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Title	Implementing Rules for Pilot Licensing - Part-FCL
NPA Number	NPA 2008-17b

Deutscher Aero Club has placed **47** unique comments on this NPA:


Cmt#	Segment description	Page	Comment	Attachments
4197	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.010 Definitions	3 - 5	<p>Comment:</p> <p>According to the definition, a Touring Motor Glider is a powered sailplane. The other types of powered sailplanes (which in JAR FCL are defined as Self Sustained Gliders and as Self Launching Gliders) are only defined by default, as being "non TMG" powered sailplanes. This leads to some ambiguities in the definition of privileges of the LPL(S) and SPL (See our comments on FCL.105.S, FCL.135.S, FCL 205.S and FCL.235.S) Therefore, DAeC believes that a clear definition of every type of powered sailplane should be included in the definitions.</p> <p>DAeC Proposal</p> <p>A powered sailplane is a glider equipped with an engine. There are three types of powered sailplanes:</p> <ul style="list-style-type: none"> • Touring Motor gliders (TMG) which have an integrally mounted, non-retractable engine and non-retractable propeller ... • Self launched gliders which have a retractable engine or a retractable propeller and are capable of taking off and climbing under their own power. When the engine is inoperative, they have the characteristics of a pure sailplane. • Self Sustained gliders which must be launched like a pure sailplane not equipped with an engine, but can climb slowly to extend a flight once the engine or the propeller is deployed and started. When the engine is inoperative, they have the characteristics of a pure sailplane. 	
3092	B. Draft Opinion Part-FCL -	5	<p>Comment:</p> <p>EU regulation 216/2008 already mentions that</p>	

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	Subpart A: General Requirements - FCL.015 Application and issue of licences, ratings and certificates		<p>qualified entities may deliver specific certification tasks for the competent authority. For clarification of the wording it is proposed that the text within FCL.015 should be amended as proposed below.</p> <p>Proposed wording: (a) An application for the issue, revalidation or renewal of pilot licences and associated ratings and certificates shall be to the competent authority, or to the appointed qualified entity, in a manner established by this authority. The application shall be accompanied by evidence that the applicant complies with the requirements for the issue, revalidation or renewal of the licence or certificate as well as associated ratings or endorsements, established in this Part and Part Medical.</p>	
3469	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.015 Application and issue of licences, ratings and certificates	5	<p>The meaning of the sentence is not fully understood. Does this mean that</p> <p>(a) a pilot can only hold one EU licence and that if it is a 'higher' licence for a particular aircraft category (e.g. glider) – i.e. an SPL gives the privileges also of a LPL(S)? or</p> <p>(b) a pilot can only hold one EU licence for a particular aircraft category (e.g. a SPL) and cannot have two licences (from different countries, for example for an SPL)? Or</p> <p>(c) a pilot who holds for example an ATPL also has on the licence a rating, for example, for the LPL(S)?</p> <p>DAeC assumes that this draft rule is intended to stop pilots holding a licence for the same aircraft category in more than one Member State. DAeC understands that this rule shall ensure a clear assignment of a pilot to the responsibility of the competent authority of only one member state.</p> <p>However, further clarification of the rule is necessary by e.g. the AMC material is necessary.</p>	
3098	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.020 Studien pilot	5	<p>DAeC strongly supports the proposed ages for first solo flights, in particular, an age of 14 for first solo flights for sailplanes and balloons. In many European countries, young people are successfully educated and trained in air sport clubs to fulfil the skills and knowledge for flying. It is highly supportive for the development of the sport activity gliding, to allow solo flying at an age, when young people are interested and enthusiastic for the adventure of</p>	

