

## JAR-OPS 1 NPA-OPS 16: SUBPART N - FLIGHT CREW

### COMMENT - RESPONSE DOCUMENT

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
1.	000054	General	FCL/C & LicDiv	Ops/FCL WG to note comments	Noted		No change to NPA	Noted
2.	000016 000028 000080 000079	General General General General	ECA Swiss Air Force AVI Agency CAA Hungary	Agree in toto with the NPA	Noted		No change to NPA	Noted
3.	000049	General	FCL/C & LicDiv	General description of HF and MCC training under JAR-FCL(no specific proposal)	Noted		No change to NPA	Noted
4.	000050 000081	General General	FCL/C & LicDiv LFV	The HF training in JAR-FCL and JAR-OPS require closer alignment. FCL will support MCC being changed to 'Basic CRM' which would require a change to the nomenclature within JAR-OPS.	Accepted	It was agreed that the connection between MCC and the initial CRM course should be placed in context and the current nomenclature does not indicate any connection	The initial CRM course referred to in sub-part N should be altered to: <b><i>“Initial Operators CRM Course”</i></b>	Agreed
5.	000052 000084	General 1.945 & 1.965	FCL/C & LicDiv LFV	The replacement of “ <i>applicable requirements of JAR-FCL</i> ” by “ <i>requirements applicable to the issue of Flight Crew Licences</i> ” could create confusion and misinterpretation.	Noted	To be discussed within the JAR OPS/FCL co-ordination committee.	No change to NPA	Noted
6.	000055	General	IFALPA	No further comments or objections	Noted. The endorsement of IFALPA is particularly welcome.		No change to NPA	Noted
7.	000067	General	CAA UK	A number of references to “ <i>all major</i> ”	Rejected	The amplification is detailed in Table 1 of	No change to NPA	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
				<i>topics of CRM training</i> ” are made but it is not clear what this means		AMC OPS 1.943/1.945(a)(9)/1.955(b)(6)/1.965(e)		
8.	000067	General	CAA UK	The statement “elements of CRM training” in the operators conversion course was too vague.	Rejected	To dictate which elements should be covered would be too formalised and the conversion syllabus will be overseen by the National Authorities with the acceptance of the Ops Manual.	No change to NPA	Agreed
9.	000069	1.965	SKYJET AC	The recurrent training may be reduced to one day per year	Rejected	The existing wording in JAR-OPS provides the level of flexibility required by smaller operators.	No change to NPA	Agreed
10.	000069	1.965	SKYJET AC	Line checks should not be required for operators with less than 6 employees.	Noted	The requirement for a line check is not part of NPA 16.	No change to NPA	Agreed
11.	000057	1.943	Crossair	Para (b) is against the principle of Grandfather Rights	Rejected	It goes against the fundamental requirement for crews to have an understanding of HF and CRM.	No change to NPA	Agreed
12.	000001	1.940	CAA Denmark	An implementation period should be introduced after NPA 16 applicability to ensure that self employed/freelance pilots are not treated differently from other crew members i.a.w. JAR-OPS 1.943	Accepted	The self employed/freelance pilot must have completed an initial operators CRM course in the past, otherwise the proposed situation should pertain to ensure that the pilot does attend at least one initial operators CRM course.	JAR-OPS 1.940(a)(7) <i>“...unsupervised line flying. However, for crew members serving the operator as a commander after 1 April 2002, initial CRM training shall be completed before commencing unsupervised line flying unless the crew member has previously completed an initial operators CRM course</i>	Agreed
13.	000056	1.940	Crossair	That freelance pilots should be treated the same as full time crew members	Rejected	The proposal would enable a freelance pilot to avoid an initial operators CRM course if he/she changed company within a year.	No change to NPA	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
14.	000003	1.943(a)	CAA Sweden	The actual date of JAR-OPS applicability should be stated rather than the statement of “JAR-OPS applicability”	Accepted in principle	It is accepted that a specific date is required.	JAR-OPS 1.943(a) <b>“Flight crew who are already operating as flight crew members in commercial air transportation and who have not completed an initial operators CRM course shall complete an initial operators CRM course by 1 April 2002.”</b>	Agreed
15.	000015	1.943(a)	CAA Finland	The initial operators CRM course could be completed during the Operators conversion course.	Noted	The wording in NPA16 does not preclude the initial operator’s CRM course from being conducted during the conversion course.	No change to NPA	Agreed
16.	000030	1.943(a)	ATF	The description of the qualification of the trainer should be moved to AMC material.	Rejected	The requirement for qualification personnel is Section 1 material and is consistent with other training requirements.	No change to NPA	Agreed
