

JAA LICENSING SECTORIAL TEAM



*** Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Version : After LST review of consultation comments

JAA Sectorial Team on Licensing Requirements, JAR-FCL

Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

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General

002	Ms. Marta Koisová, CAA of the Slovak Republic	No comments .	Support for adoption.	Noted
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**JAR-FCL 1 (Aeroplane)
Section 1
Subpart A – General Requirements**

JAR-FCL 1.015

021	Mr. D. L. Conduit, UK CAA	See text below	Editorial consistency.	Accepted.
<p>A change is also proposed to JAR-FCL 2.015[b][4] to achieve the same result BUT with slightly different text. It is recommended that the proposed text from JAR-FCL 2 is adopted and adapted for JAR-FCL 1 as follows: “[4] In circumstances where validation of a non-JAA licensed pilot is requested to fulfil specific tasks of finite duration in accordance with Appendix 3 to JAR-FCL 1.015, an NAA may validate such a licence for those tasks without the holder meeting the requirements of Appendix 1 to JAR-FCL 1.015.</p>				
100	Mr. Louis Hucher, Dassault Aviation	None.	See text below.	Noted.
<p>JAR-FCL 1.015(b)(4) and Appendix 3 to JAR-FCL 1.015 authorize, subject to some conditions, a pilot holding a non-JAA license and type rating to fly as instructor, examiner or pilot in command of flights related to the introduction, demonstration or testing of aeroplanes registered in a JAA Member State. Dassault Aviation supports this text.</p>				

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JAR-FCL 1.050

022	Mr. D. L. Conduit, UK CAA	JAR-FCL 1.050[b][5] "The holder of a valid CPL[A]/[H] is credited with the theoretical knowledge requirement in subject Human Performance for the IR[A]." JAR-FCL 1.050[b][6] "The holder of a valid IR[A]/[H] is credited with the theoretical knowledge requirement in subject Human Performance for a CPL[A]."	The justification makes it clear that the credit should be established on the basis that the student applying for the credit should hold a valid JAR-FCL CPL or IR. So say so in the requirement.	Accepted, but text changed as follows : (5) An applicant having passed the theoretical knowledge examination in subject Human Performance for a CPL(A)/(H) is credited with the theoretical knowledge requirement in subject Human Performance for an IR(A) according to the pass standards set out in JAR-FCL 1.490. (6) An applicant having passed the theoretical knowledge examination in subject Human Performance for an IR(A)/(H) is credited with the theoretical knowledge requirement in subject Human Performance for a CPL(A) according to the pass standards set out in JAR-FCL 1.490.
023	Mr. D. L. Conduit, UK CAA	See text below.	Editorial consistency and for the avoidance of doubt.	Accepted, align text in JAR-FCL. Change item to " Human Perfomance" and delete "limitations"
<p>The theoretical knowledge subject dealt with in these proposed amendments is referred to as "Human Performance". Elsewhere in JAR-FCL, the subject is referred to as "Human Performance & Limitations". Two different subject titles should not be used for the same subject.</p> <p>Annex 1 to the Convention on International Civil Aviation uses "Human Performance" as the subject title and it is recommended that this title be adopted in JAR-FCL.</p>				

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063	Mr. Michel Bedrine, DGAC France	<p>(5) An applicant having passed the theoretical knowledge examination in subject Human Performance for a CPL(A)/(H) is credited with the theoretical knowledge requirement in subject Human Performance for an IR(A)</p> <p>(6) An applicant having passed the theoretical knowledge examination in subject Human Performance for an IR(A)/(H) is credited with the theoretical knowledge requirement in subject Human Performance for a CPL(A)</p>	<p>Those both paragraphs do not take in account the rules for crediting! The theoretical examinations have to be passed within 18 months. What will be the rule if the applicant does not awarded a pass in all of the required subjects within the 18 months period, and if he has started during the 18 months period another set of examination for another licence or for IR where crediting could be granted?</p>	<p>Accepted, but text changed as follows :</p> <p>(5) An applicant having passed the theoretical knowledge examination in subject Human Performance for a CPL(A)/(H) is credited with the theoretical knowledge requirement in subject Human Performance for an IR(A) according to the pass standards set out in JAR-FCL 1.490.</p> <p>(6) An applicant having passed the theoretical knowledge examination in subject Human Performance for an IR(A)/(H) is credited with the theoretical knowledge requirement in subject Human Performance for a CPL(A) according to the pass standards set out in JAR-FCL 1.490.</p>

Appendix 3 to JAR-FCL 1.015

015	Mr. M. Haerynck, BCAA	<p>pt(2) (a) Possess an appropriate licence, medical certificate, type rating, and qualifications, to include instructor <u>rating on type</u> or examiner <u>authorisation on type</u>, valid in the non-JAA State for the duties proposed, and</p>	<p>1) Use the words rating (for instructor) and authorisation (for examiner) instead of qualification. 2) To be clear that the instructor rating or examiner authorisation must be on the type used.</p>	<p>(1) and (2) Rejected, covered by the original text, i.e. "qualifications for the duties proposed."</p>
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024	Mr. D. L. Conduit, UK CAA	[Title before paragraph 1] Delete 'Temporary' and insert 'Temporary'.	Editorial.	Accepted.
064	Mr. Michel Bedrine, DGAC France	See text below.	Except for the duration of the validation, the content of the former paragraph 1 is an explanation, without regulatory character and will be in better place in the explanatory note.	Accepted, but with the following editorial change : <i>A pilot license issued in accordance with ICAO Annex 1 by a non-JAA State, including an instructor rating or examiner authorisation issued by that State may be validated or otherwise authorised subject to conditions, for a maximum of 1 year, by a JAA Member State in order to permit flights to demonstrate, operate, ferry or test an aeroplane registered in that JAA Member State.</i>
<p>1. <i>It is recognized that on occasion pilots holding licences and type ratings issued by a non-JAA States are required to fly as instructors, examiners or pilot in command of flights related to the introduction, demonstration or testing of aeroplanes registered in a JAA Member State. These occasions are normally of finite duration (one year or less) and typically are the result of a need to help safely introduce an aeroplane type or variant new to the operator, or satisfy a short term need to demonstrate, operate, ferry or test an aeroplane registered in a JAA Member State.</i></p> <p>1. 2- <i>A pilot license issued in accordance with ICAO Annex 1 by a non-JAA State, including an instructor rating or examiner authorisation issued by that State may be validated or otherwise authorised subject to conditions by a JAA Member State in order to permit flights in aeroplanes registered in that Member State for 1 year maximum, in order to demonstrate, operate, ferry or test an aeroplane registered in a JAA Member State . When validating a licence under the provisions of this Appendix, the non-JAA licence holder may be exempt from the requirements for validation of a non-JAA licence contained in Appendix 1 to JAR-FCL 1.015, subject to the following conditions:</i></p>				

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Appendix 1 to JAR-FCL 1.050

016	Mr. M. Haerynck, BCAA	Should it be possible to make an editorial change to §2 of this appendix so that it should read: 2. The holder of an ATPL(H) not restricted to VFR <u>or of a CPL(H) with the ATPL(H) theoretical knowledge credit</u> for the issue of a CPL(A) or an ATPL(A) and the holder <u>of an ATPL(H)</u> restricted to VFR or of a CPL(H) for the issue of a CPL(A).	a) CPL holder with ATPL credit are also foreseen in JAR-FCL 2. b) The words “ of an ATPL(H)” are missing. The text in JAR-FCL 1 is then in accordance with this of JAR-FCL 2.	Rejected, item not part of this NPA. Item will be part of future revision of JAR-FCL 2.
058	CAA Sweden	See text below	There is no reason for NOT examining Air Law and ATC Procedures. The topic differs in so many ways between aeroplane and helicopter and should be <u>mandatory</u> to test when bridging between (A) and (H).	Rejected, it is expected that both training syllabus cover (A) and (H) aspects.

Change the NPA proposal as follows:

~~{1. Holder of a helicopter licence for the issue of a PPL(A) (...) (see JAR FCL 1.130).~~

1. For the issue of a PPL(A), the holder of an helicopter licence shall pass PPL(A) theoretical knowledge examinations (from AMC-FCL 1.125 Syllabus of theoretical knowledge for the Private Pilot Licence (Aeroplane)) in the following topics:

Air Law and ATC Procedures; Aircraft General Knowledge; Flight Performance and Planning; Operational Procedures and Principles of Flight.