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			<p>flying. In those member states which allow solo flying in sailplanes at an age of 14, no adverse observations were made concerning accident rates with young people over the last 90 years.</p> <p>RIA: Social impact:</p> <p>Recruitment of pupils at an age of 14 allows a strong development of the gliding movement as at this age the interest for training in technical sports as flying is highly expressed. The education of young people represent a fundamental block to introduce and attach them to the field of aviation, in particular, to search their professional live in the respective businesses.</p> <p>In addition, these young people are important members for the gliding clubs as they represent multiplier for the sport and the clubs even though they leave them. They often return into the sport after a period of establishment of job and family and represent therefore an important pool of members and supporters of the gliding movement.</p>	
3465	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.025 Theoretical knowledge examinations for the issue of licences	5 - 6	<p>We believe that it should be possible to take the set of examinations for e.g. PPL (A) in one Member State and the CPL in another Member State some years later.</p> <p>Clarification required. If the draft rule means that the set of examinations have to be taken in one Member State is for one category or aircraft / licence, then its OK.</p> <p>If it means that the examinations for different categories or aircraft / licence have to taken in one (always the same) Member State then this is not acceptable.</p> <p>Reason – free movement.</p>	
3466	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.025 Theoretical knowledge examinations	5 - 6	<p>This paragraph is not fully understood. Clarification is needed concerning the meaning of "examination paper" or "subject". Definitions of these terms are required.</p> <p>DAeC understands the term "examination paper" as the written test of one subject e.g. meteorology. The term "subject" means in our understanding a topic of the syllabus e.g. meteorology. In the given form the wording is not clear to avoid differing interpretation.</p>	

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	for the issue of licences			
3094	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.055 Language proficiency	7 - 9	<p>(a) General,</p> <p>Comment: Although DAeC understands, that the basic regulation 216/2008 (Annex III , 1.f) requires that a pilot has to demonstrate language proficiency, it does not agree with this requirement. Language proficiency is only a recommendation by ICAO for gliding and therefore, this rule creates an unnecessary burden and barrier for glider pilots. The LPL and SPL should not have a requirement for language which is an RT matter not a pilot licence matter in gliding.</p> <p>Justification: The major amount of gliding in Europe is executed in airspace where communication with Air traffic control is not needed. The revalidation of the language proficiency endorsement would create unnecessary cost burden for the affected pilots and the language competence is satisfactory proven by an RT licence for the entry into respective airspaces.</p> <p>Comment The German Aero Club on considers a general language proficiency endorsement inappropriate for two reasons: a) language proficiency applies to a radio-telephony (R/T) licence, which is not mentioned, and b) an R/T licence is only required when radio communications with Air Traffic Services (ATS) are involved. For this reason glider pilots undergo R/T training and examination when they have the need to contact ATS, at an appropriate moment in their career as a glider pilot. Making R/T training a part of the LPL(S) or SPL will, because of its complexity, unduly delay the access to the LPL(S) or SPL. Furthermore cost plays an important role, obviously the more when a glider pilot, because of the airspace he flies in, has no need to contact ATS.</p> <p>Proposed text "Pilots who contact Air Traffic Services shall possess a radio-telephony licence in the language(s) available by the ground station(s) involved, in conformity with</p>	

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			Annex 1 of ICAO. For pilots who fly VFR only this licence shall encompass radio procedures as used in VFR flight only."	
3095	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.055 Language proficiency	7 - 9	<p>(b)</p> <p>Comment</p> <p>The German Aero Club supports the requirement of language proficiency tests as long as languages, other than the native languages are concerned. These language tests shall be in conformity with ICAO Annex 1. Language proficiency shall, however, be a part of the training for the R/T licence. A language test in other than native languages may be required at certain intervals after the R/T licence has been obtained, in conformity with ICAO Annex 1.</p> <p>Proposed text</p> <p>"The applicant for an R/T licence shall undergo language training as a part of his training for the licence. A language test in other than native languages may be required at certain intervals after the R/T licence has been obtained, in conformity with ICAO Annex 1.</p> <p>Reference</p>	
3096	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.055 Language proficiency	7 - 9	<p>(c)</p> <p>Comment</p> <p>The German Aero Club considers an interval of 6 years sufficient to maintain an acceptable level of language proficiency for holders of an ICAO type R/T licence for VFR flight only, at the same time saving time and cost. Moreover ICAO specifies that language proficiency checks are not required at all under certain circumstances.</p> <p>Proposed text.</p> <p>"In the case of R/T licences for VFR flight only a language proficiency check shall be undergone in principle at intervals of 6 years, as specified by ICAO."</p>	
3097	B. Draft Opinion Part-FCL - Subpart A:	7 - 9	FCL.055 (d) and (e) are not applicable to VFR flight.	