17.	000031 000032	1.943(d) 1.965(3)	ATF ATF	There is no need for the statement that the detailed training syllabus in the ops manual is acceptable to the Authority as the content of the ops manual is accepted by the Authority.	Accepted		JAR-OPS 1.943(d), para ends with: <b>“...included in the Operations Manual.”</b> JAR-OPS 1.945(3) Delete <b>“...and acceptable to the Authority.”</b>	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
18.	000082	1.943(b)	LFV	A new AMC should be introduced to give guidance for Instructors	Rejected	There appeared to be some confusion between the theoretical HF course and the Operator's CRM course.  Sufficient guidance is given in Table 1 of AMC OPS 1.943/1.945(a)(9)/1.955(b)(6)/1.965(e)	No change to NPA	Agreed
19.	000083	1.943(d)	LFV	The need for educational objectives based upon knowledge and awareness requirements.	Rejected	Whilst the FCCCSG agreed with the sentiment expressed it felt that the practical application would be difficult, if not impossible.	No change to NPA	Agreed
20.	000072	1.943 + AMC	LFT	The deletion of the words <i>theory</i> and <i>theoretical</i> in JAR-OPS 1.943 et al	Rejected	Whilst the HPL training includes some practical aspects the ATPL course is theoretical	No change to NPA	Agreed
21.	000063	1.965(a)	CAA UK	Typographical changes	Accepted		JAR-OPS 1.965 para (a) <b>“General”</b>	Agreed
22.	000063 000073	1.965(b) 1.965	CAA UK Alitalia	Typographical changes	Accepted		JAR-OPS 1.965 <b>“(b) Operator etc.”</b>	Agreed
23.	000008	1.965(a)(3) (iv)(B)	DGAC	Acceptability for CRM trainers creates an administrative burden for the Authority	Rejected	The acceptance of the criteria ensures the adequate quality of CRM training in Industry. In addition the administrative burden is small, noting that ‘acceptance’ not ‘approval’ is required.	No change to NPA	Agreed
24.	000033	1.965(a)(2)	ATF	The repetition of instructing according to a fixed programme cannot help with dealing with unusual situations and can lead to student de-motivation.	Rejected	Appendix 1 to JAR-OPS 1.965 makes clear that the programme should be dynamic. It is ongoing and should reflect the para (a) 4 ii k.	No change to NPA	Agreed
25.	000034	1.965(a)(3)	ATF	It asks for qualification before the	Noted	The suggested changes are not part of NPA	No change to NPA	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
	000035 000036	(i) 1.965(a)(3) (ii) 1.965(a)(3) (iv)	ATF ATF	subject has been taught by many organisations and personnel		16.		
26.	000037	1.965(a)(3) (ii)	ATF	Personal assessment should be broadened to all persons involved	Rejected	The purpose of the feedback is to improve the performance of the individual.	No change to NPA	Agreed
27.	000068	1.965(a)(3) (iv)(A)	CAA UK	The NPA implies that personnel conducting recurrent training need to be qualified to the same level as personnel conducting initial training.	Rejected	The wording “ <b>suitably qualified</b> ” does not imply that the training has to be to the level required for initial training where the requirement is for a “ <b>CRM trainer acceptable to the Authority</b> ”.	No change to NPA	Agreed
28.	000023 000025	1.965(a)(3) (iv)(B) 1.965 Appendix 1	AEA AEA	The use of modular training should be deleted.	Rejected	A great deal of the value of CRM training would be lost if the modular approach is abandoned and the need for a suitably qualified trainer dropped.	No change to NPA	Agreed
29.	000038	1.965(b)(3) (v)	ATF	References should be added to help clarify what is required.	Rejected	The information is provided in the IEM and the suggested amendment would overcomplicate the JAR.	No change to NPA	Agreed
30.	000078	1.965(e)	BRA	(a) The 8 modules are better covered over a four year cycle which fits in with OPCs  (b) The CRM assessment of an individual could be done by a fellow crew member.	(a) Rejected  (b) Rejected	(a) The 3 year cycle is consistent with other recurrent training requirements i.e. SEP  (b) The assessment is of the crew therefore, where practical (see comment 000021), the check captain should not be part of the crew.	(a) No change to NPA  (b) No change to NPA	Agreed  Agreed
31.	000065	1.965(g)	CAA UK	To include the remainder of the month for simulator recurrent training.	Noted	This was not part of the NPA proposals but confirmation is anticipated from an OPS/FCL Coordination meeting to be held in early 2001..after which a separate proposal will be made.	No change to the JAR. At present.	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
32.	000024	1.945 Appendix 1	AEA	The need for suitably qualified personnel requires to be stated to add clarity	Accepted		App 1 to JAR-OPS 1.945 <b>“(c) .....course and conducted by suitably qualified personnel.”</b>	Agreed
