

Title	Qualifications for flying in Instrument Meteorological Conditions
NPA Number	NPA 2011-16

UK Light Aircraft Association (mike.barnard@laa.uk.com) has placed **3** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
965	EXECUTIVE SUMMARY	2	<p>We are pleased to have the opportunity to provide comment on this NPA.</p> <p>We welcome the recommendations to make instrument qualification more readily accessible particularly for pilots who are not normally required in the course of their profession to hold such a rating. We endorse the view that increasing the percentage of such holders within the PPL population will improve safety and interoperability. We endorse the view that the present JAR-FCL IR structure is disproportionately complex, costly, and geared heavily toward commercial operation of high performance aircraft. We believe that that the proposed competency-based modular EIR and IR(A) and the training regime upon which they are based should be proportionate to the needs of the PPL, and any additional requirements associated with commercial operation and/or operation of high-performance aircraft should be appended to such relevant syllabi and ratings. We note that the ICAO-compliant FAA-IR provides a single basis for instrument flight for all classes of aircrew and aircraft.</p>	
968	A. Explanatory Note - III. Overview of the changes proposed in this NPA	6 - 13	<p>Paragraph No: Section 2.2 - Possible restrictions to privileges Comment: We agree with the proposal not to restrict the privileges of the IR(A) to certain aeroplane categories. Justification: The inclusion of identified additional theory items in the class and type rating theory as set out in Part-FCL or as mandatory items (also for the VFR rated pilots) in the HPA course provide a proportionate separation between the skills required for IFR operation and the additional skills required for commercial operation and/or operation of complex or High Performance Aircraft. Proposed Text: None</p> <p>Paragraph No: Section 2.3 - Learning Objectives Comment: We have carefully studied the AMCs containing the tables with the LOs for the seven</p>	

Cmt#	Segment description	Page	Comment	Attachments
			<p>required subjects and are generally content with the proposed content but would recommend that the LOs noted below be removed from the IR(A) list.</p> <p>We offer no comments on whether some of the deletions proposed for the competency-based modular route should be taken over also for the existing IR other than to endorse the proposal that LOs aligned principally to the operation of High Performance Aircraft should be removed from the IR syllabus.</p> <p>We offer no comments on content of the syllabus as published in Part-FCL for the HPA course.</p> <p>Justification:</p> <p>010 04 02 02 Not relevant to PPL IR operation.</p> <p>010 09 03 00 Not relevant to IFR operation.</p> <p>010 09 04 00 Not relevant to IFR operation.</p> <p>062 05 04 06 Not relevant to PPL IR operation of non-complex aircraft.</p> <p>Proposed Text: AMC1 FCL.615 - Remove as noted above.</p> <p>Paragraph No: Section 2.4 – Flight instruction</p> <p>Comment: We are of the opinion that a specific training route for a competency-based course towards a multi-engine IR(A) is not required.</p> <p>Justification: The proposed upgrade course of 5 hours in an ATO for the IR(A) holder who also holds a multi-engine class or type rating and wishes to obtain a multi-engine IR(A) for the first time would appear to provide a proportionate degree of additional training in the case of asymmetric operation of an aeroplane under IFR.</p> <p>Proposed Text: None</p> <p>Paragraph No: Section 4 - Changes to be addressed in Part-FCL</p> <p>Comment: We are of the opinion that the LOs for the other IR routes should be amended as well.</p> <p>Justification: A single rationalised IR(A) should form the basis for IFR operation of all aeroplane classes and types, with specific aspects associated with IFR operation of complex or high performance aircraft being linked to such specific class and type ratings.</p> <p>Proposed Text: None</p>	
967	B. Draft Opinion and Decision - I. Draft	16 - 22	<p>Paragraph No: FCL825 (a) (1)</p> <p>Comment: We propose that where the holder of an EIR is also the holder of a night qualification</p>	

Cmt#	Segment description	Page	Comment	Attachments
	Opinion		<p>for that class or type of aircraft, the EIR should not be restricted to day operation.</p> <p>Justification: The holder of an EIR has demonstrated a competence to safely operate an aircraft by sole reference to instruments and hence it would be disproportionate to restrict the holder of a night qualification from exercising night privileges under en-route IFR where he also holds an EIR. Removing the 'by day' restriction does not absolve the holder from requiring a night qualification in order to exercise his license privileges at night.</p> <p>Proposed Text: FCL825 (a) (1) Delete the words 'by day'</p> <p>Paragraph No: Various</p> <p>Comment: We are pleased to note that the training regime follows ALARP (As Low As Reasonably Practical) principles in respect of training course approvals and the provision of training from independent IRI(A) or FI(A) holders; we believe this to be in the best interests of the principal Terms of Reference, that to maximise the uptake of Instrument qualification by private pilots.</p> <p>Justification: The Learning Objectives (LOs) for both the competency-based modular EIR and IR(A) are sufficiently well stated and the requirement for defined training time and skills testing at an ATO provides sufficient oversight proportionate to the needs of the private pilot.</p> <p>Proposed Text: None</p> <p>Paragraph No: Sections 1.3 and 2.5 - Theoretical knowledge instruction and examination</p> <p>Comment: We believe it is inappropriate to require defined time minima either for the theoretical knowledge (TK) aspects, or for defined minimum duration of classroom teaching within an ATO for the competency-based EIR and IR(A).</p> <p>Justification: The competency-based approach will ensure that only those candidates who demonstrate sufficient TK competency will pass the TK examinations. Where a candidate is able to demonstrate competency within a shorter time than proposed, whether by personal ability or prior knowledge, it would be disproportionate to require additional unnecessary tuition. To do so would impose unnecessary time and cost burdens and may have the effect of reducing the potential uptake of instrument qualification amongst PPLs.</p> <p>Proposed Text: A.2.IR(A).5 Delete the words 'of at least 100</p>	

Cmt#	Segment description	Page	Comment	Attachments
			hours.'	