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| Title | Implementing Rules for Pilot Licensing - Part-FCL |
| NPA Number | NPA 2008-17b |

European Gliding Union (EGU) has placed **42** unique comments on this NPA:


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| 4540 | (General Comments) | 0 | The comments in this response to NPA17b represent the formal response of the European Gliding Union. EGU represents the national gliding organisations of 25 countries (Austria, Belgium, Croatia, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Lithuania, Luxembourg, The Netherlands, Norway, Poland, Serbia, Spain, Slovakia, Slovenia, Sweden, Switzerland & UK) | |
| 4544 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.010 Definitions | 3 - 5 | <p>FCL.010 Definitions</p> <p>Comment: There is no definition of the proficiency check and of the skill test here Instead theses definitions "are hidden" in GM to FCL.010 (page 170). Since these definitions are important we would prefer to have them transferred here We also believe that instructors should be allowed to perform proficiency checks (see our comment on page 16)</p> <p>EGU Proposal: Transfer the definitions of skill tests and proficiency checks from the GM to FCL 010</p> | |
| 4546 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.010 Definitions | 3 - 5 | <p>FCL 010 - Definition of a TMG: "A touring motor glider (TMG) means a specific class of powered sailplane having an integrally mounted, non retractable engine and non retractable propeller. ..."</p> <p>Comment: According to the definition, a Touring Motor Glider is a powered sailplane. The other types of powered sailplanes (which in JAR FCL are defined as Self Sustained Gliders and as Self Launching Gliders) are only defined by default, as being "non TMG" powered sailplanes. This leads to some ambiguities in the</p> | |

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| | | | <p>definition of privileges of the LPL(S) and SPL (See our comments on FCL.105.S, FCL.135.S, FCL 205.S and FCL.235.S) Therefore, EGU believes that a clear definition of every type of powered sailplane should be included in the definitions.</p> <p>EGU Proposal A powered sailplane is a glider equipped with an engine. There are three types of powered sailplanes:</p> <ul style="list-style-type: none"> • Touring Motor gliders (TMG) which have an integrally mounted, non-retractable engine and non-retractable propeller ... • Self launched gliders which have a retractable engine or a retractable propeller and are capable of taking off and climbing under their own power. When the engine is inoperative, they have the characteristics of a pure sailplane. • Self Sustained gliders which must be launched like a pure sailplane not equipped with an engine, but can climb slowly to extend a flight once the engine or the propeller is deployed and started. When the engine is inoperative, they have the characteristics of a pure sailplane. | |
| 4548 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.015 Application and issue of licences, ratings and certificates | 5 | <p>FCL.015 Para (a): "An application for the issue, revalidation or renewal of pilot licences and associated ratings and certificates shall be to the competent authority. The application shall be..."</p> <p>Comment: One of the demands of the gliding movement was the possibility to empower national gliding bodies (Federations or National Aero Clubs) to issue and revalidate licences, ratings and certificates for instructors/examiners on behalf of the competent authority (the "Assessment Bodies" in the initial set up) Regulation (EC) 216/2008 recognises that qualified entities may deliver specific certification tasks for the competent authority. It is proposed that the text within FCL.015 should be amended to read as such.</p> | |

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| | | | <p>EGU Proposal: (a) Any application for the issue, revalidation or renewal of pilot licences and associated ratings and certificates shall be made to the competent authority, or to the appointed qualified entity, in a manner established by this authority. The application shall be accompanied by evidence that the applicant complies with the requirements for the issue, revalidation or renewal of the licence or certificate as well as associated ratings or endorsements, established in this Part and Part Medical.</p> | |
| 4549 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.015 Application and issue of licences, ratings and certificates | 5 | <p>FCL. 015 Para (c) "A person shall not hold at any time more than one licence issued in accordance with this part"</p> <p>Comment: The meaning of the sentence is not fully understood. Does this mean that: (a) a pilot can only hold one EU licence and that if it is a 'higher' licence for a particular aircraft category (e.g. glider) – i.e. an SPL gives the privileges also of a LPL(S)? or (b) a pilot can only hold one EU licence for a particular aircraft category (e.g. a SPL) and cannot have two licences (from different countries, for example for an SPL)? Or (c) a pilot who holds, for example, an ATPL also has on the licence a rating, for example, for the LPL(S)?</p> <p>EGU assumes that this draft rule is intended to stop pilots holding a licence for the same aircraft category in more than one Member State. EGU understands that this rule shall ensure a clear assignment of a pilot to the responsibility of the competent authority of only one member state.</p> <p>EGU Proposal: EASA to clarify the interpretation of this statement, in the AMC / GM.</p> | |
| 4553 | B. Draft Opinion Part-FCL - Subpart A: General | 5 | <p>FCL.020 Para (b): "Before his first solo flight, a student shall be at least: (1)... (2) in the case of sailplane and balloons, 14 years of age</p> | |