~~In addition, applicants shall pass a theoretical knowledge bridge examination in Air Law and ATC Procedures as determined by the Authority.~~

Appendix 1a to JAR-FCL 1.055

065	Mr. Michel Bedrine,	See text below.	In the WP JAA LST # 31 it is made	Rejected, covered in paragraph 19 of this
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	DGAC France		reference to the § 14 of the same appendix where one of the requirements for the HT is : " <i>The HT shall hold or have held in the three years prior to first appointment as a HT, a professional pilot licence</i> ". For this specific case where the HT and CGI position are combined, the minimum requirement to get "sound managerial capability" should be to get a pilot experience!	Appendix.
Referring to § 11. For modular training courses, these positions may be combined and filled by one or two persons, full time or part time, depending upon the scope of training offered. At least one person on the staff must be full time. At FTOs conducting theoretical knowledge instruction only, the positions of HT and CGI may be combined. The nominated person shall have a sound managerial capability, hold or have held a professional pilot licence related to the course to be conducted with ratings as appropriate , have an experience as pilot of aeroplane appropriate to the training course approved in the FTO , and shall meet the requirements set out in paragraph 19 below.				
066	Mr. Michel Bedrine, DGAC France	See text below.	This new category of instructor must be able to use simulation devices.	Accepted.
18 For flight training duties on a FTD and a FNPT I, instructors shall hold or have held 3 years prior to the first appointment, a professional pilot licence and rating(s), except for instructors having an authorisation according to item 3 and/or 4 of Appendix 1 to JAR-FCL 1.005, appropriate to the training courses they are appointed to conduct, and have had instructional training experience. For flight training duties on a flight simulator and/or FNPT II, instructors shall hold a FI(A), IRI(A), TRI(A) or CRI(A) rating or a SFI(A) or STI(A) or MCCI(A) authorisation relevant to the course the instructor is conducting.				
Appendix 1b to JAR-FCL 1.055				
017	Mr. M. Haerynck, BCAA	See text below.	§ c(1) is contradictory to § c(2).	Item withdrawn from this NPA, overall proposal is immature for further processing.
The new § c(2) is in contradiction with § c(1) which states that the skill test is to be taken in any JAA member State. § c(2) should read:				

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<p>(2) If the <u>training</u> for the instrument rating is taken outside JAA Member States, the FTO</p> <p>The last sentence of this paragraph should read: The <u>rating</u> shall be.....</p>				
025	Mr. D. L. Conduit, UK CAA	Change proposed sentence to: "The acclimatization flying shall consist of at least 10 hours dual instruction in multi engine aeroplanes flying in accordance with the Instrument Flight Rules [IFR] which shall not be part of the requirements according to Appendix 1 to JAR-FCL 1.160 & 1.165[a][1]."	<ol style="list-style-type: none"> 1. The acclimatization flying must be related to the justification for introducing it. That is introducing the student to the IFR flying in JAA Member States. 2. Since the requirement presupposes that the student needs such acclimatization flying, it must be conducted as dual instruction. 3. The flying should be completed in an aeroplane on an ATP[A] course. 	Item withdrawn from this NPA, overall proposal is immature for further processing.
026	Mr. D. L. Conduit, UK CAA	What if the student on the ATP[A] course is already the holder of a JAR-FCL IR[H]? It would seem reasonable to give the IR[H] holder relief from the requirement for IFR acclimatization flying aeroplanes.		Item withdrawn from this NPA, overall proposal is immature for further processing.
067	Mr. Michel Bedrine, DGAC France	<i>(2) If the skill test for the instrument rating is taken outside JAA Member States by Examiners of the approving Authority, the FTO shall make arrangements for the approved course to include acclimatisation flying in the</i>	This comments is just a clarification. During the LST # 10 discussion, the agreement for this flexibility has been approved, France does so also. But I think there is a misunderstanding from Lufthansa training !	Item withdrawn from this NPA, overall proposal is immature for further processing.

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		<p><i>airspace of a JAA Member State. The acclimatisation flying shall consist of at least 10 hrs multi-engine aircraft flying which shall not be part of the requirements according Appendix 1 to JAR-FCL 1.160 & 1.165(a)(1). The licence shall be issued after the completion of the entire training programme, including the acclimatisation flying.</i></p>	<p>This flexibility is only given for training partially training outside which means that this training is <u>"confined to all or part of the ATP integrated course"</u>. In that case the requirements for skill test (see appendix 1 to JAR-FCL 1.160 & 1.165(a)(1) § 14) are to conduct <u>"the instrument rating skill test on a multi-engine aeroplane in accordance with Appendix 1 and 2 to JAR-FCL 1.210"</u>.</p> <p>I have heard at the end of the meeting that Lufthansa training conduct this skill test on a single engine. In that case this not in agreement with the JAR-FCL requirements.</p>	

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**JAR-FCL 1 (Aeroplane)
Section 1
Subpart C – Private Pilot Licence (Aeroplane) – PPL(A)**

Appendix 1 to JAR-FCL 1.125

027	Mr. D. L. Conduit, UK CAA	Delete from paragraph 4: "navigation using radio aids [see exercise paragraph 3 above];"	See text below.	Rejected. The intention is for the PPL holder to be able to use radio navigation to assist his /her navigation. It does not assume that the flight will be conducted in IMC.
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As stated in paragraph 1 of this Appendix, the aim of the PPL[A] course is to train the student pilot to fly safely and efficiently under **Visual Flight Rules** [VFR]. Therefore, it is neither necessary nor prudent to introduce a student to 'navigating using radio aids' in a device that has no external visual references.

Teaching the use of radio aids during the PPL[A] course gives a student one of a number of complimentary techniques to use when going from place to place but does not [and should never] detract from the importance of keeping one's head out of the cockpit as much as possible while flying under VFR! Introducing the student to using radio aids in a situation that mimics flight under Instrument Flight Rules will not help the student develop appropriate scanning techniques for flight under VFR and could arguably mislead student pilots into believing they have instrument flying skills that they do not have.

Appendix 1 to JAR-FCL 1.130 & 1.135

028	Mr. B. Waddington, UK CAA	Either: a) Remove hours limit. b) Make 6 hours a minimum instead of a maximum. c) Change 'shall' to read 'should'.	Time limit of 6 hours for PPL Theoretical Knowledge examinations is a serious constraint on the ability to examine a reasonable cross-section of the syllabus.	(a) Accepted, text changed as follows : The total time shall not exceed 6 hours and There shall be a total of at least 120 questions. (b) Rejected. (c) Rejected.
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**JAR-FCL 1 (Aeroplane)
Section 1
Subpart E – Instrument Rating**

JAR-FCL 1.185

029	Mr. D. L. Conduit, UK CAA	Deleted paragraph d and 'new' paragraph [c] [previously [e]] Amended paragraph [d] as shown below should be re-inserted as paragraph [c]. "If the rating is to be renewed, the holder shall meet the requirements of JAR-FCL 1.246[?]." What was paragraph [e], now changed to [c] should become paragraph [d].	The amendments to this provision no longer provide for renewal requirements for ratings that have not been revalidated for a period of less than 7 years. JAR-FCL 1.246 does not include any IR renewal requirements but this appears to be an oversight since the equivalent proposed amendment to JAR-FCL 2 does!	Covered by response to comment 083.
018	Mr. M. Haerynck, BCAA	The requirement that in case of renewal of the IR(A) rating the candidate has to meet "any additional requirement as determined by the Authority" is gone (old § d). This requirement should be reintroduced. (See also comment to JAR-FCL 1.246).		Covered by response to comment 083.

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Appendix 1 to JAR-FCL 1.210

010	Mr. Jansen Dehning, LBA	<p>Clarification is necessary/required for IR-multi-pilot-operations restriction.</p> <p>If this restriction is a matter of safety, MCC requirements or comparable requirements (see OML/SPL restrictions) will obviously be necessary and both pilots have to inform each other before the flight on how to share tasks during the flight (check list, drills, call-outs, RT etc.).</p>	At least AMC/IEM required.	Noted.
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**JAR-FCL 1 (Aeroplane)
Section 1
Subpart F – Class and Type Rating (Aeroplane)**

JAR-FCL 1.245

009	Mr. Jansen / Dehning, LBA	See text below.		Noted, this is a national legislative problem.
<p>The draft NPA-FCL 1-19, (FCL 1.245 (g)) intends the revalidation of class/type and IR ratings by an Operator Proficiency Check in acc. with JAR.OPS 1. National regulations in acc. with JAR-OPS 1 of the Federal Republic of Germany do not require an authorisation of examiners for this purpose by the Civil Aviation Authority. On the contrary it only depends on the internal designation of the operator.</p> <p>In contrast to this FCL requires that examiners are designated and authorised by the German Civil Aviation Authority in accordance with FCL 1.030. This legal regulation was motivated by the legal liability of the Federal Republic for faults of its granted contractors.</p> <p>The scope of the issued draft, concerning revalidation requirements of JAR-FCL, is completely contrary to German aviation legislation system. If this provision was passed by the JAA there would be no control and limitation of persons being supplied with sovereign rights.</p> <p>Regarding these systematic and practical reasons the intended par. FCL 1.245 (g) cannot be implemented in German law. Therefore we emphatically ask for cancellation of this amendment.</p>				
031	Mr. D. L. Conduit, UK CAA	After ‘...from Appendix 2 or 3 to JAR-FCL 1.240 are fulfilled...’ insert ‘...in accordance with Appendix 1 to JAR-FCL 1.240...’ .	Alignment with equivalent proposed amendment to JAR-FCL 2.245.	Rejected, and NPA-FCL 2.20 text should be aligned with text of NPA-FCL1.19.
030	Mr. D. L. Conduit, UK CAA	The amended text should be removed and the deleted text re-instated.	These provisions relate to revalidation requirements for both the SEP class rating and the TMG class rating. This is abundantly clear from the other parts of the sub paragraph within which JAR-FCL	Rejected, text changed as follows : “...in a single engine piston aeroplane / TMG... ”

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			1.246[c][1][ii] is contained. The use of the term 'single engine piston aeroplane' will simply cause confusion because of its similarity to single engine piston class rating.	
068	Mr. Michel Bedrine, DGAC France	<p><i>(1) All single-engine piston aeroplane class ratings (land) and all touring motor glider's ratings - Revalidation.</i> For revalidation of single-pilot single-engine piston aeroplane (land) class ratings and/or touring motor glider class ratings the applicant shall:</p> <p>...../.....</p> <p>(ii) within 12 months preceding the expiry of the rating complete 12 hours flight time in a single engine piston aeroplane the relevant class including:</p>	<p>Those requirements are also for the revalidation of TMG rating. Which means that the new requirements exclude to revalidate by experience a pilot which is only rated on TMG. This new requirements does not match also with the JAR-FCL 1.245 (c) (1) (iii).</p> <p>We propose to reverse to the previous text.</p>	Covered by response to comment 030.