33.	000012	1.965 Appendix 1	Martinair	The order of training during the operators conversion course is too restrictive.	Rejected	This para has not been altered by NPA 16, although the FCCCSG understand that this is an ongoing concern among some operators.	No change to NPA	Agreed
34.	000004	1.965 Appendix 1 (a) (4) (ii) (K)	LFV	The reference should be to the operators own programme.	Accepted		App 1 to JAR-OPS 1.965 <b>“(K) .....identified by the accident.....”</b>	Agreed
35.	000074	1.965 Appendix 1	Alitalia	(a) Line training does not provide sufficient activity to assess CRM. A loft exercise should be used instead.  (b) The person conducting recurrent checking should be trained in CRM concepts and assessment of CRM skills.	(a) Rejected  (b) Accepted	(a) The assessment of CRM is not necessarily restricted to LOFT alone. AMC OPS 1.943/1.945(a)(9)/1.955(b)(6)/1.965(e) para 8.4 covers this point.  (b) The FCCCSG agree but feel this needs to be stated in the JAR so that it applies to both the TRE and the SFE..	(a) No change to NPA  (b) JAR-OPS 1.965(a)(4) (i) <b>“...Flight Examiner, trained in CRM concepts and the assessment of CRM skills;.....”</b>	Agreed  Agreed
36.	000009	1.965 App1(b)(3) (ii)(A)	DGAC	(a) There is no need for a methodology for the assessment of CRM skills  (b) Feedback should be to the crew not the individual	(a) Rejected  (b) Partially agreed.	(a) A methodology is essential to ensure objectivity and standardisation.  (b) The individual needs to understand how his/her own CRM skills can be improved regardless of who the other crew members are.	(a) No change to NPA  (b) 1.965 App1(b)(3)(ii) (A) <b>“...feedback to the crew collectively and</b>	Agreed  Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
							individually and ....”	
37.	000066	1.965 App1(b)(1) (iii)	CAA UK	The reference to issue is incorrect in the context of recurrent training	Accepted		App 1 to JAR-OPS 1.965(b)(1)(iii)  “...applicable to the revalidation or renewal of the aircraft type or class rating must be....”	Agreed
38.	000021	1.965 App1(b)(3)	AEA	Long haul operations present particular crewing difficulties when a separate Line Check captain is required and a second Captain is not always a practical possibility.	Accepted.	The FCCCSG agree that long haul operations have particular crewing problems, and considered a proposal from IFALPA that, when additional crew are carried for the purpose of extending flight time limitations, the person conducting the line check may be part of the operating crew if acceptable to the Authority. IFALPA suggested further that on such flights no CRM assessment of the crew shall be made. This is considered to be unacceptable. During the FCCCSG discussion it was pointed out that these problems could apply equally to operators of small aeroplanes and to aeroplanes certificated for single crew operations but required under JAR-OPS to be operated by two pilots. The FCCCSG agreed that this subject merited much wider discussion following which an appropriate revised proposal would be circulated.	No change to JAR text at present.	Closed
39.	000017	1.965 App1(b)(3)	Monarch Airlines	The current CRM training should be sufficient to enable Line Check Captains	Rejected	The assessment of CRM skills are not covered by current CRM training	No change to NPA	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
				to assess CRM skills				
40.	000059 000060 000061 000062	1.965 App1(b)(3) (ii)(A) and AMC & IMC OPS 1.943/1.94 5(a) (9)/1.955(b ) (6)/1.965(e )	BALPA	Assessment should be crew based and not individual	Rejected	Feedback should be provided both to the crew and to the individual but assessment should be individually based.	No change to NPA	Agreed
41.	000085	AMC OPS 1.943/1.94 5 etc.	CAA SWEDEN	Ground persons should not be included in the term “supporting facilities” but should be included separately	Accepted	It should be clear that support personnel are included in the available resources	AMC OPS 1.943/1.945(a) (9) etc. para 1.1 <b>“.....supporting facilities and persons) to .....”</b>	Agreed
42.	000086	AMC OPS 1.943/1.94 5(a)(9) etc. para 2.1	CAA Sweden	The word “should” is not a proper word for the context	Accepted	The proposed revision is clearer.	AMC OPS 1.943/1.945(a) (9) etc. para 2.1 <b>“...programmes are designed to provide knowledge of.....”</b>	Agreed
43.	000070	AMC OPS 1.943/1.94 5(a)(9) etc.	SKYJET AG	A change of operator might not mean a change of CRM course provider (see para 2.4) if the previous operator used the same provider. Therefore additional training might not be required.	Accepted	Some small operators will pool CRM expertise.	AMC OPS 1.943/1.945(a) (9)/1.955 (b)(6)/1.965(e) para 3.1 <b>“...type), unless the two operators use the same CRM training</b>	Agreed



No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
							provider.”	