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	General Requirements - FCL.055 Language proficiency			
3099	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 2: Specific requirements for the Basic LPL - aeroplane and helicopter categories - FCL.110.BA/H Basic LPL - Experience requirements and crediting	12 - 13	<p>(c) Crediting. Applicants holding a pilot licence for another category of aircraft, with the exception of balloons, shall be credited with 10 % of their total flight time as pilot in command in such aircraft, up to a maximum of 3 hours, towards the requirements in (a) or (b) respectively 10 hours for glider pilots towards the requirements in (a).</p> <p>Justification As holder of a LPL(S) are already well trained, there is only marginal experience which has to be learned to gain the required skills, therefore a smaller crediting is illogical.</p>	
3467	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 2: Specific requirements for the Basic LPL - aeroplane and helicopter categories - FCL.135.BA/H Basic LPL - Extension of privileges to another class or type	13	<p>Considering the logic of the regulation, an extension of LPL(BA) also to TMG is intended. The wording using the word aeroplane does not allow an extension to TMG as this aircraft does not represent an aeroplane.</p> <p>To avoid misunderstandings the wording should be changed by adding TMG.</p>	
3009	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 2: Specific requirements	13	<p>The Deutscher Aero Club disagrees with proficiency checks proposed by NPA 2008-17b. To comply with the essential requirements lead down in annex III of the Basic regulation, the European Air Sport movement proposes check flights with FIs. Such check flights shall be endorsed in the logbook and shall be repeated every 24 month. No communication with the licensing authority should be required.</p>	fatalities gliding.pdf (37.5kb) 

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	for the Basic LPL - aeroplane and helicopter categories - FCL.140.BA/H Basic LPL - Recency requirements		A check flight is not a skill test therefore annex III 1.j.1 is not applicable as no skills are to be accessed. This means by performing check flights instead of proficiency checks the requirement pursuant to 1.c.2 and 1.e.2 of annex III can be fulfilled without involving Examiners but FIs.	
	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 3: Specific requirements for the LPL for aeroplanes - FCL.140.A LPL(A) - Recency requirements	14	Quote from JAR-FCL 1: "All Examiners must be suitably trained, qualified and experienced for their role on the relevant type/class of aeroplane. No specific rules on qualification can be made because the particular circumstance of each organisation will differ. It is important, however, that in every instance, the Examiner should, by background and experience, have the professional respect of the aviation community." Examiners shall conduct Skill tests (as defined in GM to FCL.010). Provided all national licenses was converted to licenses pursuant Part FCL during a time period of 1.5 years (12 April 2012 minus publication date in official journal) the complete population of pilots would have to be checked within 1.5 years in 2018, 2024, 2030 ...	
	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 4: Specific requirements for the LPL for helicopters - FCL.140.H LPL(H) - Recency requirements	15	Justification by using the RIA tool: <i>Safety impact:</i> Proficiency checks are not very common in the European gliding movement so far. Statistics about gliding accidents like the European Gliding Unions (EGU) compilation of fatal accidents per 100,000 launches over the last 10 years do not show any positive or negative effect of proficiency checks. In fact the influence of geographic specifics like mountains may have a much higher influence on accident rates as proficiency checks.	
	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.140.S LPL(S) -	16 - 17	Alternative proposal: same undefined impact. Statistics see attachment: fatalities gliding <i>Social impact:</i> Voluntarily check flights with a clubs FI are very common in the gliding movement e.g. when a new member joins the club or when pilot didn't flew for a	

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	Recency requirements		while. But all the time no authority is involved and there is no chance to fail the check. Exercises a	
	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 6: Specific requirements for the LPL for balloons - FCL.140.B LPL(B) - Recency requirements	17	simply repeated until the pilot is back on an appropriate level of competence. This system is well accepted by all pilots. Discussion with members during the last month showed that involuntarily checks like the proposed proficiency checks are not accepted by the community at all. This may be caused by the fact that prof-checks have to be done with Examiner and not the FI of the club who the pilots trust in. Also the fact that the authority has to be informed once a check is not passed and that the pilot has to undergo a special training at an ATO in such a case. The Deutscher Aero Club suggests continuing with a system which is close to the	
	B. Draft Opinion Part-FCL - Subpart C: Private Pilot Licence (PPL), Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) - Section 6: Specific requirements for the sailplane pilot licence - FCL.230.S SPL - Recency requirements	21	<p>voluntary system the pilots are used to.</p> <p>Quote from JAR-FCL 1: "All Examiners must be suitably trained, qualified and experienced for their role on the relevant type/class of aeroplane. No specific rules on qualification can be made because the particular circumstance of each organisation will differ. It is important, however, that in every instance, the Examiner should, by background and experience, have the professional respect of the aviation community."</p> <p>Alternative proposal: No negative impact.</p> <p><i>Economically impact:</i> Gliding sport is mainly performed from spring to autumn at weekends. Prof-checks at weekdays are nearly impossible due to the fact, that team is necessary to launch a sailplane. Therefore</p>	
	B. Draft Opinion Part-FCL - Subpart C: Private Pilot Licence (PPL), Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) - Section 7: Specific requirements for the	22	<p>prof-checks are possible at 52 to 72 days per year for 40.000 glider pilots of which 6700 have to be checked per year. Under the provision that an FE has to keep his/her FI-Licence valid and he/she may wants to fly for his/her one a FE is available for prof-checks at 3 to 5 days per year and will may perform two checks per day. This ends up in a minimum demand of 830 FE out of 6000 FI for Germany of which may 3000 fulfil the requirements for a FE standardisation course. For the time being a maximum 100 FE exits in Germany. It is easily to see that it's impossible to train 730 FE within the transition period of less than two years (present planning of EASAs rulemaking provided), as according to AMC 1 to FCL.1015 2.2 c</p>	