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| | Requirements - FCL.020 Studen pilot | | <p>Comment: EGU strongly supports the proposed minimum age for first solo flights in a sailplane. It is important for the development of our sport that young people can be successfully educated and trained in such a way that they can fly solo at the age of 14. Several member states have allowed solo flying at this age for many decades and there has been no adverse safety case with this practice.</p> | |
| 4556 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.025 Theoretical knowledge examinations for the issue of licences | 5 - 6 | <p>FCL 025 Para (a) (1) "Applicants shall take the entire set of examination in one Member state"</p> <p>Comment: Clarification required: - if this means that the set of examinations for one category or aircraft / licence have to be taken in one Member State, then it is acceptable. - if it means that the examinations for different categories or aircraft / licence have to be taken in one (always the same) Member State, then this is not acceptable.</p> <p>EGU Proposal: EASA to clarify the interpretation of this statement, in the AMC / GM.</p> | |
| 4557 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.025 Theoretical knowledge examinations for the issue of licences | 5 - 6 | <p>FCL 025 Para (b) (2) (3)</p> <p>Comment: This paragraph is not fully understood. A clear definition of the meaning of "examination paper" or "subject" is needed in order to avoid misinterpretations. EGU understands the term "examination paper" as the written test of one subject e.g. meteorology. The term "subject" means in our understanding a topic of the syllabus e.g. meteorology.</p> <p>EGU Proposal: EASA to clarify the definitions or interpretation of 'examination' and 'subject(s)' in the AMC / GM.</p> | |
| 4558 | B. Draft Opinion Part-FCL - | 6 - 7 | <p>FCL.035 Crediting of flight time Para (a): "Unless otherwise specified in this Part, flight time to</p> | |

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| | Subpart A: General Requirements - FCL.035 Crediting of flight time and theoretical knowledge | | <p>be credited for a licence, rating, or certificate shall have been flown in the same category of aircraft for which the licence or rating is sought”</p> <p>EGU Comment</p> <p>Although the wording does not specifically exclude flight time on Annex II aircraft, provision should also be made to count flight experience gained on Annex II or third country aircraft for the purpose of issue, renewal, revalidation of licences. This could be done by using a long-lasting conversion system set up by Member States.</p> <p>For example, Annex II aircraft include state aircraft (e.g. B737. Learjet, Citation service for member of parliament), Police or Rescue Helicopter, military aircraft. It would be absurd if a pilot of police helicopters had to fly extra hours on a non-state aircraft to qualify for the LPL (H), PPL (H) or CPL (H). Other examples are historic aircraft, microlight aeroplanes etc.</p> <p>Third country aircraft: flight hours on e.g. N-registered aircraft.</p> <p>In gliding, there is a specific issue with the fact that, in various EU countries, many sailplanes and powered sailplanes remain in Annex II. Since these gliders have been designed under JAR 22 or similar design codes, there are no notable differences in practical and theoretical skills required by their pilots. Therefore, hours flown on such sailplanes and powered sailplanes should be credited for a SPL or LPL(S) licence and their revalidation. There is no safety case to exclude experience in Annex II sailplanes for the purposes of EU sailplane licences, and to exclude such experience will give rise to considerable discontent and annoyance in the EU glider pilot population. EU glider pilots fly sailplanes which are both within the scope of EASA and outside the scope of EASA without differentiation in practical terms. To force a pilot, who mainly flies Annex II sailplanes but wants to maintain an EU licence for sailplanes within the scope of EASA, to fly additional hours just to renew his EU licence is unnecessary from a safety point of view. Explicit provision (e.g. in AMC) for such time credits would be welcome.</p> <p>EGU Proposal:</p> | |

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| | | | <p>Add to FCL 035 (a) 1)</p> <p>Hours flown on Annex II sailplanes and powered sailplanes may be credited for a SPL or PPL(S) licence.</p> | |
| 4567 | <p>B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.050 Recording of flight time</p> <p>B. Draft Decision Part-FCL - AMC and GM - Subpart A: General Requirements - AMC to FCL.050 Recording of flight time</p> | <p>7</p> <p>173 - 181</p> | <p>AMC material for FCL.050 Recording of flight time</p> <p>Comment: The proposed format of the log book is not appropriate for gliding, due to an overload of details not related to this activity.</p> <p>EGU proposes to allow a reduced log book format in the AMC adapted to the specific requirements for gliding and/or ballooning to ensure flexibility for the different activities.</p> <p>EGU proposal: See attachment</p> | <p>Model logbook PPA.pdf (13.1kb) </p> |
| 4570 | <p>B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.055 Language proficiency</p> | <p>7 - 9</p> | <p>FCL.055 Language proficiency Para, (a) general</p> <p>Comment</p> <p>The European Gliding Union considers a general language proficiency endorsement inappropriate for two reasons: (a) language proficiency applies to a radio-telephony (R/T) licence, which is not mentioned, and (b) an R/T licence is only required when radio communications with Air Traffic Services (ATS) are involved. For this reason, glider pilots undergo R/T training and examination when they have the need to contact ATS, at an appropriate moment in their career as a glider pilot. Making R/T training a part of the basic LPL(S) or SPL training will, because of its complexity, unduly delay the access to the LPL(S) or SPL licence. Furthermore, cost plays an important role, obviously the more when a glider pilot, because of the airspace he flies in, has no need to contact ATS.</p> <p>EGU Proposed text: "Pilots who contact Air Traffic Services during flight shall possess a radio-telephony licence in the language(s) available by the ground station(s) involved, in conformity with Annex 1 of ICAO. For</p> | |

