline where the TRE training is proposed.

2) In addition DGAC France considers that using a FFS for practical training of examiner should not be mandatory. Such devices are not easily accessible for certain categories of aircraft (especially complex HPA aeroplanes). Consequently, using others FSTDs than FFS could be an advantage for examiner trainees coming from executive aviation rather than taking the course on non-representative FFS.

Therefore France proposes an alternative draft for AMC1 FCL.1015 § (b) (2)

Proposed amendment

AMC1 FCL.1015

GENERAL

[...]

(b) (2) For other examiners, at least 3 days, divided into theoretical training (1 day) and practical training (at least 2 days). The practical training consists of real or role-played proficiency checks, skill tests or assessments of competence conducted in a FFS when available or, using other FSTD deemed adapted for the training purpose. When the TRE training is proposed with a generic objective (the student will exercise his TRE privileges in another ATO/airline) the preferred means of training should be the role-play.

response

Noted

EASA will consider this in future RMTs.

comment

53

comment by: *European Cockpit Association*

Commented text:

GM1 FCL.1015 Examiner standardisation

(3) two tests or checks related to CPL, IR MPL or ATPL;'



	<p><i>In (b):</i></p> <p><i>'(b) An examiner should plan at least 2 hours for a LAPL, SPL or BPL, 3 hours for a PPL, CPL, IR or class rating test or checks, and at least 4 hours for instructor certificates, FI, CPL, IR, MPL, ATPL or MP</i></p> <p><i>type rating tests or checks, including pre-flight briefing and preparation, conduct of the test, check or assessment of competence, debriefing, evaluation of the applicant and documentation.'</i></p> <p><i>In (c)(3):</i></p> <p><i>'(3) 60 minutes for IR, FI EIR, instructor certificates and SP type or class ratings;'</i></p> <p><i>In (c)(4):</i></p> <p><i>'(4) 120 minutes for CPL/IR, MPL, ATPL and MP type ratings.'</i></p> <p>ECA's Comment:</p> <p>Only amended in AMC but not in first issue of Flight Examiner Manual NPA 2014 29 (C)</p> <p>The Flight Examiner Manual needs to be corrected as well.</p>
response	<p>Not accepted</p> <p>Instrument rating and CPL checks are already defined separately.</p>

comment	<p>67 comment by: CAA Norway</p> <p>GM1 Appendix 7 IR skill test is deleted:</p> <p>GM1 to Appendix 7 IR skill test</p> <p>To the skill test, an ME centreline thrust aeroplane is considered an SE aeroplane.</p> <p>We propose that GM1 should <u>not</u> be deleted. The reason is that we believe the flight characteristics with one engine out for an aeroplane with ME centerline thrust, is not that much different than the flight characteristics for a SE aeroplane, except for less thrust.</p>
response	<p>Not accepted</p> <p>The decision to delete the GM was made by experts; EASA still considers this deletion necessary.</p>

comment	<p>87 comment by: AOPA Sweden</p> <p>GM1 FCL.1005 (b).</p>
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response	<p>More examples should be mentioned: colleagues and applicants working within the same organisation or authority.</p> <p>Please note that the checking of colleagues is normal practice within the industry. Close working colleagues are often checking each other with no flight safety implications.</p>
	<p>Not accepted</p> <p>The GM does not need to cater for all possible scenarios.</p>
comment	<p>88 comment by: AOPA Sweden</p> <p>GM1 FCL.1015.</p> <p>The requirements of two tests or checks during Examiner training compared to the requirements in JAR-FCL (zero) are very costly for the industry and will reduce the number of Examiners available.</p> <p>EASA should consider to drop the new requirement. This would be more proportionate and would give more people access to examiners, especially in less densely populated countries like Sweden.</p>
response	<p>Not accepted</p> <p>This was introduced after considering common practice and experts' opinion.</p>



3. Appendix A — Attachments

 [NPA 2014-29 IAOPA response_V3.pdf](#) — Attachment #1 to comment [#89](#)