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JAR-FCL 1.246

019	Mr. M. Haerynck, BCAA	Where the title of JAR-FCL 1.246 indicate also the renewal of the IR rating no requirements are found. Only § a revalidation is reproduced. A § b renewal should be added. (See also NPA-FCL 2-20).		Covered by response to comment 083.
033	Mr. D. L. Conduit, UK CAA	Insert: “[b] Renewal [See also JAR-FCL 1.185[c]] [1] If an IR[A] has expired, the applicant shall: [I] meet any refresher training and any additional requirements as determined by the Authority; [II] complete the proficiency check in accordance with JAR-FCL 1.246[a][1] or [a][2]	There are no renewal requirements stated here for aeroplane IRs. On the assumption that this is an oversight [since renewal requirements for helicopter IRs are to be found in the equivalent proposed amendment to JAR-FCL 2], the text above is proposed for inclusion in JAR-FCL 1.	Covered by response to comment 083.
032	Mr. D. L. Conduit, UK CAA	In introductory text, delete ‘expired’ and insert ‘expiry’.	Editorial.	Accepted.
034	Mr. D L. Conduit, UK CAA	See box below.	Clarity of interpretation and application.	(1) Accepted, delete “multi engine” in the first sentence of paragraph (a) (1). (2) Accepted, Replace “should” by “shall” in second sentence of paragraph (a).

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The text is confusing.

Firstly, sub paragraph [a][1] states: “An applicant for the revalidation of an IR[A] when combined with a **multi engine class rating** or a type rating shall complete a proficiency check...”.

Why does this sub paragraph refer only to multi engine class rating? Single engine class piston [and TMG] class rating may be revalidated by proficiency checks and single engine turboprop class ratings must be revalidated by proficiency checks. There is no reason why pilots with these single engine class ratings should not be covered sub paragraph [a][1]. Simply delete ‘multi engine’.

Second, the introductory text states: “**Whenever** possible, revalidation of an IR[A] **should** be combined with the proficiency check for revalidation of a type or class rating.” The use of ‘whenever’ and ‘should’ gives a pilot flying **any** aeroplane of **any** class or type the option of combining or separating class/type rating proficiency checks and IR proficiency checks.

Sub paragraph [a][2] then explains for someone who does not combine the IR[A] revalidation with that for a class or type rating what he/she has to do by way of a separate IR[A] proficiency check. References are to Appendix 3 to JAR-FCL 1.240 – the **single** pilot skill test/proficiency check.

Following on from the option outlined in the introductory text, this paragraph implies that pilots flying multi pilot aeroplanes who elect to separate the type rating revalidation and IR[A] revalidation only have to complete elements of the single pilot IR[A] proficiency check. [The sub paragraph makes no distinction between single pilot and multi pilot aeroplanes]. This raises two questions: Is this intended and if it is, does the IR[A] proficiency check have to be carried out in the multi pilot aeroplane type?

JAR-FCL 1.250

020	Mr. M. Haerynck, BCAA	This text should be put in § 1.250(b) so that all exemptions are in the same paragraph. (See also my comment on JAR-FCL 2.250).		Accepted, editorial.
096	Mr. Kai Myllymäki, FFSA	1. in accordance with JAR-OPS 1 or equivalent national operational requirements 2. JAR/FAR 23 Commuter category multi-engine turbo-prop or turbo-jet single pilot aeroplanes	1. compliance with App 1 to JAR-FCL 1.005, table line (d) 2. Older turbo-prop aeroplanes are not certified according to proposed category	Rejected, covered by response to comment 056

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056	Mr. Arne Axelsson, Swedish CAA	<p><u>Delete:</u> "Applicants having an experience of at least 500 hours as a pilot in multi-pilot operation in accordance with JAR-OPS on single pilot-aeroplanes JAR/FAR 23 Commuter category, shall be considered to meet the requirement of MCC;</p> <p><u>New text:</u> "Applicants having an experience of at least 500 hours as a pilot in multi-pilot operation according to JAR-OPS on single pilot HAR/FAR 23 multi-engine aeroplanes, shall be considered to meet the requirement of MCC;</p>	Very few aeroplanes are certified according to JAR/FAR 23 Commuter category. Today, many JAA States give credit for experience on all multi-engine aeroplanes even if the aeroplanes are not certified in accordance with JAR/FAR 23 Commuter category.	<p>Accepted, with the following amendment to the text :</p> <p>"Applicants having an experience of at least 500 hours as a pilot in multi-pilot operation according to JAR-OPS on single pilot JAR/FAR 23 multi-engine aeroplanes, shall be considered to meet the requirement of MCC;</p>

Appendix 1 to JAR-FCL 1.220

010	Mr. D. L. Conduit, UK CAA	<p>Referring to List of Type of Aeroplane. Boeing 767-400ER entries.</p> <ol style="list-style-type: none"> In 'Notes', delete "(see JOEB recommendations) . In note 1, insert 'only' between 'valid' and 'from'. In 'Notes', insert third note as follows: <p>• A licence holder with only a</p>	<p>Clarity of interpretation and application.</p> <p>Section 1 of JAR-FCL contains requirements that must be met to obtain licences and ratings. Requirements for ratings must be stated clearly in Section 1 of JAR-FCL, so it is not appropriate to make references to recommendations in notes relating to requirements. The above changes clarify the training</p>	See response to comment 070.
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		B767-400ER type rating shall complete an appropriate type rating course for initial qualification for the B757/767 type rating and make application to the Authority for inclusion of the type rating in the licence.	and testing required by pilots with a B757/767 type rating who want to fly the B767-400ER and by pilots with a B767-400ER type rating who want to qualify for the B757/767 type rating.	
036	Mr. D. L. Conduit, UK CAA	See text below.	Clarity of interpretation and application. The above changes clarify the training and testing required by pilots with a Falcon 2000 type rating who want to fly the Falcon 2000EX and by pilots with a Falcon 2000EX type rating who want to qualify for the Falcon 2000 type rating.	See response to comment 071.
<p>Referring to List of Type of Aeroplane. Falcon 2000EX entries.</p> <p>1. In column 4 in the rating endorsement 'Falcon 200/2000EX', delete './2000EX'.</p> <p>2. Replace existing ③ with ④ and replace existing ⑤. [See comment about B767-400ER entries.]</p> <p>3. In the notes related to the Falcon 2000EX, insert third note as follows: '⑤ A licence holder with only a Falcon 2000EX type rating shall complete an appropriate type rating course for initial qualification for the Falcon 2000 type rating and make application to the Authority for inclusion of the type rating in the licence.'</p> <p>4. Against 'Falcon 2000EX' in column 4 of the table, add '⑤'.</p>				
069	Mr. Michel Bedrine, DGAC France	See box below.	There is a lot of inconsistency in the licence endorsement rule, as far as the new aircraft is a variant of another one, the endorsement must	Accepted, but agreed to delete family. A320

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			take in account this concept of family.	
	Airbus	A318-100 series A319-100 series A320-100 series -200 series A321-100 series -200 series	A318/319/320/321 A320 family	
070	Mr. Michel Bedrine, DGAC France	See box below.	This is the result of a consensus between the TRStG, "Mr Boeing", and the FCL/OPS management. The goal is to highlighted in a proper manner the fact that the variant evaluation has been done by the JOEB in one way only, and if somebody wants to make the training in the other way, the course has to be evaluated.	Accepted, but amended as follows : ① The differences training course is valid only from the B757/767 'classic' to the B767-400 ER for crew members previously qualified on the B757/767 'classic' variants . The 767 400 ER to B757/767 'classic' differences training must be evaluated by the JOEB or the full type rating training must be accomplished.
		B757-200 series -300 series	(D)	B757/767 or

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
	Boeing	B777-200 series -300 series	B777	
		<p>Notes (see JOEB recommendations)</p> <p>① - The differences training course is valid from the B757/767 to the B767-400ER</p> <p>② - For a complete initial qualification on the B767-400ER, the licence endorsement will be designated B767 400ER</p> <p>① The differences training course is valid from the B757/767 'classic' to the B767-400 ER for crew members previously qualified on the B757/767 'classic' variants . The 767 400 ER to B757/767 'classic' differences training must be evaluated by the JOEB or the full type rating training must be accomplished.</p>		
071	Mr. Michel Bedrine, DGAC France	See box below.	In accordance with the agreement for Boeing, this is a proposal agreed by Mr Dassault. The goal is to highlight in a proper manner the fact that the variant evaluation has been done by the JOEB in one way only, and if somebody wants to make the training in the other way, the course has to be evaluated.	Accepted, but amended as follows : ② The differences training course is valid only from the Falcon2000 to the Falcon 2000 EX for crew members previously qualified on the Falcon2000 . The Falcon 2000 EX to the Falcon 2000 differences training must be evaluated by the JOEB or the full type rating training must be accomplished.
		Falcon 2000	(D)	Falcon2000/2000EX

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		<p>② Falcon 2000EX</p> <p>③ The differences training course is only valid from the Falcon 2000 to the Falcon 2000EX.</p> <p>④ For a complete initial qualification on the Falcon 2000EX, the licence endorsement will be designated Falcon2000EX.</p> <p>② The differences training course is valid from the Falcon2000 to the Falcon 2000 EX for crew members previously qualified on the Falcon2000 . The Falcon 2000 EX to the Falcon 2000 differences training must be evaluated by the JOEB or the full type rating training must be accomplished.</p>		
061	Mr. Jim Draxler, Boeing Commercial Airplanes, USA	See text below.	<ul style="list-style-type: none"> - The FAA has never awarded a "one-way type rating." Type rating is assigned based on the T-Tested Differences Course (per FAA Advisory Circular 120-53). - Training in any variant results in a type rating endorsement valid for all variants. - An FAA or JAA evaluation of a new differences course is normally appropriate. - Boeing fully supports reverse T3 and T4 testing for the 767-400 to 757/767 "classic" when required, but that should not affect the current type rating determination. (See 	Accepted, see response to comment 070.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			attached table in the original document).	
1 Manufacturer	2 Aeroplanes	3	4 Licence endorsement	
Boeing	B757-200 series -300 series	(D)	<i>B757/767</i>	
<p>❶ The differences training course is valid from B757/767 – “classic” to the B767-400ER for crew members previously qualified on B757/b767 – “classic” variants. B767-400 to B757/767 – “classic” differences training must be evaluated by the JOEB or full transition training must be accomplished.</p>				
101	Mr. Louis Hucher, Dassault Aviation	See box below.	Appendix 1 to JAR-FCL 1.220 proposes an amendment list of JAA License Endorsement to indicate: - For Falcon 2000 to Falcon 2000EX difference training, a “Falcon 2000/2000EX” license endorsement applies to all variants, - For Falcon 2000EX transition training (without Falcon 2000 experience) the type rating endorsement is designated as “Falcon 2000EX” only. This determination disregards the	Covered by response to comment 071.