44.	000075	AMC OPS 1.943/1.945(a)(9) etc.	Alitalia	(a) Para 5.1 & 6.2 Removal of reference to modular training  (b) Para 6.1. The number of hours per topic should be specified to prevent vagueness.	(a) Rejected  (b) Rejected	(a) See 000023 (Item No. 28)  (b) The addition of hours per topic would be too prescriptive.	(a) No change to NPA  (b) No change to NPA	Agreed  Agreed
45.	000026	AMC OPS 1.943/1.945(a)(9) etc.	AEA	(a) Para 5.1 & 6.2 Removal of reference to modular training  (b) Para 6.1. ‘Overview’ and ‘In Depth’ require more amplification.	(a) Rejected  (b) Accepted, although the FCCCSG considered that this should be section 2 material.	(a) See 000023 (Item No. 28)	(a) No change to NPA  (b) IEM OPS 1.943/1.945(a)(9)/1.955(b)(6)/1.965(e)  <b>5. Levels of Training Overview</b>  <b>When overview training is required it will normally be instructional in style. Such training should refresh knowledge gained in earlier training.</b>  <b>In Depth</b>  <b>When In Depth training is required it will normally be interactive in style and should include, as appropriate, case studies, group discussions, role play</b>	Agreed  Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
							<b>and consolidation of knowledge and skills. Core elements should be tailored to the specific needs of the training phase being undertaken.</b>	
46.	000064	AMC OPS 1.943/1.945(a)(9) etc.	CAA UK	Editorial changes to clarify the role of the operator and Authority.	Accepted		AMC OPS 1.943/1.945(a)(9)/1.955 (b)(6)/1.965(e) para 2 <b>“2.3 An operator should ensure that initial CRM.....”</b> <b>“2.4.....another operator, a third party or training organisation acceptable to the Authority. In this event, the operator should ensure that the content of the course meets his operational requirements. When crew members.....”</b>	Agreed
47.	000006	AMC OPS 1.943/1.945(a)(9) etc.	LFV	Experienced non-flight crew HF instructors should be permitted to continue as CRM instructors and gain additional authorisations.	Partially accepted	Whilst the FCCCSG accept the spirit of the proposal it is felt that this situation is already covered in JAR-OPS 1.943(c), which allows for the assistance of experts if required.	No change to NPA	Agreed
48.	000051	JAR OPS 1.943(b).	FCL/C & LicDiv	(a) There is no reference to MCC.	(a) Rejected	(a) Either the ATPL holder will have undergone MCC training as part of the type rating or will have experience of a multi-crew	(a) No change to NPA	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
				(b) The word 'shall' must be used instead of 'should'.	(b) Accepted	environment. (b) 'should' changed to 'shall'.	(b) JAR OPS 1.943/(b) <b>"...Licences) shall be completed....."</b>	Agreed
49.	000053 000011	AMC OPS 1.943/1.945(a)(9) etc.	FCL/C & LicDiv DGAC	Editorial changes to clarify the case of revalidating a rating	Accepted		AMC OPS 1.943/1.945(a)(9)/1.955 (b)(6)/1.965(e) para 8.4 <b>".....Type Rating revalidation/renewal check.....of the Type Rating revalidation/renewal."</b>	Agreed
50.	000005	AMC OPS 1.943/1.945(a)(9) etc.	LFV	The word theory should be included for clarity.	Rejected	By definition the ATPL HF examination is theoretical.	No change to NPA	Agreed
51.	000018	AMC OPS 1.943/1.945(a)(9) etc.	Monarch Airlines	Existing CRM trainers should have 'Grandfather Rights'.	Noted	This is already covered by the provisions of AMC OPS 1.943/1.945(a)(9)/1.955(b)(6)/1.965(e) para 2.2(b)(i)	No change to NPA	Agreed
52.	000042	AMC OPS 1.943/1.945(a)(9) etc.	ATF	The operator CRM course should cover basic CRM.	Rejected	The initial CRM course is company orientated, as explained at para 7.2 of the explanatory notes.	No change to NPA	Agreed
53.	000043	AMC OPS 1.943/1.945(a)(9) etc.	ATF	The feedback should include a verbal element	Noted	This is adequately covered at IEM OPS 1.943 para 4.	No change to NPA	Noted

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
54.	000010	AMC OPS 1.943/1.945(a)(9) etc.	DGAC	There is no need for a methodology for the assessment of CRM skills	Rejected	See Comment 000009 (Item no 36).	No change to NPA	Agreed