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| | | | pilots who fly VFR only, this licence shall encompass radio procedures as used in VFR flight only." | |
| 4571 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.055 Language proficiency | 7 - 9 | <p>FCL.055 Language proficiency, para (b)</p> <p>Comment</p> <p>The European Gliding Union supports the requirement for language proficiency tests, as long as languages, other than the native languages are concerned. These language tests shall be in conformity with ICAO Annex 1. Language proficiency shall, however, be a part of the training for the R/T licence. A language test in other than native languages may be required at certain intervals after the R/T licence has been obtained, in conformity with ICAO Annex 1.</p> <p>EGU Proposed text:</p> <p>"The applicant for an R/T licence shall undergo language training as a part of his training for the R/T licence. A language test in a language other than the pilot's native language may be required at certain intervals after the R/T licence has been obtained, in conformity with ICAO Annex 1."</p> | |
| 4572 | B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.055 Language proficiency | 7 - 9 | <p>FCL.055 Language proficiency, para (c)</p> <p>Comment</p> <p>The European Gliding Union considers an interval of 6 years sufficient to maintain an acceptable level of language proficiency for holders of an ICAO type R/T licence for VFR flight only, at the same time saving time and cost. Moreover ICAO specifies that language proficiency checks are not required at all under certain circumstances.</p> <p>EGU Proposed text.</p> <p>"In the case of R/T licences for VFR flight only, a language proficiency check shall be undergone in principle at intervals of 6 years, as specified by ICAO."</p> | |
| 4573 | B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL | 11 | <p>FCL.110.a LPL (A) Experience and crediting Para (b)</p> <p>According to this paragraph, glider pilots applying for an LPL(A) power flying licence (requiring at least 30 hours flying time) are only credited with 6 hours, whereas, according to FCL 110 S (b) and to SPL 110</p> | |

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| | - Section 1: Common Requirements - FCL.110 LPL - Crediting for the same aircraft category | | <p>(b), power flyers applying for an LPL(S) or SPL glider pilot licence (requiring at least 10 hours flying time) are also credited with 6 hours.</p> <p>Comment A power flyer therefore has to fly only 2 hours in a glider to apply for a glider pilot licence whereas a glider pilot has to fly 24 hours in aeroplanes for the LPL(A). This is illogical, since there is not that much more that a glider pilot needs to learn to gain the required skills for flying a powered aircraft. EGU believes that holders of a glider pilot licence should be credited with more hours. This would also help in recruiting tow plane pilots by making access to the power flying licence somewhat easier for glider pilots.</p> <p>EGU Proposal: (c) Crediting. Applicants holding a pilot licence for another category of aircraft, with the exception of balloons, shall be credited with 10 % of their total flight time as pilot-in-command in such aircraft, up to a maximum of 6 hours (10 hours for glider pilots) towards the requirements in (a).</p> | |
| 4574 | B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes | 15 | <p>General Comment: The EGU would like the requirements for the LPL(S) and SPL licences to be the same (except for the medical requirements and the commercial privilege). Unfortunately, there are a number of inappropriate differences between LPL(S) and SPL which we believe simply to be drafting differences: highlighted on the attached file.</p> <p>The EGU would like these discrepancies to be corrected</p> | |
| 4582 | B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.105.S LPL(S) - Privileges | 15 | <p>FCL.105 S (a) LPL(S) Privileges and conditions FCL.110.S (a) LPL(S) Experience requirements and crediting</p> <p>Comment As this is written, TMG are not powered sailplanes. This is not consistent with the definition of the TMG in FCL.10, according to which, a TMG is a specific type of powered sailplane.</p> <p>EGU Proposal: FCL.105.S</p> | |

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| | <p>and conditions</p> <p>B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.110.S LPL(S) - Experience requirements and crediting</p> | 15 | <p>a) The privileges of the holder of an LPL(S) for sailplane are to fly sailplanes and powered sailplanes.</p> <p>FCL 110.S</p> <p>a) Applicants for an LPL(S) shall have completed at least 10 hours of flight time in sailplanes or powered sailplanes.</p> | |
| 4584 | <p>B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.135.S LPL(S) - Extension of privileges to TMG</p> | 16 | <p>FCL.135.S LPL(S) Extension of Privileges to TMG</p> <p>Para (a)</p> <p>“The privileges of a LPL(S) shall be limited to flying sailplanes and powered sailplanes. This limitation may be withdrawn when the pilot has completed on a TMG:”</p> <p>Comment</p> <p>As this is written TMG are not powered sailplanes. This is not consistent with the definition of the TMG in FCL.10, according to which, a TMG is a specific type of powered sailplane. It may lead to ambiguities.</p> <p>EGU Proposal:</p> <p>The privileges of an LPL(S) shall be extended to touring motor gliders, when the pilot has completed on a TMG:</p> | |
| 4586 | <p>B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.140.S LPL(S) - Recency requirements</p> | 16 - 17 | <p>FCL.140.S Recency requirements</p> <p>a) (2) “ passed a proficiency check with an examiner on a sailplane every 6 years”</p> <p>EGU Comment :</p> <p>EGU strongly disagrees with the proficiency checks proposed here. The Basic Regulation 216/2008 para. 1e2 of Annex III requests the – flexibility as regards “examinations, tests and checks, proportionate to the level of risk of the activity”. EGU considers that requiring a proficiency check with a flight examiner every 6 years for a sporting activity in which instruction is generally given in the framework of clubs by volunteer instructors is largely over-prescriptive. Further, the use of the word</p> | |