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			<p>JOEB and FSB findingsm including the fact that T2 (handling qualities) testing was passed successfully. JOEB and FSB conducted a joint evaluation according to JOEB Handbook and AC 120-53, and their findings are published in the corresponding JOEB and FSB Reports.</p> <p>Although JOEB and FSB have only assessed the difference course from Falcon 2000 to Falcon 2000EX (2 days training course), this should not affect the type rating designation. The evaluation of the difference training course in the other way, i.e. from Falcon 2000EX to Falcon 2000 type rating training course should be accomplished.</p>	
1	2	3	4	
Manufacturer	Aeroplanes		Licence endorsement	
Dassault	Falcon 2000 Falcon 2000EX ❶	(D)	Falcon 2000/2000EX	
<p>❶ <i>The differences training course is valid from the Falcon 2000 to the Falcon 2000EX for crew members previously qualified on the Falcon 2000. The Falcon 2000EX to the Falcon 2000 differences training must be evaluated by the JOEB or full transition training must be</i></p>				

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<i>accomplished.</i>				
102	Mr. Louis Hucher	See box below.	<p>The Falcon 2000EX EASy airplane has been Type Certified by EASA on 18-jun-04 and corresponding pilot initial type rating training course has been approved by the Falcon JOEB and is now posted on the JAA web site.</p> <p>We propose therefore to include this airplane in the Type Rating list. The license endorsement which was already proposed through Dassault Aviation letter ref DGT-DTF/NAV 291248 dated 24-feb-04 is "Falcon 2000EX EASy", so as to keep consistency with the Falcon 900EX EASy endorsement.</p> <p>Note: capital and small letters should be respected.</p>	Accepted, subject to final acceptance by the ALOEG.

1 Manufacturer	2 Aeroplanes	3	4 Licence endorsement
Dassault	Falcon 2000EX EASy		Falcon 2000EX EASy

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Appendix 1 to JAR-FCL 1.240 & 1.295

037	Mr. D. L. Conduit		Consistency in the application of JAR-FCL.	Noted, the JAAC has endorsed the JOEB process. Delete "Authority" and insert "JAA" in paragraphs 1 and 2, to provide clarification.
<p>The principle of giving credit for previous experience on similar aircraft types based on a JOEB recommendation is accepted but by stating '...and agreed by the Authority...' the text appears to leave the way open for different CAAs to give credits or not as the case may be. If this actually happens, the principle of harmonization will be undermined and companies and pilots will, understandably, hunt around for courses approved by the Member State that most readily gives credits.</p> <p>To ensure consistency, a mechanism should exist whereby recommendations made by the JOEB are considered by Member States [through the LST?] and either accepted for adoption by all or rejected.</p>				
057	Mr. Arne Axelsson, Swedish CAA	<u>Text to be added in the last sentence:</u> The applicant may choose either the left hand or the right hand seat for the test/check if all items in the test/check can be executed from the selected seat. An applicant for ATPL (A) shall carry out the test from the left hand seat.	It's not possible to carry out all items from the right hand seat in many aeroplanes. Therefore, the test/check will not cover some items in the appendix. The ATPL test should be performed from the left hand seat so all items can be tested.	Accepted, but with the following amendment to last sentence of paragraph 10 : The applicant may choose either the left hand or the right hand seat for the test/check if all items in the test/check can be executed from the selected seat.
103	Mr. Louis Hucher, Dassault Aviation	None.		Noted.
<p>When recommended by a JOEB and agreed by the Authority, Appendix 1 to JAR-FCL 1.240 & 295 allows to give a pilot some credit for experience on similar types during two type rating courses (syllabus), as well as for some items of the skill test.</p> <p>Dassault Aviation supports this text, which should facilitate the Cross Crew Qualification concept.</p>				

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Appendix 1 to JAR-FCL 1.246

038	Mr. D. L. Conduit, UK CAA	See text below.	For the avoidance of doubt.	Accepted, text changed as follows : <i>"Credits shall be granted only when the holder is revalidating IR privileges for single engine and single pilot multi engine aeroplanes as appropriate."</i>
<p>To term 'unrestricted IR' in the note at the top of the matrix – "Credits shall be granted only to the holder of an unrestricted IR." – is not found elsewhere in JAR-FCL. Nowhere is 'unrestricted IR' properly explained or defined. If it is intended to distinguish between IRs with and without a multi pilot restriction [see JAR-FCL 1.180[a][1], then say so.</p> <p>Also the credits are only available to holders of valid IRs seeking to revalidate IR privileges so this should also be made clear.</p> <p>Accordingly amended text is proposed as follows: <i>"Credits shall be granted only when the holder is revalidating IR privileges for single engine and single pilot multi engine aeroplanes as appropriate."</i></p>				
039	Mr. D. L. Conduit, UK CAA	Referring to asterisked note at bottom of table: For existing text, substitute the following: <i>* Provided within the previous 12 months at least 6 IFR departures and approaches from a controlled aerodrome have been performed on a SP class or type or aeroplane in a single pilot operation.'</i>	3 departures and approaches is too few to maintain proficiency in single pilot operation. Use of a controlled aerodrome ensures that the departures and arrival actually take place from/to an aerodrome where ATC directs departures and arrivals.	Rejected.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
083	Mr. Michel Bedrine	See text below.	<p>(a)(1) - "revalidation and renewal" just clarification - there is a need to put regulation on the end of validity of the IR associated with the Type/class rating</p> <p>(c) This paragraph has been forgotten in the NPA !</p>	<p>Accepted, see also response to comment 034</p> <p>Text should read :</p> <p>(1) An applicant for the revalidation of an IR (A) when combined with a multi-engine class rating or a type rating revalidation or renewal shall complete a proficiency check in accordance with Appendix 1 and 2 to JAR-FCL 1.240 & 1.295 or Appendix 1 and 3 to JAR-FCL 1.240. In this case the instrument rating will be valid for the same period as the class or type rating, except in the case of a single-engine aeroplane class rating revalidation where the validity period of the instrument rating will be 12 months.</p> <p>(b) Renewal</p> <p>(1) If an Instrument Rating, has expired, the applicant shall</p> <p style="padding-left: 40px;">(i) meet refresher training and additional</p>

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
				<p align="right"> <i>requirements as determined by the Authority, and</i> (ii) <i>complete section 3b of Appendix 3 to JAR-FCL 1.240 including the flight preparation as a skill test.</i> <i>The rating will be valid from the date of completion of the renewal requirements.</i> </p>
<p><i>(a) Revalidation</i></p> <p><i>An IR(A) shall be revalidated within the three months immediately preceding the expired date of the rating. Whenever possible, revalidation of an IR(A) should be combined with the proficiency check for revalidation of a type or class rating.</i></p> <p><i>(1) An applicant for the revalidation of an IR (A) when combined with a multi-engine class rating or a type rating revalidation or renewal shall complete a proficiency check in accordance with Appendix 1 and 2 to JAR-FCL 1.240 & 1.295 or Appendix 3 to JAR-FCL 1.240. In this case the IR rating will be valid for the same period as the ME class or type rating.</i></p> <p><i>(b) Renewal</i></p> <p><i>(2) If an Instrument Rating, has expired, the applicant shall</i></p> <p><i>(i) meet any refresher training and any additional requirements as determined by the Authority, and</i></p>				

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<p>(ii) complete section 3b of Appendix 3 to JAR-FCL 1.240 including the flight preparation as a skill test. The rating will be valid from the date of completion of the renewal requirements.</p>				
084	Mr. Michel Bedrine, DGAC France	<p>Credits shall be granted only to the holder of an unrestricted IR. See box below.</p>	<p>2)(d) Basically the handling of a turbine aeroplane is easier to manage than a piston one. As far as the asymmetric handling of the turbine aeroplane has been checked in VFR in SP environment and that the pilot is current on SP MEP IR, there is no need to check again the handling in IFR</p> <p>(2)(e) the currency in SP environment is obtain by the 3 FR departures and approaches in the last 12 months.</p>	Accepted.
<p>When a proficiency check including IR is performed, and the holder has a valid:</p>		<p>Credit is valid towards the IR part in a proficiency check for:</p>		
(1)		(2)		
MP type rating		<p>a. SE class * and b. SE type rating *, and c. SP ME class and type rating, only credits for Section 3b of Appendix 3 to JAR-FCL 1.240</p>	(a)	
SP ME type rating, operated as single pilot		<p>a. SP ME class , and b. SE class and type rating</p>	(b)	
SP ME type rating, restricted to MP operation		<p>a. SP ME class * , and b. SE class and type rating *</p>	(c)	

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<i>SP ME class rating, operated as single pilot</i>		<i>a. SE class and type rating, and b. SP ME type rating, only credits for Section 3b of Appendix 3 to JAR-FCL 1.240</i>	<i>(d)</i>	
<i>SP ME class rating, restricted to MP operation</i>		<i>a. SE class and type rating * , and b. SP ME type rating * , only credits for Section 3b of Appendix 3 to JAR-FCL 1.240</i>	<i>(e)</i>	
<i>SP SE class rating</i>		<i>SE class and type rating</i>	<i>(f)</i>	
<i>SP SE type rating</i>		<i>SE class and type rating</i>	<i>(g)</i>	
<i>* Provided within the previous 12 months at least 3 IFR departures and approaches have been performed on a SP class or type of aeroplane in a single pilot operation.</i>				