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	balloon pilot licence - FCL.230.B BPL - Recency requirements		not more than 4 candidates can be trained per course (2 practical test profiles have to be performed for which aircrafts are necessary). A professional (paid) FE could perform according to AMC to FCL.1015 up to 4 checks per day, but only during summer time due to daylight time restrictions during spring and autumn. Therefore he/she may be able to perform 186 checks per year provided there is no bad weather. Based on an income of 70,000 each check would cost 376 plus VAT, which is 30% of the average amount of money a glider pilot, spends per year for his/her activity.	
	B. Draft Opinion Part-FCL - Subpart H: Class and Type Ratings - Section 2: Specific Requirements for the aeroplane category - FCL.740.A Revalidation of class and type ratings - aeroplanes	37	<p>Alternative proposal: No negative impact.</p> <p><i>Environmental impact:</i> Due to the high demand of proficiency checks (6,700 per year German glider pilots only) and the low number of available FEs high travelling of applicants to the place of FEs can be expected. This will lead to an increase of resources consumption and carbon dioxide emission.</p>	
	B. Draft Opinion Part-FCL - Subpart H: Class and Type Ratings - Section 3: Specific Requirements for the helicopter category - FCL.740.H Revalidation of type ratings - helicopters	39	<p>Alternative proposal: No negative impact.</p>	
	B. Draft Opinion Part-FCL - Subpart H: Class and Type Ratings - Section 4: Specific Requirements for the powered-lift aircraft category - FCL.740.PL Revalidation	40		

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	of type ratings – powered-lift aircraft			
	B. Draft Opinion Part-FCL - Subpart H: Class and Type Ratings - Section 5: Specific Requirements for the airship category - FCL.740.As Revalidation of type ratings - airships	41		
	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.905.LAFI LAFI - Privileges and conditions	47		
	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.905.FI FI - Privileges and conditions	49 - 51		
	B. Draft Opinion Part-FCL - Subpart K:	64		

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	Examiners - Section 1: Common Requirements - FCL.1000 Examiner certificates			
	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1005 Limitation of privileges in case of vested interests	64		
	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1010 Pre-requisites for examiners	64		
	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1015 Examiner standardisation	64		
	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1020 Examiners assessment of	65		

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	<p>competence</p> <p>B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1025 Validity, revalidation and renewal of examiner certificates</p> <p>B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1030 Obligations for examiners</p>	<p>65</p> <p>65 - 66</p>		
3100	<p>B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 3: Specific requirements for the LPL for aeroplanes - FCL.110.A LPL(A) - Experience requirements and crediting</p>	13 - 14	<p>(d) Crediting. Applicants holding a pilot licence for another category of aircraft, with the exception of balloons, shall be credited with 10 % of their total flight time as pilot in command in such aircraft, up to a maximum of 6 hours respectively 10 hours for glider pilots, towards the requirement in (a).</p> <p>Justification: Holders of a glider licenses should be credited more. There is only little more that a glider pilot needs to learn to gain the required skills. Also it appears illogical that for B.FCL.110 BA/H (c) 3 hours should be credited and here 6 since the skills acquired on the glider are the same.</p>	
3468	<p>B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 3: Specific requirements for the LPL for</p>	14	<p>Considering the logic of the regulation, an extension of LPL(A) also to TMG is intended. The wording using the word aeroplane does not allow an extension to TMG as this aircraft does not represent an aeroplane. To avoid misunderstandings the wording should be changed by adding TMG.</p>	

