

Comment/Response Document NPA-FCL-12

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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General

12.20	DGAC - France	Verify that the helicopter specificity is noted everywhere, especially dealing with licences (PPL(H), CPL(H), ATPL(H)....)		Noted. To be checked during creation of change one version of JAR-FCL 2
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JAR-FCL 2.017

12.13	RLD – The Netherlands	Delete the words “IMC flying”	The rest of the examples are non-JAA regulated ratings. Flying under IMC is already regulated by the JAA instrument rating	Rejected, flying under IMC is allowed under national regulations in different JAA Member States. Subpart E is only applicable to flights under IFR.
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JAR-FCL 2.025(b)

12.11	The Helicopter Club of Great Britain - United Kingdom	The validity date of proficiency checks should run to the end of the calendar month during which the anniversary falls, and not to a specific date.	This change is necessary to align with JAR-OPS 3.	Rejected, was not part of this NPA
12.23	British Helicopter Advisory Board - United Kingdom	The validity date of all proficiency and medical checks should run to the end of the calendar month during which the anniversary falls, and not to a specific date.	a.To align with JAR-OPS Part 3. b.To continue current UK practice. c.To avoid dates creeping forward. Unless checks are validated in the way proposed the practical effect	Rejected, was not part of this NPA

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			will be to require a pilot to have a check or test ever 5½ or 11½ months, instead of 6 or 12 months. This would be unnecessarily wasteful and expensive.	

Appendix 1 to JAR-FCL 2.050

12.22 and 12.52	CAA - United Kingdom	See text below.	The current and proposed text does not address the bridging instruction or examination requirements for aeroplane pilots seeking PPL(H)s only (see JAR-FCL 2.050(b)(2)(i)). [Note : This comment presumes that the revised PPL examination subject breakdown proposed in NPA 10 for aeroplanes will also be adopted for the PPL(H)].	Accepted, if reciprocity is applicable with JAR-FCL 1.
<p>Insert before existing text from NPA-FCL 8 and amendments to that text in this NPA :</p> <p>"1. The holder of an aeroplane licence for the issue of a PPL(H):</p> <p>From AMC-FCL 2.125 Syllabus of theoretical knowledge for the Private Pilot Licence(Helicopter) all topics under the following subject heading :</p> <p>Air Law; Aircraft General Knowledge; Flight Performance and Planning; Operational Procedures and Principles of Flight.</p> <p>Applicants shall pass a theoretical knowledge bridge examination in Air Law and ATC Procedures as determined by the Authority and PPL(H) theoretical knowledge examinations in the other subjects (see JAR-FCL 2.130).</p> <p>2. The holder of an ATPL(A) for the issue of a CPL(H) or an ATPL(H) and the holder of a CPL(A) with the ATPL(A) theoretical knowledge credit for the ATPL(H) : "</p>				

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JAR-FCL 2.055

12.28	FOCA – Switzerland	The NPA text at page 5 of NPA-FCL 12, paragraph (a)(2) : (see Appendix 1c to JAR-FCL 1.055(a)(2) (to be developed) should read :(see Appendix 1b to JAR-FCL 2.055 (to be developed)	Editorial correction	Partly accepted, should read Appendix 1c to JAR-FCL 2.055.
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Appendix 1a and 2 to JAR-FCL 2.055

12.14	RLD – The Netherlands	Propose a different text to paragraph 3 of the Appendices. The proposed text : If an inspection of the facilities outside the JAA Member State is required, the expenses of travel, hotel, etc., are on the account of the FTO/TRTO seeking approval.	In order to maintain a fair competition among FTOs and TRTOs, all Authorities should pass on the costs that are associated with obtaining an approval to that organisation seeking the approval. An inspection outside a JAA Member State could other wise put an undue financial and personal burden on an Authority.	Rejected, for consistency reasons with JAR-FCL 1.
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12.34	CAA – United Kingdom	The opening sentence is confusing. Does it mean FTOs who partly offer training outside the JAA Member State (but within another JAA Member State) or does it mean training done partly outside the JAA altogether.	Clarification required.	Rejected, for consistency with JAR-FCL 1.
12.53	CAA – United Kingdom	Delete proposed sentences in : - Appendix 1a to JAR-FCL 2.055, paragraph 9, 2 nd paragraph - Appendix 2 to JAR-FCL 2.055, paragraph 8, 2 nd sentence	The existing text is sufficient as it is. There is no need to be more prescriptive.	Rejected, not a helicopter specific item.