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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**JAR-FCL 1 (Aeroplane)
Section 1
Subpart H – Instructor Ratings**

JAR-FCL 1.310

073	Mr. Michel Bedrine, DGAC France	<p>(a) <i>Pre-requisites.</i> All instructors shall :</p> <p>(i) hold at least the licence, rating and qualification for which instruction is being given, and</p> <p>(ii) have at least 15 hours experience as pilot on the type or class of aeroplane on which instruction is being given (unless specified otherwise), and</p> <p>(iii) shall be entitled to act as pilot-in-command of the aircraft during such training.</p> <p>The 15 hours relevant experience requirement shall be considered to have been met if a skill test in accordance with Appendix 1 and 2 to JAR-FCL 1.330 & 1.345 has been passed on that type or class.</p>	<p>It is not appropriate to propose that 15 hours of <u>flight experience</u> could be substituted by a skill test which has nothing to do with the capability to fly an aeroplane.</p> <p>The skill test in accordance with Appendix 1 and 2 to JAR-FCL 1.330 & 1.345 is to check the capability to an instructor to give instruction.</p> <p>This comments is also available for the helicopter side.</p>	Accepted.
040	Mr. D. L. Conduit, UK	After '[i] hold at least the licence,	The wording as proposed in the NPA	Accepted, but not as proposed.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
	CAA	rating and qualification for which instruction is being given...' insert '[unless specified otherwise]'. 	will require all SFIs and STIs to have a current Licence and Type Rating on the type on which they conduct training. This will negate the requirements of JAR-FCL 1.410[a][1], [a][2] and [b][1] and the proposed JAR-FCL requirements of JAR-FCL 1.420[a]. The above changes will ensure proper separation between requirements for licence holders with instructor ratings and others with synthetic instructor authorizations.	
060	Mr. Leen van der Spek, EAAPS	(a) All instructors, except STI(A), shall:	For all instructors 15 hours experience is required except for the new STI(A) in JAR-FCL 1.420. If 1.310 is not amended then there is a discrepancy in the regulation.	Rejected, it is covered response to comment 040.
098	Mr. Kai Myllymäki, FFSA	Delete from 1.330(a): ... and class and type ratings for single-engine aeroplanes, provided that for type ratings the FI(A) has completed not less than 15 hours on the relevant type in the preceding 12 months	1.310(a)(ii) covers the requirement for restricted FI(A) 1.325(b)(1), unrestricted FI(A) shall not have recent experience requirement. Both of them shall have initial experience on type or class.	Accepted, to be consistent with JAR-FCL 1.310.
041	Mr. D. L. Conduit, UK	Change paragraph [c] to correspond	What applies to helicopters here	Accepted.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
	CAA	to the equivalent text proposed for JAR-FCL 2.	should apply also to aeroplanes. [There is no actual change proposed to JAR-FCL 1, only to JAR-FCL 2 but the crediting of flight time as an examiner during skill tests / proficiency checks towards the revalidation requirements for instructor ratings should either apply to both helicopters and aeroplanes or to neither].	

JAR-FCL 1.335

074	Mr. Michel Bedrine, DGAC France	<i>Amendment to paragraph (a)</i> Before being permitted to begin an approved course of training for a FI(A) rating an applicant shall have: (a) at least a CPL(A) or completed at least 200 hours of flight time of which at least 100 hours shall be as pilot-in-command if holding an ATPL(A) or CPL(A) or 150 hours as pilot-in-command if holding a PPL(A);	Even if the applicant has performed a CPL integrated course, it is important for a future instructor who will be responsible for the training (including not only technical skills but airmanship, decision making) and the safety of students to have a minimum background as pilot in command to improve his self confidence and to give him the minimum required maturity. In a large majority of activities, it is asked to a trainer applicant to have a good experience of the activity before beginning to instruct. If	Rejected.
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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			economic reasons in aviation lead to reduce such experience, a minimum must be maintained.	

JAR-FCL 1.350

075	Mr. Michel Bedrine, DGAC France	<p>An applicant for a FI(A) rating</p> <p>(a) who has complied with the conditions specified in JAR-FCL 1.310, 1.315 and 1.335 through 1.345,</p> <p><i>or</i></p> <p>(b) who has been issued a specific authorisation in accordance with Appendix 1 to JAR-FCL 1.300, complies with the requirements of JAR-FCL 1.355 and hold a JAR-FCL licence</p> <p>shall have fulfilled the requirements for the issue of a FI(A) rating, subject to the initial restrictions set out in JAR-FCL 1.325.</p>	<p>1) This change is proposed by the CJAA, this is in the continuation of the IPL conversion process and is clearly the conversion of an instructor rating.</p> <p>2) the requirements in Appendix 1 to JAR-FCL 1.300 are lower than for a pilot in a JAA state, that is to say that there are 2 ways to get an instructor rating.</p> <p>3) The purpose of the JAR-FCL is not to make regulation for conversion of other system.</p> <p>4) There are restrictions under Appendix 1 to JAR-FCL 1.300 (1) (b) which have not been evaluated through the IPL process after a conversion of a licence; This is clearly back door to grant an instructor rating.</p> <p>5) The General Director from the DGTREN of the EU commission has sent a letter to every 25 members</p>	Rejected, with objection from France.
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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			which for one thing stipulates that in the training outside area, is a matter of the EU competency, as well as, the bilateral for conversion.	
042	Mr. D. L. Conduit, UK CAA	The holder of a non JAR-FCL instructor rating who also holds a JAR-FCL licence and meets the requirements of Appendix 1 to JAR-FCL 1.300 should be entitled to a JAR-FCL FI[A] rating or TRI[A] rating/SFI [A] authorization as appropriate whether or not they are specifically authorized to function within a TRTO or FTO offering courses of training outside the JAA Member States.	<p>In the justification, it states that the holder of a non JAR-FCL instructor rating who also hold a JAR-FCL licence and have not gained a specific authorization in accordance with Appendix 1 to JAR-FCL 1.300 will be required to meet the full training and testing requirement for the initial issue of the relevant instructor rating or authorization. There is no safety reason to justify this.</p> <p>Once the holder of a non JAR-FCL instructor rating has qualified for an authorization under Appendix 1 to JAR-FCL 1.300, he/she will have demonstrated compliance with JAR-FCL requirements and will then function as a JAR-FCL instructor in accordance with JAR-FCL. Therefore the requirements in Appendix 1 to JAR-FACL 1.300 amount to de facto conversion requirements for instructor qualifications. It does not</p>	Noted, but Working Paper required to introduce the change proposed to JAR-FCL.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			matter whether the holder of a non JAR-FCL instructor rating first functions as a HAR-FCL instructor in a TRTO or FTO overseas because once the JAR-FCL instructor rating/authorization is issued, the instructor can only use it in accordance with JAR-FCL.	

JAR-FCL 1.365

076	Mr. Michel Bedrine, DGAC France	See text below.	<p>1) This change is proposed by the CJAA, this is in the continuation of the IPL conversion process and is clearly the conversion of an instructor rating.</p> <p>2) the requirements in Appendix 1 to JAR-FCL 1.300 are lower than for a pilot in a JAA state, that is to say that there is 2 ways to get an instructor rating.</p> <p>3) The purpose of the JAR-FCL is not to make regulation for conversion of other system.</p> <p>4) There are restrictions under Appendix 1 to JAR-FCL 1.300 (2) (b) which have not been evaluated through the IPL process after a conversion of a licence; This is clearly back door to grant an</p>	Rejected, with the objection from France.
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			instructor rating. 5) The General Director from the DGTREN of the EU commission has sent a letter to every 25 members which for one thing stipulates that in the training outside area, is a matter of the EU competency, as well as, the bilateral for conversion.	
<p>(a) An applicant for the initial issue of a TRI(MPA) rating shall have:</p> <p>(a) (1) successfully completed an approved TRI course at an approved FTO or TRTO (see Appendix 1 to JAR-FCL 1.365 and AMC FCL 1.365);</p> <p>(2) completed at least 1500 hours flight time as a pilot of multi-pilot aeroplanes;</p> <p>(3) completed within the 12 months preceding the application at least 30 route sectors, to include take-offs and landings as pilot-in-command or co-pilot on the applicable aeroplane type, or a similar type as agreed by the Authority, of which not more than 15 sectors may be completed in a flight simulator; and</p> <p>(4) conducted on a complete type rating course at least 3 hours of flight instruction related to the duties of a TRI on the applicable type of aeroplane and/or flight simulator under the supervision and to the satisfaction of a TRI notified by the Authority for this purpose.</p> <p><i>The requirements above are fulfilled if the applicant hold a JAR-FCL licence, have been issued a specific authorisation in accordance with Appendix 1 to JAR-FCL 1.300 and complies with JAR-FCL 1.370.</i></p>				
043	Mr. D. L. Conduit, UK CAA	The holder of an non JAR-FCL instructor rating who also holds a JAR-FCL licence and meets the requirements of Appendix 1 to JAR-FCL 1.300 should be entitled to a JAR-FCL FI[A] rating or TRI[A] rating/SFI[A] authorization as appropriate whether or not they are	In the justification, it states that the holder of a non JAR-FCL instructor rating who also hold a JAR-FCL licence and have not gained a specific authorization in accordance with Appendix 1 to JAR-FCL 1.300 will be required to meet the full training and testing requirement for	Noted, but Working Paper required to amend JAR-FCL.

