

Comment/Response Document NPA-FCL-8

Comment number	Commentator	Comment	Response
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General

8.001	LFV-Sweden	There is no time for the proposals to be incorporated in JAR-FCL in advance of the respective implementation dates. A more realistic date would be that the proposals be incorporated by 1 January 2000.	Not accepted. (NPA-FCL 7, com. 7.001)
8.006	MOT-Austria	Agree	Noted.
8.007	CAA-Czech Rep.	Agree with NPA-FCL 8	Noted.

JAR-FCL 2.026

8.010	IFALPA	<p>1. Replace “...a flight simulator of the helicopter type to be used...” with “...a Level D flight simulator of the helicopter type to be used...” in paragraph (a) and (b).</p> <p>2. Replace “ A co-pilot shall not serve ...” with “ A co-pilot shall not operate as a pilot..” and “ ...served as a pilot at the controls...” with “ ...operated as a pilot at the controls....”</p> <p>3. Replace the entire text in paragraph (a) with “ A co-pilot shall not operate as co-pilot a helicopter carrying passengers unless he has carried out at least three take-offs and three landings as pilot flying in a helicopter of the same type or a Level D flight simulator of the helicopter type to be used, in the preceding 90 days”.</p>	<p>1. Rejected</p> <p>2. Accepted, see amendment of paragraph (b) below.</p> <p>3. Rejected</p> <p>(NPA-FCL 7, com. 7.080)</p>
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Amendment of JAR-FCL 2.026 :

JAR-FCL 2.026 Recent experience **for pilots not operating in accordance with JAR-OPS 3**

(a) A pilot shall not operate **a helicopter** as pilot-in-command of a helicopter carrying passengers unless that pilot has made three circuits, each to include take-offs and landings, as pilot flying in a helicopter of the same type or a flight simulator of the helicopter type to be used, in the preceding 90 days; and

(b) A co-pilot shall not ~~serve~~ **operate** as pilot at the ~~flying~~ **flight** controls of a helicopter carrying passengers during take-off and landing unless that pilot has ~~served~~ **operated** as pilot flying during take-off and landing in a helicopter of the same type or a flight simulator, of the helicopter type to be used, in the preceding 90 days.

(c) Text unchanged, as in NPA-FCL 8

8.019	CAA-UK	Paragraph (a), third line, from " <i>...as pilot flying in an helicopter..</i> " delete " <i>..in...</i> "	Covered by text change as above. (NPA-FCL 7, com. 7.019)
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JAR-FCL 2.040

8.020	LFV-Sweden	<p>1. For JAR-FCL 2.040(a) replace NPA text with : <i>".. Student pilots and licence holders shall not act as pilot in any pilot operating capacity at any time when they are aware of any decrease in their medical fitness which might render them unable to perform in such capacity..."</i></p> <p>2. In JAR-FCL 2.040(b) delete "<i>...Holders of medical certificates..</i>" and substitute "<i>... Student pilots and licence holders..</i>".</p>	<p>1. Rejected, a medical certificate is not required before the first solo flight.</p> <p>2. Rejected, see above.</p> <p>(NPA-FCL 7, com. 7.074)</p>
8.002	CAA-UK	Paragraph (b), line 3 amend to read " <i>..or receive any other treatment..</i> "	Accepted, in line 3 replace "use" with "undergo". (NPA-FCL 7, com. 7.005)

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JAR-FCL 2.050

8.003	LFV-Sweden	50% of the co-pilots flying time is a requirement in ICAO Annex 1	<p>Rejected, outdated ICAO - Co-pilot has captain experience today.</p> <p>However, for clarification the FCL Committee agreed to recommend an amendment of the definition of Co-pilot in JAR 1, to read the same as in JAR-FCL 2.080 (c)(2). The actual definition is not clear enough. See below.</p> <p>(NPA-FCL 7, com. 7.006)</p>
<p>Recommendation for the amendment of the definition of Co-pilot in JAR 1 :</p> <p>The holder of a pilot licence occupying a pilot seat as co-pilot on a helicopter on which more than one pilot is required under the type certification of the helicopter, or the regulations under which the flight is conducted.</p>			

Appendix 1 to JAR-FCL 2.055

8.004	LFV-Sweden	<p>What kind of authorisation does the FTD and FNPT I - instructor get ?</p> <p>It needs clarification.</p>	<p>It is sufficient for them to be named in the FTO approval.</p> <p>(NPA-FCL 7, com. 7.007)</p>
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Appendix 2 to JAR-FCL 2.055

8.016	CAA-UK	<p>Renumber paragraphs 26 and 27, to read 25 and 26.</p>	<p>Rejected, covered by a previous editorial change</p>
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Appendix 1 to JAR-FCL 2.075

8.011	IFALPA	Instructions for Section XIV, the use of date in the form should be , e.g. 23 Jan 1953.	Rejected, FCL/C agreed that the standardised method for writing the date should be the European system : day, month, year (al in numerals) (NPA-FCL 7, com. 7.081)
8.017	CAA-UK	Table on page 3 part xii, delete "aeroplanes" insert "helicopters".	Rejected, covered by an previous editorial change

JAR-FCL 2.175

8.012	IFALPA	This paragraph conflicts with the rule contained in JAR-OPS 3.940(b) which requires that for flight under IFR the pilot shall have a valid instrument rating.	Rejected, the FCL Committee decided the new wording should stay (NPA-FCL 7, com. 7.082)
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Appendix 1 to JAR-FCL 2.205

8.018	CAA-UK	paragraph 12 (b), delete reference to "including circling".	Rejected, the manoeuvre is part of the basic IR course. Circling approach is not mandatory in the initial IR skill test.
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Appendix 1 to JAR-FCL 2.240 & 2.295

8.013	CAA-Denmark	Add after "under IFR", "if applicable"	Accepted.
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AMC FCL 2.425

8.015	Alan Mann Helicopters	Paragraph 9, 1. line 2, add "relating" after two test/checks. 2. line 3, add "to" before type /rating	1. Accepted 2. Editorial
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