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	aeroplanes - FCL.135.A LPL(A) - Extension of privileges to another class of aeroplane			
4205	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.110.S LPL(S) - Experience requirements and crediting	15	<p>Add:</p> <p>(c) Specific requirements for applicants holding a rating for TMG in another license. The applicant shall have completed 2 hours dual instruction and completed the requirements for one of the launch methods according to FCL.130.S</p> <p>Justification:</p> <p>DAeC means that the above proposal for holder of a TMG rating ensures an appropriate level of safety and allows a transfer into LPL(S) or SPL.</p> <p>Symmetrically to the requirement in FCL.110.A (c) a similar requirement is needed here for the vice versa situation. Since TMG is mentioned in FCL.110.S (a) the paragraph FCL.110.S (b) does not apply. But it also makes no sense to apply the requirements in FCL.110.S (a) if the applicant already has the rating for TMG.</p>	
4208	B. Draft Opinion Part-FCL - Subpart C: Private Pilot Licence (PPL), Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) - Section 6: Specific requirements for the sailplane pilot licence - FCL.210.S SPL - Experience requirements and crediting	21	<p>Paragraph (b) should read as following:</p> <p>(b) Applicants for an SPL holding a LPL(S) shall be fully credited towards the requirements in (a) and do not require a skill test pursuant to FCL.235.</p> <p>Justification:</p> <p>The difference between LPL(S) and SPL is the medical only. Therefore no skill test should be required.</p>	
3470	B. Draft Opinion Part-FCL -	37	DAeC does not agree with the time period for the performance of a Prof-check in a three months time period before expiry of the licence if the applicant	

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	Subpart H: Class and Type Ratings - Section 2: Specific Requirements for the aeroplane category - FCL.740.A Revalidation of class and type ratings - aeroplanes		was not able to fulfil the requirements given under (ii). DAeC proposes that the period preceding the expiry date should be 12 months.	
4277	B. Draft Opinion Part-FCL - Subpart I: Additional Ratings	42	The DAeC disagrees with the withdrawal of the cloud flying rating for sailplanes. No accident occurred by exercising this privilege during the last decades. We support the implementation of the working group FCL.008 to find an adequate solution.	
3471	B. Draft Opinion Part-FCL - Subpart I: Additional Ratings - FCL.800 Aerobatic rating	42	<p>The requirement for 5 hours of dual aerobatic instruction time is too stringent. Particularly in glider aerobatics this requirement is almost impossible to fulfil, since the time available for aerobatic training after release is mostly less than 4 minutes per individual flight. It is foreseeable that with such requirement in force glider aerobatics instruction will come close to the "brick of extinction" for reasons of costs. Experience of nearly 40 years of glider aerobatics instruction has shown that on an average 7 up to 10 flights of dual instructions are needed for an average glider pilot to perform glider aerobatic solo flights satisfactorily and safely under supervision. In addition, training flights under supervision of a flight instructor should be possible to allow the use of single seater in aerobatic training.</p> <p>Proposed change: (3) 5 hours aerobatic instruction time, if applicable. For sailplanes, 10 flights of dual glider aerobatic instruction.</p>	
4219	B. Draft Opinion Part-FCL - Subpart I: Additional Ratings - FCL.805 Sailplane towing and banner towing	42	<p>Proposed wording:</p> <p>(b) Applicants for a towing rating shall have completed:</p> <p>(1) at least 75 hours of flight time as pilot-in-command for the banner towing rating or 50 hours of flight time as pilot-in-command for the sailplane towing rating. At least 30 of these hours shall be in aeroplanes, if the activity is to be carried out in</p>	

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	Section 2: Specific requirements for the light aircraft flight instructor - FCL.905.LAFI LAFI - Privileges and conditions		Since the skills for an LPL(S) and an SPL are identical it is illogical that a LAFI can not also function as instructor for SPL pilots.	
4222	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.905.LAFI LAFI - Privileges and conditions	47	<p>Comment: Number of launches is missing</p> <p>Proposal: (1) In the case of a LAFI for sailplanes or balloons, at least 50 hours of instruction (or 150 launches for a LAFI(S)) in the appropriate aircraft category;</p> <p>Justification: In case of sailplanes number of launches is appropriate criterion.</p>	
	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.905.FI FI - Privileges and conditions	49 - 51		
4223	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.905.LAFI LAFI - Privileges and	47	<p>Proposal (f)(2) for all other aircraft categories, has completed at least 100 hours of flight instruction. Of the 100 hours 50 hours of instruction shall be on the respective aircraft category.</p> <p>Justification: This would not allow to recruit sufficient number of instructors for LAFI certificates in the voluntarily organised environment of air sports. Credit must be given for instruction in other aircraft categories, as instructor skills are common across the categories. It is not appropriate that a person who has already</p>	