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		specifically authorized to function within a TRTO or FTO offering courses of training outside the JAA Member States.	<p>the initial issue of the relevant instructor rating or authorization. There is no safety reason to justify this.</p> <p>Once the holder of a non JAR-FCL instructor rating has qualified for an authorization under Appendix 1 to JAR-FCL 1.300, he/she will have demonstrated compliance with JAR-FCL requirements and will then function as a JAR-FCL instructor in accordance with JAR-FCL. Therefore the requirements in Appendix 1 to JAR-FACL 1.300 amount to de facto conversion requirements for instructor qualifications. It does not matter whether the holder of a non JAR-FCL instructor rating first functions as a HAR-FCL instructor in a TRTO or FTO overseas because once the JAR-FCL instructor rating/authorization is issued, the instructor can only use it in accordance with JAR-FCL.</p>	
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JAR-FCL 1.380

044	Mr. D. L. Conduit, UK	In both paragraphs, replace	The proposed additional	Accepted with revised text.
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
	CAA	<p>proposed amendments with:</p> <p>"[a][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane and have a valid type/class rating applicable to the aeroplane to be used on the ME CRI[SPA] course prior to commencing the course."</p> <p>"[b][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane and have a valid type/class rating applicable to the aeroplane to be used on the SE CRI{SPA} course prior to commencing the course."</p>	<p>requirements are unnecessary. A pilot who, before starting the course, is entitled to exercise the privileges of the applicable SP class or type rating and who has at least 30 hours experience on that class or type has demonstrated competence to commence the course.</p>	<p>Text should read:</p> <p>"[a][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane prior to commencing the course."</p> <p>"[b][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane prior to commencing the course."</p>
077	Mr. Michel Bedrine, DGAC France	See text below.	<p>We do not understand how the hours are required? It is said that the requirements are 30 hours as PIC including 15 hours as pilot..... of which 10 hours shall be PIC! What's about the remaining hours? If they are as PIC that means that details of those one are not appropriate.</p> <p>If they are not as PIC what's about the 30 hours requirement.</p>	<p>Accepted with revised text.</p> <p>Text should read:</p> <p>"[a][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane prior to commencing the course."</p> <p>"[b][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane prior to commencing the course."</p>

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<p>a) (2) completed at least 30 hours as PIC on the applicable type or class of aeroplane of which at least 10 hours shall be in the last 12 months, including 15 hours experience as pilot on the type/class of aeroplane in the last 12 months, of which 10 shall be PIC. The flight training hours on the ME CRI(SPA) course, and the skill test in accordance with Appendix 1 and 2 to JAR-FCL 1.330 & 1.345 may be credited towards these 15 hours.</p> <p>...../.....</p> <p>(b) (2) completed at least 30 hours as PIC on the applicable type or class of aeroplane of which at least 10 hours shall be in the last 12 months, including 15 hours experience as pilot on the type/class of aeroplane in the last 12 months, of which 10 hours shall be PIC. The flight training hours on the CRI(SEP) course, and the skill test in accordance with Appendix 1 and 2 to JAR-FCL 1.330 & 1.345 may be credited towards these 15 hours.</p>				
059	Mr. Leen van der Spek, EAAPS	<p>(a)(2) Completed at least 30 hours as PIC on the applicable type or class of aeroplane of which at least 10 hours shall be in the last 12 months.</p> <p>(b)(2) Completed at least 30 hours as PIC on the applicable type or class of aeroplane of which at least 10 hours shall be in the last 12 months.</p>	The proposed amendment is not necessary. 10 hours experience in the last year is enough. Nowhere on the schools of EAAPS appeared any problem with that.	<p>Accepted with revised text.</p> <p>Text should read:</p> <p>“[a][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane prior to commencing the course.”</p> <p>“[b][2] completed at least 30 hours as PIC on the applicable type or class of aeroplane prior to commencing the course.”</p>

JAR-FCL 1.385

045	Mr. D. L. Conduit, UK CAA	Replace proposed amendment with: “[1][ii] If the applicant has CRI[SPA]	As written a CRI who instructs on both SE and ME aeroplanes is not	(a) Accepted, with the following amendment to the proposed text :
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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		<p>privileges on both SE and ME aeroplanes, conduct at least [#] hours on SE aeroplanes and [#] hours on ME aeroplanes within the 10 hours of flight instruction required in the role of CRI[SPA] in accordance with JAFCL 1.385[a][1][i].”</p> <p>and add:</p> <p>“[b] If the rating has lapsed or if SE or ME aeroplane instructing privileges within the rating have lapsed, the applicant shall have within the 12 months preceding the application: ...”</p>	<p>actually required to have any recent instructing experience on ME aeroplanes. The requirement for 10 hours flight only on multi engine aeroplanes is not needed because the instructor must hold valid ME aeroplane class or type ratings anyway. The proposed text links validity of rating privileges to actual use of the rating. The actual number of hours to be completed in both SE and ME aeroplanes is to be decided by the LST [see # in above text].</p> <p>The adjustment to the renewal requirements will ensure that a pilot who has SE and ME CRI[SPA] privileges who stops instructing on either ME aeroplanes but continues instructing on SE aeroplanes or vice versa must be re-tested before using the lapsed privilege.</p>	<p>“[1][ii] If the applicant has CRI[SPA] privileges on both SE and ME aeroplanes, conduct at least 5 hours on SE aeroplanes and 5 hours on ME aeroplanes within the 10 hours of flight instruction required in the role, or.</p> <p>(b) Rejected, existing covers the case.</p>

JAR-FCL 1.410

078	Mr. Michel Bedrine, DGAC France	<p>(a) An applicant for a SFI(A) authorisation shall:</p> <p>(7) (i) have completed within a period of 12 months, preceding the</p>	<p>1) This change is proposed by the CJAA, this is in the continuation of the IPL conversion process and is clearly the conversion of an instruction rating.</p>	Rejected, with the objection of France.
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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		<p>application, at least three route sectors as an observer on the flight deck of the applicable type or similar type as agreed by the Authority, or</p> <p><i>(ii) have completed within a period of 12 months, preceding the application, at least 2 LOFT based simulator sessions conducted by qualified flight crew as an observer on the flight deck of the applicable type or similar type as agreed by the Authority. These simulator sessions shall include:</i></p> <p><i>(A) flight between 2 different airports of at least 2 hours duration each, and</i></p> <p><i>(B) associated pre-flight planning and de-briefing.</i></p> <p>The requirements above are fulfilled if the applicant have been issued a specific authorisation in accordance with Appendix 1 to JAR-FCL 1.300 and comply with the requirements of JAR-FCL 1.415.</p>	<p>2) The purpose of the JAR-FCL is not to make regulation for conversion of other system.</p> <p>3) There are restrictions under Appendix 1 to JAR-FCL 1.300 (2) (b) which have not been evaluated through the IPL process after a conversion of a licence; This is clearly back door to grant an instructor rating.</p> <p>4) The General Director from the DG-TREN of the EU commission has send a letter to every 25 members which for one thing stipulates that in the training outside area, is a matter of the EU competency, as well as, the bilateral for conversion.</p>	
046	Mr. D. L. Conduit, UK CAA	The holder of a non-JAR-FCL instructor rating who also holds a	See text below.	Noted, Working Paper is required.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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		JAR-FCL licence and meets the requirements of Appendix 1 to JAR-FCL 1.300 should be entitled to a JAR-FCL FI[A] rating or TRI[A] rating/SFI[A] authorization as appropriate whether or not they are specifically authorized to function within a TRTO or FTO offering courses of training outside the JAA Member States.		
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In the justification, it states that the holder of a non JAR-FCL instructor rating who also hold a JAR-FCL licence and have not gained a specific authorization in accordance with Appendix 1 to JAR-FCL 1.300 will be required to meet the full training and testing requirement for the initial issue of the relevant instructor rating or authorization.

There is no safety reason to justify this.

Once the holder of a non JAR-FCL instructor rating has qualified for an authorization under Appendix 1 to JAR-FCL 1.300, he/she will have demonstrated compliance with JAR-FCL requirements and will then function as a JAR-FCL instructor in accordance with JAR-FCL. Therefore the requirements in Appendix 1 to JAR-FACL 1.300 amount to de facto conversion requirements for instructor qualifications. It does not matter whether the holder of a non JAR-FCL instructor rating first functions as a HAR-FCL instructor in a TRTO or FTO overseas because once the JAR-FCL instructor rating/authorization is issued, the instructor can only use it in accordance with JAR-FCL.

JAR-FCL 1.419

008	Mr. Jansen Dehning, LBA	Amend JAR-FCL 1.419 by adding to headline: “(See JAR- FCL 1.420 (a))”	Classification on pre-instructional qualification <u>appropriate</u> to the courses.	Noted, this is our common understanding of the requirement.
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JAR-FCL 1.420 > Renumbered to JAR-FCL 1.419 paragraph (b).

007	Mr. Jansen Dehning,	The privileges of the holder of a STI	Specification/classification for	Noted, covered in response to comment
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
	LBA	(A) authorisation are to carry out synthetic flight instruction for initial grant of: (a) a licence, provided a FI (A) rating has been held (b) an instrument rating, provided a IRI-rating has been held (c) a class or type rating for single pilot aeroplanes, provided a CRI-rating has been held	proposed amendment: (a) Instructional qualification for initial licence issue PPL/ CPL requires FI qualification. (b) Logic consequence (c) Logic consequence Clarification on pre-instructional qualification appropriate to the courses.	008.
079	Mr. Michel Bedrine, DGAC France	<i>An applicant for a STI(A) authorisation shall: hold or have held within the previous 3 years a pilot licence containing an instructional qualification appropriate to the courses on which instruction is intended or a non-JAA licence acceptable to the Authority;</i>	In the administrative side, what is the intention behind ? Does that mean that the Authority has to manage the authorisation endorsement for each purpose?	Noted, and the answer is "yes".