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| | | | <p>'examinations' in the Basic Regulation should not infer that examinations can only be performed by 'examiners'. This interpretation seems to be borne out of JAA / ATPL thinking which does not transliterate to gliding. In the gliding world, generally, the structure of training is broadly that instructors instruct and oversee the general population of glider pilots whilst examiners instruct, examine and oversee instructors. In consequence, there are relatively few examiners in gliding and many more instructors. That is the hierarchy and it is a well-proven and safe structure. What justification or evidence has EASA for changing it?</p> <p>Such a proposed rule is impracticable because the European gliding movement will not be able to generate enough examiners to provide adequate coverage of clubs/geographic factors/number of checks to be carried out (bearing in mind we are volunteers). Such checks would also have a huge economic impact as shown in the RIA performed by the German Aero Club (see the DAeC comment about proficiency checks). Furthermore, the reporting procedure to the authority as described in the AMC page is overly bureaucratic. The result would be more and more people abandoning gliding due to the increased constraints, paperwork and financial burden.</p> <p>In the European gliding movement, the common, long-established and proven practice is to perform periodic check flights with flight instructors. These check flights are also performed when a new member, already qualified as a glider pilot, joins the club or when pilots do not show an acceptable competence or performance level due to the fact that they have not flown sufficiently. Neither the authority nor the examiners are involved in these checks. Nor do they need to be. In the case where a check flight is failed, additional training is performed until the pilot is back to an appropriate level of competence and this system is well accepted by all pilots. The annual accident statistics worked out by EGU (annually one fatality per 100,000 launches over the last 10 years) shows that this practice is reasonably safe.</p> <p>Therefore, EGU believes that a check flight with a flight instructor every 24 months is sufficient for</p> | |

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| | | | <p>ensuring an acceptable safety level. Such a rule would perhaps not follow the JAR FCL logic (which never applied to gliding!) but would be perfectly compliant with the Basic Regulation. Since instructors are qualified to assess if a pilot is able to fly solo and to perform skill tests for the issuance of a licence, there is no reason why they should not be allowed to perform such check flights.</p> <p>These check flights should be documented as an endorsement in the log book. No further revalidation requirement requiring communication with the licensing authority should be needed.</p> <p>The proposed rule is safe enough, avoids additional bureaucratic and financial burden, and would be accepted far more readily by all glider pilots.</p> <p>Additionally, we do not see why such a test could not be performed on a powered sailplane.</p> <p>EGU Proposal: FCL.140.S Recency requirements b) (2) " passed in the last 24 months a check flight with a LAFI(S) or a FI(S) instructor on a sailplane or a powered sailplane"</p> | |
| 4589 | B. Draft Opinion Part-FCL - Subpart C: Private Pilot Licence (PPL), Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) - Section 6: Specific requirements for the sailplane pilot licence - FCL.205.S SPL - privileges and conditions | 21 | <p>FCL.205.S SPL Privileges and conditions para (a) FCL 210.S SPL Experience requirements and crediting para (a)</p> <p>EGU Comment: Same remark as for FCL.105.S and FCL 110.S</p> <p>EGU Proposal: FCL.205.S a) The privileges of the holder of a SPL for sailplane are to fly sailplanes and powered sailplanes. FCL 210.S a) Applicants for an SPL shall have completed at least 10 hours of flight time in sailplanes or powered sailplanes.</p> | |

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| | B. Draft Opinion Part-FCL - Subpart C: Private Pilot Licence (PPL), Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) - Section 6: Specific requirements for the sailplane pilot licence - FCL.210.S SPL - Experience requirements and crediting | 21 | | |
| 4594 | B. Draft Opinion Part-FCL - Subpart C: Private Pilot Licence (PPL), Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) - Section 6: Specific requirements for the sailplane pilot licence - FCL.225.S SPL - Extension of privileges to touring motor gliders | 21 | <p>FCL.225.S Extension of privileges to touring motor gliders</p> <p>Comment:</p> <p>Same remark as for SPL.135.S</p> <p>EGU Proposal:</p> <p>The privileges of an LPL(S) shall be extended to touring motor gliders, when the pilot has completed on a TMG:</p> | |
| 4595 | B. Draft Opinion Part-FCL - Subpart H: Class and Type Ratings - Section 2: Specific Requirements | 37 | <p>FCL.740.A (b) (1)</p> <p>(i) "within the three months preceding the expiry date of the rating, pass a proficiency check in the relevant class in accordance with Appendix 9 to this Part with an examiner; or"</p> <p>Comment:</p> | |