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	<p>conditions</p> <p>B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.905.FI FI - Privileges and conditions</p>	49 - 51	<p>instructed many hours on sailplanes is required to demonstrate the same number of instructing hours as a newcomer.</p>	
4226	<p>B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.910.LAFI LAFI - Restricted privileges</p>	47	<p>Proposal:</p> <p>(b)(3) In the case of a LAFI for sailplanes, at least 15 hours or 50 launches of flight instruction covering the full flight training syllabus...</p> <p>Justification:</p> <p>Same requirements as for the FI.</p>	
4230	<p>B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.915.LAFI Pre-requisites for the LAFI training course</p>	47 - 48	<p>Proposal</p> <p>(b)(1) received at least 3 hours of simulated instrument flying in a single-engine piston aeroplane,</p> <p>Justification:</p> <p>The wording "instrument flight instruction" would require a two complex infrastructure and would exclude instruction on TMG. It should be possible to conduct this instruction under simulated conditions. It should neither be necessary to use a fully IFR certified aeroplane, nor to do it at an FTO which is approved for IFR training nor to require an IFR instructor. Especially it should be possible to conduct this on a appropriately but not fully IFR equipped TMG for instructors who only intend to instruct on TMG.</p>	
4232	<p>B. Draft Opinion Part-FCL - Subpart J:</p>	47 - 48	<p>Proposal</p> <p>(b)(4) completed at least 5 hours of flight time on a single-engine piston aeroplane or TMG during the six</p>	

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	Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.915.LAFI Pre-requisites for the LAFI training course		<p>months preceding the pre-entry flight test set out in (a);</p> <p>Justification: This requirement as worded in the NPA does not allow instructors holding TMG rating only. The Basic LPL license and LPL license can be issued with either TMG or single engine piston rating. These ratings are symmetrical and equivalent. There must therefore be an option of a LAFI with only a TMG rating who intends to instruct only for basic LPL or LPL licenses on TMG. In Germany there are many training organisations that instruct solely on TMG.</p>	
4243	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.930.LAFI LAFI - Training course	48 - 49	<p>Proposal: (3) (i) for the LAFI for aeroplanes: at least 10 hours of dual flight instruction, of which 3 hours may be conducted in a FSTD;</p> <p>Justification: The requirement of 15 hours is not proportionate. 10 hours of flight instruction is completely sufficient.</p>	
4244	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.930.LAFI LAFI - Training course	48 - 49	<p>Proposal (a)(4) Pilots holding a LAFI or a FI certificate of any category of aircraft shall be credited with 30 hours towards the 50 hours in (a)(1) and 15 hours in a(2). (5) Pilots holding a LAFI or FI for sailplanes shall be credited with 5 hours against (a)(3)(i)</p> <p>Justification Applicants which already hold an instructor license must be credited significantly more.</p>	
4246	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light	48 - 49	<p>Proposal Add: (b)(4) Pilots holding a LAFI or FI for aeroplanes or an FI for 3 axis controlled microlights shall be credited with 5 hours or 10 launches against (b)(2)(i)</p> <p>Justification Applicants who already hold an instructor certificate shall be credited stronger</p>	

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			<p>of the certificate.</p> <p>Justification: The proposed numbers for flight instruction times shall be sufficient to maintain the necessary skills for the instructor certificates. As instruction for the different aircraft represents a competency that is used for the different aircraft in a comparable manner it is illogic not to credit the requirements between the different certificates for revalidation.</p> <p>To allow further and improved development of air sport on a club based non profit level, such unnecessary burden should be avoided.</p>	
4225	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.910.FI FI - Restricted privileges	51	<p>Proposal:</p> <p>An FI shall have his/her privileges limited to not acting as an instructor for first solo flights and first solo navigation flights...</p> <p>Justification:</p> <p>Same requirement as for the LPL.</p>	
4250	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.910.FI FI - Restricted privileges	51	<p>Proposal</p> <p>(c)(1) For FI(A), 45 hours flight instruction in aeroplanes or TMG and, in addition has supervised at least 25 student solo flights;</p> <p>Justification</p> <p>100 hours instruction time are too burdensome and are not necessary to ensure a training representing the syllabus. 45 hours is the amount of hours to train one student.</p>	
4254	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.915.FI Pre-requisites for the FI	51 - 52	<p>Proposal</p> <p>(c)(2) have completed at least 5 hours on singleengine piston powered aeroplanes or TMG during the 6 months preceding the preentry flight test set out in (a) above;</p> <p>Justification</p> <p>This requirement as worded in the NPA does not allow instructors with TMG rating only.</p>	

