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Title	Implementing Rules for Pilot Licensing - Explanatory Note and Appendices
NPA Number	NPA 2008-17a

Deutscher Aero Club has placed **4** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
317	(General Comments)	0	<p>General comment: The drafted documents are difficult to read and to understand by the citizen and user. The rules are drafted in a complex structure, which induces difficulties to understand the rules and relations between the different requirements given in the rule. Different aspects of one regulated item are given at different text passages without reference due to the requirement to regulate every item only once.</p> <p>Justification: By drafting regulation in the given manner, the user is not able to use the regulatory work in an appropriate way. The necessary transparency of the regulatory framework is not achieved. Therefore, the understanding and acceptance of the EU regulation will be diminished.</p>	
319	(General Comments)	0	<p>Provision to count also flight experience gained on Annex II or third country aircraft for the purpose of issue, renewal and revalidation of licenses. Could be done by using a long-lasting conversion system set up by Member States.</p> <p>For example, Annex II aircraft include: State aircraft: e.g. B737. Learjet, Citation service for member of parliament; Police or Rescue Helicopter, military aircraft.</p> <p>It is absurd if a pilot of police helicopters had to fly for the LPL (H), PPL (H) or CPL (H) extra flight hours on a non-state aircraft.</p> <p>Other examples are Historic aircraft, micro light aeroplanes etc. Third country aircraft: flight hours on e.g. N-registered aircraft.</p> <p>DAeC strongly recommends to count launches and hours on Annex II sailplanes flown by glider pilots and instructors towards their licence revalidation.</p>	

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			It is not reasonable to make any difference between sailplanes of Annex I and II, as there are no remarkable differences in practical and theoretical skills of the pilots necessary.	
316	A. Explanatory Note - IV. Content of the draft opinion and decision - Transition measures	16 - 18	<p>Comment: The responsibility for determining the definition of grandfather rights and the transition of licences into the EU system is passed by EASA to the national aviation authorities. To ensure a common transfer of licences into the EU system further organisational stipulations should be given in the rule or AMC material. We suggest to that ICAO-compliant licences should be automatically recognised as EU compliant licences for i.e. the SPL or PPL. Any sub-ICAO national licence or equivalent which are ICAO compliant in respect of the non-medical aspect should also be recognised as EU compliant i.e. LPL.</p> <p>Justification: As ICAO-compliant licences follow the requirements stated by ICAO, which are implemented by the member state and audited by ICAO. These licences automatically will fulfil the requirements for the respective ICAO compliant EU licence. Due to this fact, no transfer procedure has to be described by the member states. Such a simplified procedure will reduce the necessary work and decrease the associated cost load.</p>	
320	Appendix I: Explanatory Memorandum to Part-FCL - Subpart B	21 - 23	The term LPL represents an abbreviation for 'Leisure Pilots Licence'. The word leisure implicates the use of respective licences only for convenience and leisure time. Although decreased requirements are proposed for single subjects of the LPL licences, the given training and experience of the pilots ensure a high level of safety. As air sport is a demanding sport and recreational activity the naming of the licences with leisure does not reflect the high level of competence and skills of the respective pilots and is understood in a discriminating manner. The DAeC strongly recommended the name 'Light aircraft Pilots Licence' for the respective licences. As the term 'LPL' is included in the Basic Regulation, a change of this term will require a change to the Basic Regulation, however, this should be possible during the next changing of the Basic Regulation for extension of the competence of EASA	