IEM FCL 2.055

12.54	CAA – United Kingdom	The Quality System for FTOs/TRTOs, Section 1, Terminology, Definition of Accountable Manager In 2 nd line delete ‘...financed and...’.	The definition in this IEM is guidance intended to assist training organisations to put in place quality systems relating to the running of courses. In this context reference to responsibilities for finance is inappropriate.	Rejected, not a helicopter specific item.
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Appendix 1 to JAR-FCL 2.075

12.55	DGAC – France	See page 4 of the Appendix The type rating endorsement should be completed by the mentions (SPH) or MPH to identify that the type rating is single-pilot or multi-pilot.	Many helicopters can be certificated as either single-pilot or multi-pilot depending on the type of operation. Therefore two type ratings are possible for the same helicopter. The proposed change will avoid any confusion on whether the type rating relates to single-pilot or multi-pilot operation.	Comment was received after the closing date, must be dealt with at next meeting. Commentor to provide Working Paper for basis of discussion at next meeting.
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JAR-FCL 2.125

12.15	RLD- The Netherlands	To delete the new amendment “ <i>to include at least 5 hours instrument dual instruction time.</i> ”	I suppose this addition is mistakenly placed in this paragraph. I feel it should have been placed under Night Qualification, part 2, as it is a requirement for the applicant who hold or has held an IR(A). It ca not be intended that in contrast to JAR-FCL 1, for Helicopters, 5 hours instrument dual instruction are mandatory in order to obtain a PPL.	Rejected, FCL Helicopter SubCommittee is of the opinion that due to the instability of helicopter a minimum amount of flight hours should be required.
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12.40	CAA – United Kingdom	Proposed amendment to paragraph (c)(2) in bold below (2) An applicant who holds, or has held, an IR(A) shall complete in accordance with Appendix 4 to JAR-FCL 2.215 exercise 4 to 6 in full , and shall complete a minimum of 5 hours helicopter dual instrument instruction time for exercises 1 to 3 at the discretion of a FI.	Clarification. It is presumed that IR(A) holders are required to complete the full 5 hours to cover exercises 4 to 6. The second proposed amendment clarifies that the 5 hours must cover actually dual instrument instruction relevant to the qualification being sought.	Rejected, the introduction of in full . Accepted, the introduction of for exercises 1 to 3 , but with text change : "from exercises 1 to 3"

Appendix 4 to JAR-FCL 2.125

12.21	DGAC – France	On the third bullet, we propose to replace the propose text by : <i>"explain and demonstrate night take-off techniques"</i> .	Vertical transition is not the only night take-off technique.	Accepted, delete (vertical transition). And change text as proposed.
12.27	European Helicopter Association	(page 25 NPA-FCL 12) Exercise 23 / 24 Delete : Running Take Off	Not a normal practice recommended in HFM.	Accepted, delete from AMC FCL 2.125 exercise 23 and 25 : "Running Take off" as proposed
12.41	CAA – United Kingdom	Propose different text to : a. Paragraph 9. After "... At least 10 hours" insert "...dual..". b. Paragraph 10. After "...at least	Clarification. The existing reference to instruction is confusing since instruction is not a JAR-FCL defined term – dual instruction is. The additional text to paragraph 10 further clarifies that the 5 hours is a	a.Accepted. b.Partly accepted. Paragraph 10 should read : 10. Exercises 4 to 6 of flying training syllabus shall comprise at least 5 hours,

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		5 hours...." insert "...and solo/SPIC practice."	combination of dual instruction and solo/SPIC practice.	<i>including at least 3 hours dual instruction and 5 solo night circuits. Each circuit shall include a take-off and a landing.</i>
12.42	CAA – United Kingdom	Propose different text to paragraph 11, exercise 5 : After "...solo night circuits..." insert "...(minimum of 5)...."	It is reasonable to require the applicant to complete a minimum number of solo night circuits otherwise he/she might only complete 1.	Accepted, covered by text change in response to comment 12.41.