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	training course			
4264	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.930.FI FI -Training course	52	<p>Proposal</p> <p>(1) (i) In the case of an FI (A), (H) and (As), at least 80 hours of theoretical knowledge instruction, including progress tests;</p> <p>(2) (i) In the case of an FI (A) and (H), at least 15 hours of flight instruction, of which 12 hours shall be dual instruction, of which 3 may be conducted in a FFS, an FNPT I or II or an FTD 2/3;</p> <p>Justification: Compared to present requirements in Germany the requested theoretical and practical training is inappropriate high. The experience during the last decades did not show any safety hazards with lower requirements.</p>	
4268	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.930.FI FI -Training course	52	<p>Proposal: Add: A holder of an SPL and a LAFI(S) applying for an FI(S) is fully credited.</p> <p>Justification: Theoretical and practical requirements for both licenses are completely identical.</p>	
4270	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 1: Common Requirements - FCL.1005 Limitation of privileges in case of vested interests	64	<p>(a)(3) DAEC proposes 300h flight time and 90h flight instruction</p> <p>Justification: The proposed requirements are too demanding and it is not necessary to ensure an acceptable level of safety. The alternative proposal will allow an adequate competency of an applicant to perform skill tests and proficiency checks.</p> <p>Alternative proposal: No negative impact.</p>	
4271	B. Draft Opinion Part-FCL - Subpart K: Examiners -	64	<p>Comment: Considering the logic of the regulation, the crediting of the flying of TMG is intended in the PPL(A).Therefore, the use of TMG has to be possible</p>	

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	Section 1: Common Requirements - FCL.1005 Limitation of privileges in case of vested interests		<p>as accepted provision for the FE. The wording using the word aeroplane does not allow an extension to TMG as this aircraft does not represent an aeroplane. To allow this aircraft in this paragraph EASA should change the wording by adding TMG.</p> <p>Proposal: The pre-requisite for the FE (1) skill tests for the issue of the PPL(A) and skill tests and proficiency checks for associated single pilot class and type ratings, provided that the examiner has completed at least 1000 hours of flight time as a pilot of aeroplanes or TMG, including at least 250 hours of flight instruction;</p>	
3015	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 2: Specific requirements for flight examiners - FCL.1005.FE FE - Privileges and conditions	66 - 67	<p>The requirements are too high therefore too few FIs are able to meet these requirements to satisfy the demand of FEs. It's not feasible that the requirements for conducting skill test are lower than for proficiency checks. Usually a person assessing weather a candidate meets the skills for issuing a new license has more responsibility as a person checking weather a pilot has maintained his/her competence.</p> <p>RIA</p> <p><i>Social Impact:</i> Quote from JAR-FCL: "All Examiners must be suitably trained, qualified and experienced for their role on the relevant type/class of aeroplane. No specific rules on qualification can be made because the particular circumstance of each organisation will differ. It is important, however, that in every instance, the Examiner should, by background and experience, have the professional respect of the aviation community." The draft rule doesn't consider this mean principle about Examiners.</p> <p><i>Economical Impact:</i> In Germany no proficiency check exists so far. Therefore the full necessary amount of FE appropriate to check roundabout 80,000 pilots has to be qualified in the next couple of years. For instance the cost for a FE training course at the JAA Training Centre is 1250 Euro. It's easily to see that the economical</p>	