55.	000045	AMC OPS 1.943/1.945(a)(9) etc.	ATF	Trainers should be trained before the procedures are published in the training manual.	Noted	This is adequately covered at IEM OPS 1.943 para 4.2.	No change to NPA	Agreed
56.	000044	AMC OPS 1.943/1.945(a)(9) etc.	ATF	More training is required on stress etc.	Rejected	The subject is adequately covered during the initial and command courses. The FCCCSG were of the opinion that 70% of accidents are not caused by stress.	No change to NPA	Agreed
57.	000039	AMC OPS 1.943/1.945(a)(9) etc.	ATF	It is not clear who is responsible for the utilisation of the resources.	Rejected	It is implicit that the wording refers to the individual.	No change to NPA	Agreed
58.	000040 000041	AMC OPS 1.943/1.945(a)(9) etc.	ATF	No Authority can ask for skills without giving a definition.	Rejected	The FCCCSG consider this is self explanatory.	No change to NPA	Agreed
59.	000007	AMC OPS 1.945(a)(9)	LFV	Attention to automatic mode function could lead to technical discussion replace CRM discussion	Accepted		AMC OPS 1.945 (a)(9) para 2. <b>“....automated systems. Special attention should be given to how automation increases the need for crews to have a common understanding of how the system</b>	Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
							performs, and any features of automation that make this understanding difficult.”	
60.	000027	AMC OPS 1.943/1.945(a)(9) etc.	AEA	(a) Clarification of the use of STDs is required	(a) Accepted		(a) IEM OPS 1.943 para 2. “.....devices which reproduce, in an acceptable way, a realistic operational environment and permit interaction. This includes, but is not limited to, simulators with appropriate LOFT scenarios.	Agreed
	000022 000020	IEM OPS 1.943/1.945 etc.	AEA Monarch Airlines	(b) Clarification of when CRM assessment can take place is required.	(b) Accepted	(b) The FCCCSG felt the crew member should be required to have had a period within the company culture prior to CRM assessment.	(b) para 4.3 “..has completed the initial CRM course and completed the first OPC. For first.....”	Agreed
61.	000077	IEM OPS 1.943/1.945 etc.	FOCA	Assessing CRM skills should refer to NOTECHS	Noted	This will depend upon further JAR-TEL discussions	No change to NPA	Noted
62.	000076	IEM OPS 1.943/1.945 etc.	Alitalia	(a) Use of STDs (b) Initial CRM should be conducted outside company premises whenever possible but always in groups.	(a) Noted (b) Rejected	(a) See comment 000027 (Item no 60) (b) The FCCCSG consider that the wording is adequate.	(a) No change to NPA (b) No change to NPA	Noted Agreed

No	Com# No	JAR-OPS Reference	Commentator	Summary of Comment	FCCCSG Position	FCCCSG Justification	Proposed Text or Ref	OC
63.	000046	IEM OPS 1.943/1.945 etc.	ATF	General comment on the purpose of CRM training	Noted		No change to NPA	Noted
64.	000019	IEM OPS 1.943/1.945 etc.	Monarch Airlines	The initial CRM course away from company premises is impracticable.	Rejected	The IEM is a recommendation only.	No change to NPA	Agreed
65.	000047	IEM OPS 1.943/1.945 etc.	ATF	Authorities need to provide more definitions of standards etc.	Noted	This is covered in the introduction, para 8.	No change to NPA	Noted
66.	000071	IEM OPS 1.965	SKYJET AG	Business Jet operators do not necessarily have access to representative training equipment	Noted		No change to NPA	Noted
67.	000013	IEM OPS 1.965	Martinair	The requirement for training in an approved simulator should be included in Section 1 material	Rejected	The wording in NPA 16 does not change in any substance the existing meaning, but only serves to clarify.	No change to NPA	Agreed
68.	000048	IEM OPS 1.965	ATF	The feedback following line checks should involve the examiners skills.	Noted	This is covered in IEM OPS 1.943.	No change to NPA	Noted
69.	000087	General	CAA Sweden	The initial CRM course should be 7 and 14 hours respectively rather than one day and two days.	Rejected	It is important to retain continuity during the training and not split the course into parts.	No change to NPA	Agreed