AMC FCL 2.125

12.1	CAA – Finland	Propose different text to Exercise 11b : The steep approach (explain danger combination of high sink rate and low air speed)	In steep approaches there is always a high risk of "setting with power" or "vortex ring" what ever term is used but it is always a combination of high rate descent and low forward airspeed just a high rate of decent it's not dangerous. This combination is very important for inexperienced pilots to understand.	Accepted.
12.2	CAA – Finland	Propose addition to text Exercise	If "vortex ring" gets fully developed	Partly accepted, the proposed 1500 ft

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		15. Add at (altitude min 1500 ft AGL).	and with inexperienced instructor you really need altitude to recover, most Helicopter manufacturers recommend min. altitude for practice vortex ring at 2000 ft.	not accepted. Text to be changed in (add in exercise 15) bullet # 4 add (from a safe altitude).
12.3	CAA – Finland	Propose different text to Exercise 23 : Cross wind and downwind landings (terminate into wind)	Practice of downwind landings can give a wrong signal to PPL pilot that it is safe to land into downwind , since all landings must be learned to do head wind or at least terminating into wind. In helicopters very seldom you must make downwind landing and nearly always it can be terminated into wind.	Rejected, concern noted, but the FCL Helicopter SubCommittee is of opinion that students have to be instructed in all helicopter specific exercises.

Appendix 1 to JAR-FCL 2.130& 2.135

12.43	CAA – United Kingdom	At end of paragraph 14 insert "The skill test may be conducted in 2 flights."	Alignment with CPL(H) skill test.	Accepted.
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Appendix 2 to JAR-FCL 2.135

12.16	RLD – The Netherlands	Delete "M" see section 2 item m.	Limited power take-off is not defined	Rejected, since this is a common training practice for helicopter pilots.
12.17	RLD – The	Propose text :		Rejected, because autorotative landing is

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	Netherlands	"P : Autorotation with power recovery"		covered under items n and o of section 2 of the skill test/proficiency check.
12.44	CAA – United Kingdom	<p>General comment :</p> <p>Note 2 to Section 5 in both appendices stipulates that the FE shall select a minimum of 4 items from items (a) to (g) refers to other abnormal and emergency procedures as outlined in the appropriate flight manual and with reference to Appendix 3 to JAR-FCL 2.240, sections 7 and 8</p> <p>The total number of procedures to be covered overall is therefore open ended and this could lead to inconsistency in testing. Although the number of items covered may well vary according to the type used should an overall limit on the number of items selected ?</p>		<p>Accepted, delete " a minimum of " in note 2 to Section 5.</p> <p>This is also applicable to Appendix 2 to JAR-FCL 2.170, CPL(H) skill test, section 5.</p>

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Appendix 2 to JAR-FCL 2.170

12.4	CAA – Finland	Propose a different text to section 2 item g. Quick stops headwind, crosswind or downwind (terminate into wind)	Performing quick stops into downwind it must be terminated into wind as it is written in AMC FCL 2.125 exercise 21. Proposed text allows Flight Examiner pick what he or she prefers, headwind, crosswind or downwind but always terminating safely into wind.	Rejected, procedures are given in the relevant course. Examiners are expected to test in accordance with published procedures.
12.18	RLD – The Netherlands	Delete "M"	Limited power take-off is not defined	Rejected, since this is a common training practice for helicopter pilots.
12.19	RLD – The Netherlands	Propose text : "P : Autorotation with power recovery"		Rejected, because autorotative landing is covered under items n and o of section 2 of the skill test/proficiency check.