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			impact of the draft IR on FCL is exorbitant.	
3016	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 2: Specific requirements for flight examiners - FCL.1005.FE FE - Privileges and conditions	66 - 67	<p>Add: The privileges of a FE are to conduct proficiency checks with FI, provided the FE has passed his/her first validity period.</p> <p>Justification see comment 3009.</p>	
3018	B. Draft Opinion Part-FCL - Subpart K: Examiners - Section 7: Specific requirements for the flight instructor examiner - FCL.1010.FIE FIE - Pre-requisites	71	<p>This rule says among others that an applicant for the FIE certificate has to train applicants for a FI certificate during an approved FI training course. This is a requirement that the air sport community is unable to fulfil and which will decrease the level of safety in FI training.</p> <ol style="list-style-type: none"> 1. For the time being about 30 FIE exist in Germany, but there are about 6000 FI to check. 2. Therefore there is high demand to "create" much more FIE as fast as possible. 3. Volunteers perform the training of FIs in their spare time (holidays). 4. There are not more as 6 FI training courses for sailplane and 2 for aeroplane per year and 1 for balloons every three years in Germany. 5. Under normal conditions it would be possible to train one applicant for the FIE certificate per FI training course. 6. But under the condition pursuant to 2 it would be necessary to exchange the complete set of FI instructors to produce as much as possible FIEs. 7. This contradicts the need to involve the best-qualified FI instructors to achieve the highest possible level of quality and safety during such a course. 8. The result is a decrease in level of safety. Quod erat demonstrandum. <p>Please refer to comment #3019 to AMC to FCL.1020. This AMC requires having three persons on board of</p>	

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			an aircraft during the assessment of competence of a FIE. As no sailplane with three seats exists that requirement can't be fulfilled.	
3093	B. Draft Decision Part-FCL - AMC and GM - Subpart A: General Requirements - AMC to FCL.050 Recording of flight time	173 - 181	The proposed format of the log book is not appropriate for gliding due to an overload of details not related to this activity. DAeC proposes to allow a reduced log book format in the AMC adapted to the specific requirements for gliding and/or ballooning to ensure flexibility for the different activities.	
4210	B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.800 - Aerobatic Rating - Theoretical knowledge and flying training	385 - 386	<p>Comment:</p> <p>As the approved training organisation shall have the responsibility to evaluate the satisfactory completion of the training by the applicant, it is an unnecessary additional requirement to perform the endorsement of the licence by anyone. DAeC interprets, that in this context the competent authority is meant.</p> <p>Proposed changes: The licence endorsement for the successful completion of the aerobatic training shall be performed by the responsible approved training organisation.</p> <p>Justification: The proposed procedure avoids additional bureaucratic and financial burden.</p>	
4212	B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.800 - Aerobatic Rating - Theoretical knowledge and flying training	385 - 386	<p>Comment:</p> <p>Add to paragraph 4.1</p> <p>Inverted flight Stall turn</p> <p>Justification: It is recommended to add the manoeuvres "Inverted flight" and "Stall turn" to the list. Ability to fly inverted safely is elementary to perform rolling manoeuvres. It should be a requirement for the aerobatic rating whenever the respective aircraft is certified to perform inverted flight. Stall turns are among the most common aerobatic figures and should be included in the aerobatic instruction whenever possible.</p>	

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			<p>Delete from paragraph 4.1:</p> <p>Inverted loop</p> <p>Justification</p> <p>Inverted loops should be deleted as such manoeuvres belong to the category of "Unlimited" aerobatic figures.</p> <p>Inverted loops are fare beyond the airworthiness limitations (envelope) of gliders used for basic aerobatic training.</p> <p>Due to the health hazard performing such an extreme figure with a high load factor (-3.5 g) over a long time period (> 20 sec) is not reasonable to implement this in to basic aerobatic training.</p>	
3019	B. Draft Decision Part-FCL - AMC and GM - Subpart K: Examiner Certificates - AMC to FCL.1020 - Assessment of competence	580 - 582	<p>Quote from draft rule: "An inspector of the Authority, or a senior examiner, will observe all examiner applicants conducting a test on a 'candidate' in an aircraft for which examiner certificate is sought."</p> <p>This means three persons on board. Is the Agency aware of the fact that no sailplane exits with a capacity of more than two persons? That's even not covered by CS-22. It seems that the requirements above was copy and paste from current JAR-FCL regulations without considering the specifics of other aircraft categories.</p> <p>A high number of aeroplane used by flight training organisations are also two-seater (Aquila A210, Katana, Cessna 152).</p> <p>Discussions with existing inspectors discovered that they are not willing to enter an aircraft for the purpose of conducting such an assessment without having access to the controls. The reason for the prof/skill-check is the fact, that an Examiner is my not yet or not anymore competent to fulfil is duties. This means if the Examiner's reactions are inappropriate the Inspector must have access to the controls to recover the situation, especially as the Inspector has overall responsibility. Hint: In e.g. an Airbus it is possible to change seats during flight, but in a small aircraft that's impossible.</p>	

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