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| | for the aeroplane category - FCL.740.A Revalidation of class and type ratings - aeroplanes | | <p>EGU does not agree with the three months "window" before expiry of the licence if the applicant was not able to fulfil the requirements given under (ii). EGU proposes that the period preceding the expiry date should be 12 months and that the check should be performed by a LAFI or FI.</p> <p>Justification for this is, that gliding is a seasonal activity, highly weather dependent, and particularly in northern Europe with restricted daylight hours and therefore, there is not the capacity at all clubs or in all countries to meet this requirement. A flight instructor will be able to validate the maintained skills of the applicant and no further financial burden will be generated. EGU does not anticipate any decrease in safety if the check is performed by a flight instructor. See also comment against FCL 140 S re roles of instructors and examiners in gliding.</p> <p>EGU Proposal: (j) "within the twelve months preceding the expiry date of the rating, pass a proficiency check in the relevant class in accordance with Appendix 9 to this Part with an instructor; or"</p> | |
| 4598 | B. Draft Opinion Part-FCL - Subpart I: Additional Ratings | 42 | <p>The cloud flying rating for glider pilots is missing</p> <p>Comment: Cloud Flying ratings for glider pilots exist in many Member States (Germany, UK, Ireland, Denmark, Sweden, Switzerland, Poland, Finland). There has never been any safety case justifying a removal of this privilege. We have the feeling that this rating has been removed from the initial proposals for purely political reasons because EASA does not want to develop a specific IMC rating for the LPL(A) licence. We would like to insist on the fact that the glider cloud flying rating has nothing to do with the IMC rating for instrument flying with powered aircraft. The removal of the cloud flying rating will have a serious impact on gliding and especially in the Northern European weather conditions. The removal of the privilege to fly close to, or where appropriate or necessary in cloud will have negative consequences on safety, operations and the economic viability of the sport. Therefore, the EGU asks EASA to reinstate the specific cloud flying rating in the implementing rules. The EGU acknowledges that this issue is now being addressed in FCL.008. The EGU hopes that a</p> | |

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| | | | <p>positive outcome will emerge from the FCL.008 process and that the necessary changes to the Implementing Rules will be made on a timely basis to ensure that transition arrangements from national licences to EU licences can be all-embracing and not divided between 'non-cloud flying' and 'cloud flying'.</p> <p>EGU Proposals: In Subpart G, Instrument Rating – IR, Section 1 Common Requirements FCL.600 IR - General (a) "Holders of a pilot licence shall only operate an aeroplane, helicopter or airship under IFR when " ,</p> <p>(b) "Holders of a pilot licence shall only operate a sailplane (sailplane or powered sailplane excluding TMG) within cloud when: (1) they hold a Sailplane Cloud Flying Rating and (2) within airspace categories according Member States' relevant airspace rules.</p> <p>In Subpart I Additional Ratings FCL.8xx Sailplane Cloud Flying Rating (SCFR)</p> <p>(a) If the privileges of a LPL(S) or SPL are to be exercised in IMC conditions, in accordance with Member States' relevant airspace rules, applicants shall have completed at least: (1) 30 hours as either pilot-in-command or dual flying in either sailplanes or powered sailplanes after issue of the licence; and (2) A course of theoretical knowledge instruction at an approved training organisation; and (3) 5 hours of dual instrument instruction time; and (4) A proficiency check with an instructor who holds the SCFR.</p> <p>(b) The privileges of the SCFR may not be exercised in a TMG.</p> <p>(c) The SCFR shall be valid for a period of 24 months. For revalidation and renewal, the applicant shall comply with the requirement in (a) (4) above.</p> | |

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| 4596 | B. Draft Opinion Part-FCL - Subpart I: Additional Ratings - FCL.800 Aerobatic rating | 42 | <p>FCL.800 Aerobatic rating (b)</p> <p>Comment: The requirement for 5 hours of dual aerobatic instruction time is too stringent. Particularly in gliding, this requirement is almost impossible to fulfil, since the time available for aerobatic training after release is mostly less than 5 minutes per individual flight. Specifying training in terms of hours is thus quite inappropriate for sailplanes. For sailplanes, the number of instructional aerobatic flights is a more meaningful figure. Experience of many decades of glider aerobatics has shown that, on average, 7 to 10 flights of dual instruction are needed for an average pilot to perform aerobatic flights satisfactorily and safely under supervision. In addition, training flights under supervision of a flight instructor should be possible to allow the use of a single-seater. EGU believes that the rating should be issued after a check flight with an instructor who holds the rating.</p> <p>EGU Proposal:</p> <p>1. FCL.800 (b) (3) to read: 5 hours of dual aerobatic instruction time (or, for sailplanes, 20 aerobatic flights which are either dual instruction or supervised solo) Add a further paragraph (4) (sailplanes only) a check flight with an instructor who holds the rating., 4.1.(S)</p> | |
| 4597 | B. Draft Opinion Part-FCL - Subpart I: Additional Ratings - FCL.805 Sailplane towing and banner towing ratings | 42 | <p>FCL 805 (b) (1)</p> <p>Applicants for a towing rating shall have completed 1) at least ... 100hours of flight time as pilot in command for the sailplane towing rating. At least 40 of these hours shall be in aeroplanes in the activity is to be carried out in aeroplanes, or in touring motor gliders, if the activity is to be carried out in touring motor gliders</p> <p>Comment EGU believes that this requirement is too stringent and that not more than a total of 75 hours as pilot in command should be required with at least 30 hours having been flown in aeroplanes. This is how it worked for many years in Germany and since there was no safety case there is no reason for tightening the rule.</p> | |