JAR-FCL 2.185

12.45	CAA – United Kingdom	Propose different text to paragraph (c) : In last line delete "...unsuccessfully been completed." And insert "...been passed."	For the avoidance of doubt. A check can be completed, that is all sections taken, without all sections being passed. It is the pass that matters.	Rejected, actual text is in line with JAR-FCL terminology.
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Appendix 1 to JAR-FCL 2.210

12.35	CAA – United Kingdom	Reinstate the words " <i>normally be required to</i> " which were proposed to be deleted.	If a pilot is sitting his initial issue of his IR(H) in a multi-pilot helicopter (as a co-pilot), the deletion of these words removes the facility for newly qualified co-pilots to sit their initial IR(H) from the normal co-pilot seat and forces them to fly the helicopter from a seat with which they may not be familiar.	Rejected, this was not the intention of this NPA. The case is still possible and covered by the existing text. See the words " <i>where the pilot-in-command functions</i> ".
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JAR-FCL 2.220

12.46	CAA – United Kingdom	Delete paragraph (d) entirely.	Irrelevant text. JAR-FCL 2 is concerned only with helicopters not autogyros. Note that if this paragraph is retained the correct term to use is "gyroplane(s)" – see JAR-1.	Rejected, but "autogyro" to be replaced by "autogyro/gyroplane" as editorial.
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Appendix 1 to JAR-FCL 2.220

12.25	European Helicopter Association	On page 65 in table under Ministry of Russia replace SE Turbine by ME Turbine.	The Kamov 32 is a multi-turbine helicopter as well all other MI types listed after.	Accepted, and for Kamov KA 26 D delete SE piston and insert ME piston
12.29	FOCA – Switzerland	The NPA text at page 65 of NPA-FCL 12, below title “Ministry of Aviation Industry of Russia”, second line column 1, - SE Turbine -, has to be changed.	The Kamov KA32 is a Multi Engine Helicopter.	Accepted
12.30	FOCA – Switzerland	The NPA text at page 64 of NPA-FCL 12, below title “Kaman”, first line column 1, ME Turbine , has to be changed... SE Turbine.	The Kaman K 1200 is a Single Engine Helicopter.	Accepted, delete ME and insert SE
12.36	CAA – United Kingdom	a.The helicopter type EH 101 is missing from the table. b.Westland S55 SE piston + SE turbine have same licence designation	a. The EH 101 should be in the table b. Piston + Turbine helicopters MUST have different licence endorsement.	a.Accepted, EH Industries EH 101 to be included in the helicopter type rating list b.Accepted, insert (D) for differences training in column 3 of the helicopter type rating list.

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JAR-FCL 2.240

12.48	CAA – United Kingdom	Propose different text to paragraph (a)(3) NPA-FCL 8 has already introduced new paragraphs (a)(3) and (a)(4). Paragraph numbering needs adjusting.	Editorial	Accepted, editorial
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JAR-FCL 2.245(b)(3)

12.26	European Helicopter Association	In (b)(3) replace 5 by 3 in the fifth line.	Three hours as PIC should be enough on a basic helicopter.	Partly accepted, and reduced to 2 hours
12.37	CAA – United Kingdom	Include at the end of the paragraph, the following additional text : <i>"This check shall not be flown on the same type consecutively".</i>	This will prevent pilots from flying the same helicopter type year after year for the proficiency check.	Rejected, proposed text is insufficient and the consequence are of unforeseen nature.

JAR-FCL 2.245(d)(2)

12.38	CAA UK	Subparagraph (d)(2) 3 rd line, replace the word "aeroplane" with "helicopter".		Accepted, editorial.
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Appendix 1 to JAR-FCL 2.245(b)(3)

12.12	The Helicopter Club of Great Britain – United Kingdom	Propose different text. Cross crediting of proficiency checks for revalidation of type ratings should not be limited to single engine piston helicopter types, but should include all single engine types, both piston and turbine.	Proficiency checks judge the pilot's ability in handling, airmanship and other general flying skills. The imposition of type specific checks would be significant and unnecessary burden on both private and commercial pilots, for no significant safety gain. Single engine types are simple, and the annual hours flown requirement is quite sufficient to maintain type related proficiency.	Noted, not part of this NPA. Commentors may provide a Working Paper to be provided for further discussions in the FCL Helicopter SubCommittee.
12.24	British Helicopter Advisory Board – United Kingdom	General comment. Cross crediting of proficiency checks for revalidation of type ratings should not be limited to single engine piston helicopter types, but should include all single engine types, both piston and turbine.	Proficiency checks judge the pilot's ability in handling, airmanship and other general flying skills. The imposition of type specific checks would be significant and unnecessary burden on both private and commercial pilots, for no significant safety gain. Single engine types are simple, and the annual hours flown requirement is quite sufficient to maintain type related proficiency.	Noted, not part of this NPA. Commentors may provide a Working Paper to be provided for further discussions in the FCL Helicopter SubCommittee.

