

Correction to Conversion Report of Licenses and Transition Method of the
Federal Republic of Germany
With regard to the Commission Regulation (EU) Nr. 1178/2001
Article 4

1. Introduction

Due to a fault in the interpretation of the end dates for the respective opt-out and a resulting miscommunication within the division it was assumed, that the opt-out date was the start date for conversion of licenses. This mistake was discovered and formally corrected by communication from the agency, head of rulemaking directorate.

2. Course of action

It is requested that EASA should exchange the wording “starting on” by the wording “until” in the conversion reports Germany for airships, balloons, sailplanes, Instructor for airplanes (FI(A)), airships (FI(As)), sailplanes and balloons (FI(S) and FI(B)). Further it is requested to exchange the wording “may after” by the wording “until” in the conversion reports for the PPL (A) according to ICAO and national rules as well as the PPL (H) according to ICAO rules.

Paragraph 5 d. in the conversion report Germany is to be changed as follows:

- d. Up to 8th April 2018 there will still be license holders carrying JAR-FCL compliant licenses, which are valid up to that point. Renewal of existing non JAR-compliant licenses will be according to Part-FCL regulations and be completed by the dates given in the conversion reports.

3. New Issues

- a. Test Pilot ratings were issued according to national law valid before 2003 but not further on under the JAR-FCL regime in Germany. However, test pilot training was formally conducted in some non approved training organizations. Achieved qualifications were recognized as being adequate to perform test pilot duties. Also formal training in existing test pilot schools within and outside the territory of the member states was conducted and the qualifications were recognized as ratings issued by third countries.

Germany will recognize the respective previous national ratings and issue Part-FCL ratings until 08th April 2015 in accordance with Regulation (EU) Nr. 1178/2011 FCL.820.

Germany will recognize meanwhile achieved Test Pilot qualifications by a formal approval as training received in accordance with Regulation (EU) Nr. 1178/2011 FCL.820. and issue Part-FCL ratings until 08th April 2015 after examination by the German Civil Aviation Authority (LBA) if no examination at the end of the Test Pilot training can be shown.

As Germany never had formal ratings as Flight Test Instructor like those mentioned in Regulation (EU) Nr. 1178/2011 FCL.905.FTI, Germany will recognize respective qualifications and issue Part-FCL ratings until 08th April 2015 after evaluation on an individual basis by the German Civil Aviation Authority (LBA) and formal approval as training received in accordance with Regulation (EU) Nr. 1178/2011 FCL.905.FTI

(for further details see attached conversion report Test Pilot Qualification).

- b. Germany will convert sailplane licenses until 8th April 2015 into Part-FCL licenses according the given conversion report. Recency requirements for sailplane licenses under Part-FCL call for 2 training flights with a flight instructor or a proficiency check with an examiner or flights under supervision of a flight instructor to fulfill the full recency requirements. German national law called for a higher number of launches (25 vs 15 in Part-FCL) to fulfill recency requirements but did not require flights with a flight instructor. Due to a limited amount of dual seated sailplanes and a restricted number of instructors and examiners in the German sailplane clubs, where most of the sailplane flying takes place, the recency requirements of sailplane pilots will be to the full extend according to Part-FCL by 8th April 2017. With the higher number of launches required according to national law versus regulation (EU) Nr. 1178/2011 the same level of safety can be guaranteed until conversion is completed.

Yours sincerely
By order

Bernhard Hey