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| | | | <p>EGU Proposal</p> <p>1 at least ... 75 hours of flight time as pilot in command for the sailplane towing rating. At least 30 of these hours shall be in aeroplanes in the activity is to be carried out in aeroplanes, or in touring motor gliders, if the activity is to be carried out in touring motor gliders</p> | |
| 4600 | <p>B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.905.LAFI LAFI - Privileges and conditions</p> | 47 | <p>FCL.905. LAFI</p> <p>Comment:</p> <p>The proposals identify that the privileges of a light aircraft flight instructor (LAFI) are to conduct flight instruction for the issue, revalidation or renewal of an LPL but not an SPL. The logic of prohibiting a LAFI(S) from instructing for the issue of an SPL is understood, but the proposal takes this logic too far. In particular:</p> <ul style="list-style-type: none"> • The flight instruction specified for LPL(S) and SPL are identical (AMC to FCL.110.S and to FCL.210.S) • The skill tests specified for LPL(S) and SPL are identical (AMC No1 to FCL.125 and to FCL.235) • LAFI(S) and FI(S) have identical pre-requisites for their training courses (FCL.915.LAFI (d) & FCL.915.FI (f)) • LAFI(S) and FI(S) undergo identical training courses (FCL.930.LAFI (b)(1) and (b)(2)(i) & FCL,930.FI (b)(1)(ii) and (b)(2)(iii)) • LAFI(S) and FI(S) restricted privileges are identical (FCL.910.LAFI & FCL.910.FI) • LPL(S) and SPL recency requirements are identical (FCL.230.S) <p>There is, thus, no reason identified in the proposal why a LAFI(S) should not instruct for SPL, or why an FE LPL(S) should not examine for SPL.</p> <p>For the proposed rules not to allow a LAFI(S) to instruct for the SPL would cause unjustified and serious logistical restrictions in gliding clubs - which are primarily run by volunteers - without any discernable safety case.</p> <p>During the early part of training, when a pupil has not yet gone solo and so does not require a medical certificate, she or he may not even have decided what type of licence s/he wishes to train for. Requiring an arbitrary choice between identical</p> | |

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| | | | <p>instructors makes no sense!</p> <p>EGU Proposal:</p> <p>FCL.905.LAFI (b) a LPL (1) For sailplanes only, where instructor standards and flying training requirements are identical, a LAFI(S) may instruct for the issue, revalidation or renewal of an SPL.</p> <p>FCL.1005.FE:(Page 66) (g) (1) skill tests for the issue of the LPL(S) and, for sailplanes only, where instructor standards and flying training requirements are identical, skill tests for the issue of the SPL.</p> <p>EGU Alternative proposal: If, however, EASA should consider that it is legally forced to continue to pursue the current proposal, an amendment to FCL.210.S is proposed:</p> <p>FCL.210.S b) Applicants for an SPL who have met all the requirements for the issue of an LPL(S) shall be fully credited towards the requirements in (a), subject to the applicant meeting the SPL medical requirements.</p> | |
| 4601 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.905.LAFI LAFI - Privileges and conditions | 47 | <p>FCL.905.LAFI (f) (1) in the case of a LAFI for sailplanes or balloons at least 50 hours of instruction in the appropriate aircraft category;</p> <p>Comment: Number of launches is missing</p> <p>EGU Proposal: 1) in the case of a LAFI for sailplanes or balloons, at least 50 hours of instruction (or 150 launches for a LAFI(S)) in the appropriate aircraft category;</p> | |
| 4602 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements | 47 | <p>FCL.910.LAFI (b) 3) "In the case of a LAFI for sailplanes, at least 15 hours or 45 launches of flight instruction covering the full training syllabus for the issuance of the LPL for sailplanes"</p> <p>Comment:</p> | |

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| | for the light aircraft flight instructor - FCL.910.LAFI LAFI - Restricted privileges | | <p>Why are LAFI for sailplanes required to cover the full syllabus whereas LAFI for aeroplanes and helicopters are not? This additional requirement should be removed.</p> <p>EGU Proposal: 3) "In the case of a LAFI for sailplanes, at least 15 hours or 45 launches of flight instruction"</p> | |
| 4603 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor - FCL.940.LAFI LAFI - Revalidation and renewal | 49 | <p>FCL.940.LAFI (a) (ii) In the case of a LAFI for sailplanes, 30 hours or 60 take offs of flight instruction in sailplanes, powered sailplanes or TMG as LAFI, FI or as examiner during the period of validity of the certificate, including at least 10 hours or 20 take offs of flight instruction within 12 months preceding the expiry date of the certificate"</p> <p>Comment: The 10 hours of flight instruction required within 12 months preceding this expiry of the certificate are over-burdensome. In gliding, most instructors are volunteers and professional or family constraints may cause a temporary decrease in their activity. However, giving less than 10 hours flight instruction during the preceding 12 months does not result in a loss of proficiency especially considering that the 30 hours for the three previous years are required on a rolling basis. If the constraints set on our instructors are constantly increased, there is a risk of losing more and more of them!</p> <p>EGU Proposal: (ii) In the case of a LAFI for sailplanes, 30 hours or 60 take offs of flight instruction in sailplanes, powered sailplanes or TMG as LAFI, FI or as examiner during the period of validity of the certificate.</p> | |
| 4606 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - | 49 - 51 | <p>FCL.905.FI (g) An aerobatic rating, provided that the FI holds such a rating and has completed 20 hours of experience in aerobatic flying</p> <p>COMMENT: Specifying training in terms of hours is quite inappropriate for sailplanes (see comment on FCL 800). For sailplanes, the number of aerobatic flights</p> | |