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12.33	Eurocopter – France	Propose different text, See below	Proficiency checks judge the pilot's ability in handling, airmanship and other general flying skills. The imposition of type specific checks would be significant and unnecessary burden on both private and commercial pilots, for no significant safety gain. Single engine types are simple, and the annual hours flown requirement is quite sufficient to maintain type related proficiency.	Noted, not part of this NPA. Commentors may provide a Working Paper to be provided for further discussions in the FCL Helicopter SubCommittee.
<p>Proposed text :</p> <ol style="list-style-type: none"> 1. Add a new paragraph 2.245(b)(4): For single engine turbine helicopters, as listed in Appendix 1 to JAR-FCL 2.245(b)(4) (same wording as (b)(3)) 2. Create Appendix 1 to JAR-FCL 2.245(b)(4), Similar to appendix 1 to JAR-FCL 2.245(b)(3) but with list of single engine turbine helicopters as given in Appendix 1 to JAR-FCL 2.220 but limited to FAR/JAR 27 helicopters (CAR ?). <p>Modify paragraph 2.245(c) by adding reference to Appendix 1 to JAR-FCL 2.245(b)(4).</p>				

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12.49	CAA – United Kingdom	General comment, see below	To clarify intent.	<p>Accepted.</p> <ul style="list-style-type: none"> - A separation line has been introduced in Appendix 1 to JAR-FCL 2.220 (Helicopter Type rating list) between SE Piston and SE Turbine helicopter of the Bell 47 types. Also a new licence endorsement for Bell 47T. - A separation line has been introduced in Appendix 1 to JAR-FCL 2.220 (Helicopter Type rating list) between SE Piston and SE Turbine helicopter of the UH12. Also a new licence endorsement for UH12T.
<p>JAR-FCL 2.245(b)(3) proposes modified type rating revalidation requirements for the single engine piston helicopters stipulated in Appendix 1 to JAR-FCL 2.245(b)(3). This appendix includes a reference under Bell Helicopters to a licence endorsement for the Bell 47 [note: Bell 47 - nothing else]. Reasonable in the context of what is proposed.</p> <p>But, the actual licence endorsement [from the proposed Appendix 1 to JAR-FCL 2.220] for Bell Helicopter Bell 47s is Bell 47/47T covering as it does a couple of turbine engine conversions as well.</p> <p>There is an inconsistency here. If it is the intention that the modified type rating revalidation requirements should apply only to certain single engine piston helicopter types, then surely the Bell 47T should to be treated as an entirely separate type rating. JAR-FCL does not provide for the revalidation of only part of a type rating.</p>				

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JAR-FCL 2.300

12.47	CAA UK	Beneath title add (see appendix 1 to JAR-FCL 2.300)'. '.	Editorial	Accepted, editorial.
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Appendix 1 to JAR-FCL 2.300

12.31	FOCA – Switzerland	The NPA text at page 74 of NPA-FCL 12, paragraph 2 (b), add text : <i>(iv) no instruction within a JAA Member State</i>	Same restrictions as for FI ! (see paragraph 1 (b) (ii))	Accepted, for consistency and could also be applicable to JAR-FCL 1
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JAR-FCL 2.315(b)

12.50	CAA – United Kingdom	NPA-FCL 8 has already introduced a new paragraph (b). Paragraph numbering needs adjusting.	Editorial	Accepted, editorial
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AMC FCL 2.340