Appendix 1 to JAR-FCL 1.300

072	Mr. Michel Bedrine, DGAC France	1 (a) Instructors seeking to instruct for a JAR-FCL licence including class and instrument ratings shall:	Back to previous wording. Since these instructors are not required to follow the required trainings as specified in JAR FCL 1.340 and 1.330, an experience as	Accepted, with the following amended text : (ii) have completed at least 500 hours of flight time as a pilot of aeroplanes, of
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		<p>(i) hold at least a CPL and ratings issued in accordance with ICAO Annex I required by the respective non JAA State for the instruction to be given on aircraft registered in that State;</p> <p>(ii) have completed at least 500 hours of flight time as a pilot of aeroplanes, of which at least 200 hours shall be as a flight instructor relevant to the intended training to be given and meet the experience requirements of JAR-FCL 1.330(a), (b), (c), (d) and/or (e);</p>	<p>instructor “relevant to the intended training to be given” has to be asked to compensate the absence or reduction of courses.</p>	<p>which at least 200 hours shall be as a flight instructor, including experience in the role of instruction to be given, and meet the experience requirements of JAR-FCL 1.330(a), (b), (c), (d) and/or (e);</p>
080	Mr. Michel Bedrine, DGAC France	<p>1 (a) Instructors seeking to instruct for a JAR-FCL licence including class and instrument ratings shall:</p> <p>(i) hold at least a CPL and ratings issued in accordance with ICAO Annex I required by the respective non JAA State for the instruction to be given on aircraft registered in that State;</p> <p>(ii) have completed at least 500 hours of flight time as a pilot of aeroplanes, of which at least 200 hours shall be as a flight instructor</p>	<p>The intention (according the WP JAA LST # 20 and discussion during the LST # 6) was to clarify whether the 200 hrs mentioned in paragraph (1)(a) mean 200 hrs as flight in each class or type rating.</p> <p>It is obvious that this requirements does not apply to the Class/type, but in my opinion it is related to the kind of instruction to be given; i.e : Basic training, Type rating training, IR training</p>	Duplicate of comment 072

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		<i>relevant to the intended training to be given</i> and meet the experience requirements of JAR-FCL 1.330(a), (b), (c), (d) and/or (e);	We propose to go back to the previous wording.	
097	Mr. Kai Myllymäki, FFSA	The principle of specific authorisation should be an equal base for FAA-JAA IPL or 1.016	See text below.	Rejected, Working Paper required.

An example: England has approved an FTO in USA. An FAA licence + FAA-flight instructor rating holder may give flight instruction in JAR-FTO for JAR-licence, when he/she is working in USA. The instructor had the course for specific authorisation. With the same licence and FI rating + specific authorisation he/she is not allowed to give instruction (with validated licence) in England. The given instruction in England might be under closer supervision. Summary: If the training for JAR-licence is conducted far from the Authority, it will be accepted. If it would be conducted close to issuing Authority, it would not be approved. It is not logical.

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**JAR-FCL 1 (Aeroplane)
Section 1
Subpart I - Examiners**

JAR-FCL 1.425

006	Mr. Jansen / Dehning, LBA	See text below.	Interconnection between 1.245(g) and examiner standards in Subpart I	Noted, agreed that JAR-FCL 2 will contain text of Appendix 1 to JAR-FCL 1.425.
<p>Inconsistent requirements FCL-1 and JAR-OPS 1 Equivalent to Appendix 1 to JAR-FCL 2.425 an Appendix 1 to JAR-FCL 1.425 should be introduced with the following Text: "Appendix 1 to JAR-FCL 1.425 Standardization arrangements for examiner See JAR-FCL 1.425, 1.4230 and 1.245(g) GENERAL 1. same text as App.1 to JAR-FCL 2.425 2. same text as App.1 to JAR- FCL 2.425"</p>				

JAR-FCL 1.455

047	Mr. D. L. Conduit, UK CAA	Replace proposed text at the end of the paragraph with: "and for the purposes of [a] above holds a valid type rating on the applicable aeroplane type . [see JAR-FCL 1.405].	1. It is not clear what "current flying practice" means whereas a valid type rating has clear requirements. 2. The test is not conducted "on the aeroplane" but in a simulator.	Accepted.
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
081	Mr. Michel Bedrine, DGAC France	<p>The privileges of an SFE(A) are to conduct type and instrument rating proficiency checks on multi-pilot aeroplanes in a flight simulator :</p> <p>(a) skill tests for the issue of type ratings for multi-pilot aeroplanes;</p> <p>(b) proficiency checks for revalidation or renewal of multi-pilot type and instrument ratings.</p> <p>provided that the examiner holds an ATPL(A), has completed not less than 1500 hours of flight time as a pilot of multi-pilot aeroplanes and is entitled to exercise the privileges of a SFI(A), and for the purpose of (a) above is in current flying practice on the aeroplane being used for the test. (see JAR-FCL 1.405).</p>	<p>We are not in agreement mainly for CRM reason to allow copilot to deliver initial issue of type rating for MPA. This regulation could be acceptable only to deliver a Type Rating to a copilot.</p> <p>In case of failure during any check, that could bring difficulties if for any reason the copilot examiner fly later with the captain he has failed.</p>	Rejected, the Authority may choose whether or not to issue.
099	Mr. Kai Myllymäki, FFSA	<p>is in current flying practice has at least 10 route sectors as pilot in preceding 12 months on the aeroplane...</p>	<p>Current flying experience is very indefinite determination and no harmonised interpretation would be used in JAA member states.</p>	Rejected, covered by response to comment 047.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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Appendix 1 to JAR-FCL 1.425

048	Mr. D. L. Conduit, UK CAA	<p>Referring to paragraph 2.</p> <p>The amendment proposed for the equivalent paragraph in JAR-FCL 2 should be included in JAR-FCL 1. This would amend the JAR-FCL 1 paragraph to read:</p> <p>"2 Examiners shall consistently apply JAR-FCL standards during skill tests / proficiency checks for licensing purposed based on JAR-FCL and / or JAR-Ops, as applicable. However, as [etc., etc.]."</p>	Consistency.	Noted, consistency achieved by other means.
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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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JAR-FCL 1 (Aeroplane)
Section 1
Subpart J – Theoretical Knowledge Requirements

Appendix 1 to JAR-FCL 1.470

004	Mr.Boller, LBA	<p>Syllabus for subject 030</p> <p>a) Add the word checks at the end of text for Syllabus item 031 04 02 00: Present text: Aircraft mass and balance Proposed text: Aircraft mass balance checks</p> <p>b) Syllabus item 031 04 02 02: Correct typing error abd into and</p> <p>c) Syllabus item 032 04 01 04: delete complete text after .. left blank</p> <p>d) Syllabus item 032 04 07 02 Present text: - power settings and speeds for... Proposed text: - power/thrust settings and speeds for...</p>	Editorials.	See response to comment 085.
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
005	Mr. Boller, LBA	In order to ensure a consistent and logical structure of the entire syllabus it is recommended to delete all x-es (indicators of applicability for ATPL/CPL/IR) from higher level topics if there exist a lower level (sub) topic. For explanation see appended page.	The present structure could cause confusions.	See response to comment 085.
012	Dr. Thomas von Borstel, LBA	Theoretical knowledge syllabus concerning subject 050 meteorology needs to be revised (see attachment).	Attached proposal refers to the recent conclusions drawn by the SET.	See response to comment 085.
014	Dr. G. de Jong	Comment received not in appropriate format. No alternative text offered. Whole comment will be forwarded to LSST(E) for consideration for future work.	General comments on syllabus.	See response to comment 085.
049	Mr. D. L. Conduit, UK CAA	Delete from the matrices under Instrument Rating all references to Operational Procedures [070] as an applicable subject.	070 is not applicable to the Instrument Rating. The LTE is requested to implement this immediately.	See response to comment 085.
050	Mr. B. Waddington, UK CAA	a) Change title to 'Human Performance' b) 040 02 01 00 Insert 'Basics of Flight Physiology'	<i>Harmonisation with ICAO Annex 1 plus correction of omissions and transcription errors.</i>	See response to comment 085.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		instead of 'Intentionally left blank'. c)040 02 03 03 After 'gastro-intestinal upset', insert 'entrapped gases, barotrauma'. d) 040 02 03 05 delete the word 'operating' before 'coping procedures'. e) 040 03 05 02 insert 'and motivation' immediately after '...in personality'. f)040 02 03 02 correct spelling of 'rhythm' in two places.	Note: Syllabus amendments input from Chair of 040 SET.	
051	Mr. B. Waddington, UK CAA	See text below.	Harmonisation and standardization Theoretical Knowledge for IR is common to both (A) and (H).	See response to comment 085.
<p>021/022: Revised syllabus agreed by SET but too late for NPA; it should be considered ASAP; perhaps include in expected NPA 23. Review syllabus numbering systems to harmonise use of fourth number group, sub-paragraphs, between subjects eg compare 010/061/062 with 050.</p> <p>010 01 01 02: Bullet points in IR (A) column should be repeated in IR(H) column</p> <p>021 02 01: Why is DC Electrics included in the IR syllabus when AC is not?</p> <p>021 01: By definition this topic is Aeroplane Systems and should not apply to IR (H) and therefore should not apply to IR (A) either as IR TK is common</p> <p>021 03: Recommend make Turbine Engines, 021 03 02, a separate topic as 21 04 and renumber remainder.</p> <p>021 03 01 08:</p>				