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| | FCL.905.FI FI - Privileges and conditions | | <p>is a more meaningful figure. Requiring 60 aerobatic flights for FI(S) would be more reasonable</p> <p>EGU Proposal: An aerobatic rating, provided that the FI holds such a rating and has completed 20 hours of experience in aerobatic flying (or 60 aerobatic flights for glider aerobatics)</p> <p>Note: there is no similar requirement for a LAFI(S)...</p> | |
| 4607 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.905.FI FI - Privileges and conditions | 49 - 51 | <p>FCL.905.FI (J) (i) in the case of a FI(S) or FI(B), at least 50 hours of instruction in the appropriate aircraft category;</p> <p>Comment: Number of launches is missing</p> <p>EGU Proposal: (j) in the case of a FI(S) or FI(B), at least 50 hours of instruction (or 150 launches for a FI(S)) in the appropriate aircraft category;</p> | |
| 4609 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific requirements for the flight instructor - FCL.910.FI FI - Restricted privileges | 51 | <p>FCL.910.FI(c) (3) "For FI(As), FI(S) and FI(B) LAFI 15 hours or 50 take offs flight instruction covering the full training syllabus for the issuance of the a PPL (As), SPL or BPL in the appropriate aircraft category."</p> <p>Comment: Why are LAFI for sailplanes required to cover the full syllabus whereas LAFI for aeroplanes and helicopters are not? This additional requirement should be removed.</p> <p>EGU Proposal: (3) "For FI(As), FI(S) and FI(B) LAFI, 15 hours or 50 take offs flight instruction covering the full training syllabus for the issuance of a PPL (As), SPL or BPL in the appropriate aircraft category."</p> | |
| 4610 | B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 3: Specific | 52 - 53 | <p>FCL.940.FI (a) (1) (iii) (iii) 30 hours or 60 take offs of flight instruction in sailplanes, powered sailplanes or TMG as FI, LAFI or as examiner during the period of validity of the certificate, including at least 10 hours or 20 take offs of flight instruction within 12 months preceding the</p> | |

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| | requirements for the flight instructor - FCL.940.FI FI - Revalidation and renewal | | <p>expiry date of the certificate"</p> <p>Comment: Same comment as for FCL.940.LAFI (a) page 49</p> <p>EGU Proposal: (iii) In the case of an FI(S), at least 30 hours or 60 take offs of flight instruction in sailplanes, powered sailplanes or TMG as LAFI, FI or as examiner during the period of validity of the certificate.</p> | |
| 4612 | B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC to FCL.115 and FCL.120 - Syllabus of theoretical knowledge for the LPL - II. Additional subjects for each category - II.C. Sailplanes | 193 - 194 | <p>AMC TO FCL.115 and FCL.120 SYLLABUS OF THEORETICAL KNOWLEDGE FOR THE LPL II.C. SAILPLANES 6. OPERATIONAL PROCEDURES - SAILPLANE 6.6. SPECIAL OPERATIONAL PROCEDURES AND HAZARDS</p> <p>Comment There are procedures and hazards relevant to sailplane flying and operations that differ from those experienced in aeroplanes.</p> <p>EGU Proposal: 6.6. Relevant operational procedures and hazards</p> | |
| 4614 | B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC No 1 to FCL.125 and to FCL.235 - Contents of the skill test for the issue of a LPL(S) and of an SPL | 204 - 206 | <p>p206 AMC No1 to FCL.125 and to FCL.235 Contents of the skill test for the issue of a LPL(S) and of an SPL SECTION 2 LAUNCH METHOD SECTION 2(A)c - delete the word 'simulate' as this is not needed.</p> <p>SECTION 3 GENERAL AIRWORK a) Maintain straight and level flight; attitude</p> <p>Comment: Level flight is not appropriate for sailplanes</p> <p>EGU Proposal: a Maintain straight flight; attitude</p> <p>Section 3</p> | |

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| | | | <p>Comment: There is no proposed requirement to test for local area navigation. This is a critical skill.</p> <p>EGU Proposal: add: h) Local Area Navigation and awareness: Maintain appropriate awareness and maintenance of location, particularly with respect to local airspace and traffic requirements</p> | |
| 4615 | B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC No 1 to FCL.125 and to FCL.235 - Contents of the skill test for the issue of a LPL(S) and of an SPL | 204 - 206 | <p>Page 205 AMC 1 to FCL.125 and FCL.235 Contents of the skill test for the issue of a LPL(S) and of an SPL NPA Proposal 2. Checks should be completed in accordance with the flight manual and/or the authorised check list</p> <p>Comment: Local circumstances may require checklist items in addition to those specified by the manufacturer.</p> <p>EGU Proposal 2. Pre-flight service ability checks should be carried out in accordance with the flight manual or the servicing schedule. Pre- flight vital actions should be carried out as appropriate, but must include the minimum described in the flight manual.</p> | |
| 4616 | B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC to FCL.110.S and to FCL.210.S - Flight instruction for the leisure pilot (sailplanes) and the sailplane pilot | 241 - 246 | <p>Exercise Numbering</p> <p>Page 242 to 246 AMC to FCL.110.S and to FCL.210.S FLIGHT INSTRUCTION FOR THE LEISURE PILOT (SAILPLANES) AND THE SAILPLANE PILOT LICENCE & Pages 440 & 441 AMC TO FCL.930.LAFI Light Aircraft Flight Instructor (LAFI) training course PART 2 C. Sailplanes</p> <p>Comment: The exercise numbers do not match</p> | |