12.51	CAA – United Kingdom	Propose different text, see below	Clarification of intent	<p>Partly accepted.</p> <ul style="list-style-type: none"> - Insert in LONG BRIEFING AND AIR EXERCISES, exercise 28 text to read: 28 Night flying (if night instructional qualification required). - Insert in the heading of Exercise 28 – NIGHT FLYING (if night instructional qualification required). - Amend JAR-FCL 2.325(b)(2) and JAR-FCL 2.330(c) to read : Night flying instruction, provided a helicopter night qualification is held.
<p>The proposed amendment to AMC FCL 2.340 introduces modifications to the FI(H) course to cover the training of instructors to give night flying instruction. Against Air Exercise 28 Night Flying of the air exercises of the FI(H) course in brackets is ‘...(if night qualification required)...’.</p> <p>It is understood that this signifies that the night element of the instructor course is not mandatory. Instructors need only qualify to give night flying instruction if they want to.</p> <p>If so, the AMC is not the right place to identify an optional requirement. Logically, JAR-FCL 2.325(b)(2) and JAR-FCL 2.330(c) should be modified by adding something like:</p> <p>‘) night flying instruction provided a night qualification is held and providing the instructor has completed as a student the night flying instruction elements of the FI(H) course (see JAR-FCL 2.340 and AMC FCL 2.340).’.</p> <p>The first part of the proposed text (namely, ‘...provided a night qualification is held...’) has already been considered as an editorial amendment. It remain to decide if the rest can be considered as an editorial change or will require to be included in a future NPA.</p>				

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AMC FCL 2.470 (a), (b) and (c)

12.5	CAA – Czech Republic	Propose different text : 040 02 01 02 - rapid decompression - entrapped gases - barotrauma - counter measures - hypoxia - symptoms - time of useful consciousness - counter measures	Original arrangement is confusing; brings together two different states and physiological processes.	Noted, to be discussed in the FCL Examinations SubCommittee.
12.6	CAA – Czech Republic	Delete part 040 02 01 03	Helicopter pilots do not operate in high altitude environment.	Noted, to be discussed in the FCL Examinations SubCommittee.
12.7	CAA – Czech Republic	Delete 050 09 07 00 for helicopters	Helicopters pilots are not supposed to operate in stratospheric conditions	Noted, recommended to be included in the bridge examination to be discussed in the FCL Examinations SubCommittee.
12.8	CAA – Czech Republic	Propose different text 050 10 03 01 Aeronautical meteorological codes : METAR and SPECI, including runway state information group, TAF	1) Information SIGMET is not a code, see Annex 3, Chapter 7 2) SNOWTAM is not a MET subject. 3) As for “runway report”, proper terminology should be used, i.e. runway state information.	Noted, to be discussed in the FCL Examinations SubCommittee.

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12.9	CAA – Czech Republic	Propose different text 050 10 03 06 SIGMET and AIRMET information, aerodrome warnings, wind shear warnings	Self-explanatory, see also Annex 3, Chapter 7.	Noted, and recommended for reconsideration by the FCL Examinations SubCommittee.
12.10	CAA – Czech Republic	Propose to delete paragraph 062 06 04 00 Decca navigation system	We propose to delete Decca navigation system from syllabus and replace to Type Rating, Qualifications requirements at types where Decca is used (if any).	Noted, recommended to reconsideration by the FCL Examinations SubCommittee and FCL Committee.
12.32	FOCA –Switzerland	The NPA text from page 108 to page 199 of NPA-FCL 12 <i>Entire new revision and development of the syllabus for ATPL(H), CPL(H) and IR(H)</i>	The current version of this syllabus shows so many contradictory items and missing topics, that a change of the philosophy (CPL(H) plus IR(H) = ATPL(H)) seems to be necessary. FOCA will submit a corresponding Working Paper.	Noted.

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12.39	CAA – United Kingdom	<p>It is understandable that the syllabii for the theoretical examinations should be combined since most of the knowledge required is common. However there are inconsistencies; for example, subject :</p> <p>a. 010 01 01 03 Why do helicopter CPL candidates need this yet aeroplane CPL candidates not need to know this.</p> <p>b. 022 01 01 02 Why do helicopter CPL candidates not need to know this.</p> <p>c. 062 01 05 00 Why do CPL candidates not need to understand this subject. These are only some of the inconsistencies ; there are others.</p>	The theoretical examination requirements should be consistent across all subjects.	<p>a. Noted, recommended to reconsideration by the FCL Examinations SubCommittee.</p> <p>b. Recommendation to FCL Examinations SubCommittee to include X to the CPL(H) syllabus.</p> <p>c. Rejected, ILS is not applicable to VFR licences.</p>