

### **EGU Comments to the CRD on Licensing NPA 2008-17b**

European Gliding Union (EGU) represents about 70000 glider pilots of 27 European member associations. As it is not possible to add the comments to the single subjects of the documents, the comments to the mentioned CRD are listed below with the related articles and clauses.

First of all, EGU recognized that EASA remarkably edited the proposal of NPA 2008-17 and overall a clear improvement of the proposed regulation into an appropriate and good rule is appreciated. However, in some single points, we have to make some comments and explanations.

#### **FCL.040 Exercise of the privilege of the licence**

EGU believes that the validity period of a licence should be better defined.

It should be clearly specified that the licence is has unlimited validity as long as the pilot fulfils the recency requirements and holds a valid medical certificate if required.

Furthermore if the licence should be re-issued every 5 years as stated in NPA 2008-22 on Authority and Organisation Requirements, this should also be mentioned here, although such a rule is not supported by EGU.

#### **FCL.045 Obligation to carry and present documents**

For those licences, in which a rolling time period is defined to fulfill the recency requirements, the bullet (c) is at least for gliding not logic, as only the flight time record allows to declare a licence valid. For that, the regulation should only require to present the complete set of paperwork in an acceptable time, meaning that the pilots have to provide the documents at the airfield they fly, meaning the lived situation on most of the airfields that the documents are stored properly as for local flights it is not necessary to have these documents in the aircraft.

To (d2): This para requires the student pilot to carry the authorization of the flight instructor for all solo flights. For clarification it should be mentioned that only a written authorization is needed for cross country flying, otherwise every single traffic pattern flight would require such a written authorization. As in gliding most of the communication and tasks are given to the student orally, this might be misunderstood by the user.

To require for every flight a written authorization would not reflect the lived situation and a decreased oral communication replaced by written documents would induce a safety risk.

#### **FCL.050 + AMC 1 TO FCL 0.50 Recording Flight time**

In their comment to the NPA 2008-17 the EGU proposed to create a practical logbook adapted to gliding to avoid unnecessary burden for glider pilots.

Unfortunately, this proposal has not been taken into account and such a logbook is still missing.

The EGU therefore proposes again to add an AMC with such a logbook (see attachment).

#### **FCL.110 LAPL — Crediting for the same aircraft category**

In FCL.110 the requirement that applicants for a LAPL who hold another licence have to pass a skill test for a LAPL in the respective category of aircraft is not applicable for pilots who hold a PPL or SPL and have not the possibility to maintain their licence due to medical reasons. They only have to get the respective medical to fulfil the requirements of a LAPL. All other requirements for LAPL are identical or lower between these licences.

For these people a skill test is not appropriate as they probably fulfilled all other recency requirements concerning practical and theoretical skills.

A clarification by an explanatory additional wording is necessary and it clearly has to be stated that pilots who hold a more demanding licence are fully credited for the respective LAPL of the respective type of aircraft.

### **FCL.110.S LAPL(S) Experience Requirement and Crediting**

In a (4) a “Cross country flight of at least 100km under the supervision of an instructor” is required. This wording is not clear. Does this flight have to be performed solo or can it be done in a two seater with an instructor or are both alternatives possible?

If the flight has to be performed solo, an instructor is not able to supervise the whole flight properly? The supervision in this case is restricted to the preparation phase and the launch phase of the flight.

Major concern has EGU about the length of the required cross country flight. While a 100Km flight may be easily performed with a modern glider it is much more difficult to fly 100 km in a wooden glider like a K8 especially in some areas with poor thermal conditions.

As in the majority of the clubs, this requirement is fulfilled in glider with less aerodynamic quality, an increase of the size of the cross country flight compared to nowadays, where 50 km are sufficient, is not appropriate.

As alternative proposal, EGU would prefer the requirement existing nowadays in the German licence: 50 km flight solo or 100Km in a two seat glider with an instructor. Such rule gives an acceptable level of flexibility and defines clearly how the rule can be fulfilled.

In (b) Instead of limiting the number of hours which may be completed on a TMG, EGU would prefer a more positive definition requiring a minimum of 8 hours to be completed in a sailplane or powered sailplane (TMG excluded)

### **FCL.130.S. LAPL(S) Launch Methods**

In (a)(1) a clarification is needed: Are winch launching and car launching two separate launch methods? Since the operational requirements for both launch methods are the same it would make sense to have one single restriction for winch and car launching.

If the two restrictions would remain separate, there would need to be a suitably low requirement for a pilot with one of them removed to qualify for the other one.

### **FCL.915 Pre requisite for instructors**

In (b) 2) i), it is required that the instructor has “completed a minimum of 15 hours on the class or type of aircraft on which the instruction is to be given”. Since in gliding we have no classes (except for competition) we believe it would be more adequate to require that the instructor has “completed a minimum of 15 hours on the category of aircraft on which the instruction is to be given” in case of sailplanes.

### **FCL.930 LAFI/FI Training course**

According to (b) 2) the training course shall include 25 hours teaching and learning plus 30 hours theoretical knowledge. The EGU believes that a total of 55 theoretical instructional lessons are too high especially when compared to the 6 hours of dual flight instruction.

It may become very difficult to recruit candidates willing to become voluntary instructors if they have to follow a 55 hours class room training. As gliding is done in the majority on a voluntary basis, this has to be taken into serious consideration.

We propose that for b(2) (i) also cross crediting will be possible for the package ‘Teaching & learning’.

About the ‘Teaching & Learning’ package: we propose also a credit for those candidates who received these courses during their professional education as teacher.

It may become very difficult to recruit candidates who will to become voluntary instructors if they have to follow a 55 hours class room training.

(2) (iii) (B) for the LAFI for sailplanes providing training on TMGs, at least 6 hours of dual flight instruction on TMGs

EGU does not agree with this rule as it is not proportionate.

Up to now, the training for any of the instructors does include all teaching and learning techniques which are necessary to perform safe and proper training. As there is not clear to see which additional syllabus exclusive for TMG training shall be included into these 6 hours flight time and which benefit shall be created, EGU states that this regulation does only induce additional costs for the already voluntary acting instructor applicant in a non commercial surrounding.

Those competences necessary for training are already present as the individual has to show the respective rating and additional practical skills before entering an instructor training course.

### **FCL.1020 Examiners assessment of competence**

In Europe there are no gliders with more than two seats. Therefore it seems quite difficult "to demonstrate the competence to an inspector from the competent authority or a senior examiner specifically authorised to do so by the competent authority responsible for the examiner's certificate though the conduct in flight of a skill test, proficiency check or assessment of competence in the examiner role for which the privileges are sought". We think that an alternative procedure for gliding is needed. This procedure could be the inspector or the senior examiner acting the student to be tested.