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| | licence (SPL) | | | |
| 4619 | B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.800 - Aerobatic Rating - Theoretical knowledge and flying training | 385 - 386 | <p>AMC to FCL 800</p> <p>Comment: The exercises in this part of the AMC are drawn from a power flying background and are, in many cases, not appropriate for sailplanes. We suggest an improved text which is more appropriate to sailplane pilots wanting to learn basic aerobatics safely.</p> <p>EGU Proposal: Title sentence to read: Aerobatic Rating - Theoretical knowledge, flying training, and sailplane proficiency check Additional paragraph: 3(S) Sailplanes only. Contents of the proficiency check for the issue of an aerobatic rating. The applicant should demonstrate the ability to fly, safely, the manoeuvres specified in 4.1(S) in a linked sequence:</p> <p>FLYING TRAINING Add two paragraphs: 4.(S) The exercises in the aerobatic flying training syllabus specified in 4.1(S) must be taught, and practised until the student is safe and competent, in a sailplane which permits these manoeuvres. The holder of an aerobatic rating may not perform any other manoeuvre unless s/he has satisfied a flight instructor that s/he is competent to do so. 4.1(S)</p> <ul style="list-style-type: none"> - 45deg climbing and diving lines - Chandelle - Loop - 2g turn <p>Note: we are satisfied with the Theoretical Knowledge and Confidence manoeuvre requirements.</p> | |
| 4620 | B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.800 - Aerobatic | 385 - 386 | <p>AMC FCL.800 Aerobatic rating (b)</p> <p>Comment: As the approved training organisation shall have responsibility for evaluating the satisfactory completion of the training by the applicant, it is an unnecessary additional requirement for anyone else to perform the endorsement of the licence. EGU interprets, that in this context, the competent authority is meant.</p> | |

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| | Rating – Theoretical knowledge and flying training | | <p>EGU Proposal: The licence endorsement for the successful completion of aerobatic training shall be performed by the responsible, approved training organisation.</p> <p>Justification: The proposed procedure avoids additional bureaucratic and financial burden.</p> | |
| 4622 | B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.850 - Towing Rating – Theoretical knowledge and flying training | 386 - 388 | <p>AMC to FCL 850 Towing 3.1 - - "Specific sailplane towing safety procedures"</p> <p>Comment: This wording might result in tow pilots being qualified to tow certain sailplane types only. This is completely unnecessary and, in any case, would be unmanageable. Remove the word specific.</p> <p>EGU Proposal: Revised wording leaving out the word 'specific': - - Sailplane towing safety procedures</p> | |
| 4624 | B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes | 440 - 458 | <p>Page 442 EXERCISE 2 - PROCEDURE IN THE EVENT OF EMERGENCIES BRIEFING - explain the procedure for landing with a parachute...etc</p> <p>Comment: This would require access to a qualified parachute instructor.</p> <p>EGU Proposal: - explain how to obtain guidance for landing with a parachute...etc</p> | |
| 4627 | B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - | 440 - 458 | <p>Page 444 NPA Proposal Exercise 6 - BANKING AT MODERATE ANGLE - COORDINATION</p> <p>Comment: Exercise name is misleading.</p> | |

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| | Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes | | <p>EGU Proposal</p> <p>Exercise title should be: Exercise 6 - CO-ORDINATED ROLLING TO AND FROM MODERATE ANGLES OF BANK</p> <p>Throughout</p> <p>References to 'straight and level flight' should be replaced with 'straight flight'</p> <p>EGU Proposal</p> <p>AIR EXERCISE</p> <p>...</p> <p>- rolling to a moderate angle of bank (20 to 30°) and returning to straight flight</p> | |
| 4628 | B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes | 440 - 458 | <p>AMC to FCL.930.LAFI</p> <p>Light Aircraft Flight Instructor (LAFI) training course</p> <p>C. Sailplanes</p> <p>Comments:</p> <p>There is a mis-match between the list, on page 440/1:</p> <p>LONG BRIEFINGS AND AIR EXERCISES</p> <p>and the note on page 452:</p> <p>EXERCISE 13 - SOARING TECHNIQUES:</p> <p>"NOTE: If the weather conditions during the instructor training do not allow the practical training of soaring techniques, all items of the air exercises have to be discussed and explained during a long briefing exercise only."</p> <p>EGU Proposal</p> <p>The list on page 440/1 should read:</p> <p>13 Soaring Techniques (if applicable, during training and, if possible, at training site)</p> <p>13A Thermalling</p> <p>13B Ridge flying</p> <p>13C Wave flying</p> | |