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
delete 'stray' horizontal line after 'colour coding'. 021 04 05 00: delete 'stray' horizontal line after 'principles of operation'. 022 01 02 05: Turn co-ordinator not relevant to (H); insert bullet points for (H) plus IR. 040 03 03 04: delete 'stray' horizontal line after 'communication model(s)'.				
062	Mr. G. Bammert, SET 010	See original comment and attachments.	Text presented in NPA 19 has been reviewed by the SET.	See response to comment 085.
055	Mr. H. Tigchelaar, NL subnet on Aeroplanes	See original comment.	See original comment.	See response to comment 085.
085	Mr. Michel Bedrine, DGAC France	We propose to postpone that part of NPA.	The LSST(H) in collaboration with the LSST(E) is working on a new frame for the FCL2. Consequently, the Helicopter theoretical syllabus will be change during the next year. The pragmatic solution should be to have a specific NPA for that purpose.	Accepted, This part of the NPA will be postponed. Item will transfer to a specific NPA on this matter. Comments will be considered when drafting this NPA.
086	Mr. Michel Bedrine, DGAC France	010 01 03 00 World Organisations. - objective, composition and structure 010 01 03 01 WTO/GATS 010 01 03 02 IATA	A limit must be given to the knowledge of the several world organisations.	See response to comment 085.
087	Mr. Michel Bedrine, DGAC France	010 01 04 00 European Organisations, objectives and relevant documents	The proposal made by NPA 19 is not consistent. On one hand we ask for a general knowledge about	See response to comment 085.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		<p>- objective, composition and structure.</p> <p>010 01 04 01 European Commission (EC)/ EASA</p> <p>010 01 04 02 European Civil Aviation Conference (ECAC)</p> <p>- ECAC recommendation on dry and wet leasing (ECAC 21/1)</p> <p>010 01 04 03 02 Joint Aviation Authorities (JAA)</p> <p>- the JAR documents</p> <p>010 01 04 04 03 Eurocontrol</p>	<p>European organisations and on the other hand we restrain the study to just one document which is just a recommendation.</p> <p>Moreover, if it is just a list of the JAR documents which is requested, what is the use of it for a pilot ? The main documents needed for a pilot will be studied in the relevant papers (JAR 23, JAR 25, JAR OPS, JAR FCL...)</p> <p>Therefore we suggest the same generic but nonetheless restrictive line for 010 01 03 00 and 010 01 04 00.</p>	
088	Mr. Michel Bedrine, DGAC France	010 03 02 00 Common and registration marks.	Such a line in the syllabus is useless and can lead to very stupid and completely useless MCQs. Registration marks are listed in every good documentation.	See response to comment 085.
089	Mr. Michel Bedrine, DGAC France	010 04 00 00 Annex 1 - Personnel Licensing 010 04 01 00 Definitions	Instead of reducing the ICAO annex to the FCL part, there is no more need now that the FCL system is achieved, for an ICAO knowledge of	See response to comment 085.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
		010 04 02 00 Relevant Parts of Annex 1 connected to JAR-FCL 1, 2 & 3. JAR-FCL 1 Foreword, Definitions and Requirements (Section 1)	the licensing system. We would tend to support in this topic the knowledge of the license the students are applying for!	
090	Mr. Michel Bedrine, DGAC France	010 06 07 00 : Include the use of TAWS(cf doc 7030)		See response to comment 085.
091	Mr. Michel Bedrine, DGAC France	010 07 00 00 : Annex 11, Doc 4444 Air Traffic Services Air Traffic Services (based on Annex 11, Doc 4444, and Eurocontrol documentation) 010 07 01 00 : Definitions 010 07 02 00 : ATS Safety Management 010 07 03 00 : ATS System, air traffic flow management - CFMU, slot allocation procedure, slot allotment message	According to 033, if the CFMU and the slot procedure is relevant to 010, we suggest to make it clear and to modify the title of the topic and to add one line.	See response to comment 085.
092	Mr. Michel Bedrine, DGAC France	010 07 12 00 : Phaseologies	This part is not relevant to 010, we must leave this knowledge to 090 to avoid any overlaps.	See response to comment 085.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
093	Mr. Michel Bedrine, DGAC France	022 01 06 00 Flight Management System (FMS) - general principles - inputs and outputs of data - Database content and elaboration - Different modes, functions and computations - Navigation accuracy and approach capability		See response to comment 085.
094	Mr. Michel Bedrine, DGAC France	033 05 03 00 : Submission of the flight plan (Note: procedures for the submission of flight plans is taught and examined in 010) - CFMU, slot allocation procedure, slot allotment message	We are surprised nothing is said about CFMU and the slot allocation system. This part can be of the utter utility, even for a CPL or a private IR, and this part is relevant to 033. According to us, basic knowledge from CFMU to the Slot Allotment Message must be given. If this is what is meant by note (cf 033 05 03 00), it must be more explicit and moreover the 010 SET must be advised as no line in the present syllabus (010 NPA 19) seems to be dealing with this matter. 1) If this is not, we suggest to introduce a new line in the syllabus: 033 05 03 00 : Submission of the flight plan	See response to comment 085.

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Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
			- CFMU, slot allocation procedure, slot allotment message 2 - Make the note of the line 033 05 03 00 more clear.	
094	Mr. Michel Bedrine, DGAC France	Renumber 081 02 081 03 081 03 081 04 081 04 081 02 081 02 02 03 (- neutral point) 081 03 01 06 : position of the neutral point with Mach number.	We wish to underline the influence during transonic and supersonic stage, on the displacement of the neutral point. The advance of the neutral point in supercritical and its final position backward for every kind of profile in pure supersonic must be known. This means topics 081 02 and 03 must be presented after topic 081 04 in which the definition of the neutral point is given. Moreover a specific line must be introduced in 081 02 02 03 (- neutral point) and 081 03 01 06 : position of the neutral point with Mach number. 081 03 01 02 : Last but not least, could you please tell me what is the influence of aeroplane mass on supersonic phenomena?	See response to comment 085.

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JAR-FCL 1 (Aeroplane)
Section 2
AMC / IEM D – Commercial Pilot Licence

AMC FCL 1.160 & 1.165[A][4]

082	Mr. Michel Bedrine, DGAC France	See box below.	The AMC 1.160 & 1.165 (a) (4) describe guide lines for CPL training in a BITD, but regulation is missing in the part 1. The PPL side has been well written:" regulation in JAR-FCL 1.120 and description of the crediting in Appendix 1 to JAR-FCL 1.125".	Accepted, for consistency between JAR-FCL 1 section 1 and 2.
<p>CPL(A) modular course (See JAR-FCL 1.125(c)) (See JAR-FCL 1.160, 1.165 & 1.170) (See Appendix 1 and 2 to JAR-FCL 1.170) (See AMC FCL 1.160 & 1.165(a)(4)) (See Appendix 1 to JAR-FCL 1.470) (See IEM-FCL 1.170)</p> <p>FLYING TRAINING</p> <p>10 Applicants without an instrument rating shall be given at least 25 hours dual flight instruction (see AMC FCL 1.160 & 1.165(a)(4)), including 10 hours of instrument instruction of which up to 5 hours may be instrument ground time in a BITD or a FNPT I or II or a flight simulator (See AMC FCL 1.160 & 1.165(a)(4)). Applicants holding a valid IR(A) shall be fully credited towards the dual instrument instruction time. Applicants holding a valid IR(H) may be credited up to 5 hours of the dual instrument instruction time, in which case at least 5 hours dual instrument instruction time shall be given in an aeroplane.</p>				

Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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JAR-FCL 1 (Aeroplane)
Section 2
AMC / IEM – Class and Type Rating

AMC FCL 1.261[C][2][3.3]

052	Mr. D. L. Conduit, UK CAA	Insert italicized text into 3 rd sentence: "When the sub contracted organization is not approved by a JAA Member State the approving Authority of the TRTO should <i>include the sub contracted organization in the approval process and</i> be satisfied that the standard of training... [etc., etc]."	Appendix 2 to JAR-FCL 1.055, paragraph 7 requires that a TRTO's arrangements with other training organizations are subject to the approval of the Authority . The above text is intended to reflect and support the approval aspect included in the JAR-FCL section 1 requirement.	Accepted.
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AMC FCL 1.261[C][2][7.1]

053	Mr. D. L. Conduit, UK CAA	In 3 rd sentence after 'Such systems' delete '...should...' and insert '...may...'.	Should implies a recommendation whereas the context merely requires a discretionary option.	Accepted.
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AMC FCL 1.261[C][2][8.1]

054	Mr. D. L. Conduit, UK CAA	In 1 st sentence after '...addressed by distance learning...' insert '...', if approved [see paragraph 1.2, ...'	It is clear from paragraph 1.2 that the expectation is that type rating courses will for the most part be full time attended courses with only particular circumstances allowing for distance learning.	Accepted.
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Comment/Response Document NPA-FCL 1 – 19 (Aeroplane)

Comment number	Commentator	Proposed text/comment	Reason(s) for proposed text/comment	Response
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**JAR-FCL 1 (Aeroplane)
Section 2
AMC / IEM H – Instructor Ratings**

IEM FCL 1.355

001	Mr. Andreas Medlhammer Motorfluggruppe Regensburg e.V	See text below.	Form IEM 1.355 doesn't cover requirements set out by JAR-FCL 1.355	Noted, this item is not part of this NPA. Working Paper is required through an Interested Party represented in the Licensing Sectorial Team.
<p>In IEM FCL 1.355, the revalidation and renewal form for a flight instructor rating, one important cell for input of data is missing. In JAR-FCL 1.355(a)(1) 10 hours instruction for an IR within 12 months preceding the expiry date of the FI rating is demanded. The revalidation and renewal form of IEM FCL 1.355 however has just an input cell for instrument instruction time during the preceding 36 months The correct form could look like this (see box below).</p>				
Instructor applying for revalidation of Flight instructor Rating should enter the instructional hours flown during the preceding 36 months				
SINGLE –ENGINE		MULTI-ENGINE		INSTRUMENT
DAY	NIGHT	DAY	NIGHT	
Total instructional hours (preceding 36 months)				
Total instructional hours (preceding 12 months)			THEREOF INSTRUMENT:	