

Référence DGAC (Référence AESA)	Paragraphe AIRCREW concerné	Titre
DGAC : 2015-09-18- AIRCREW-AMOC FC N01 EASA :	Regulation (UE) n°1178/2011 Annex I Part FCL – FCL 740.A (b) (1) (ii)	Refresher training for the revalidation of a single-engine piston aeroplane or a TMG class rating

DGAC France 18 September 2015

In accordance with ARA.GEN 120 (e) (Means of compliance) DGAC France proposes an alternative means of compliance to:

Regulation reference: Regulation (UE) n°1178/2011 Annex I Part FCL – FCL 740.A (b) (1) (ii)
Subject: Refresher training for the revalidation of a single-engine piston aeroplane or a TMG class rating
Summary: Regulation (EU) n°445/2015 amended regulation (EU) n°1178/2011 and in particular its paragraph FCL 740.A (b) (1) (ii). Before regulation (EU) n°445/2015, for revalidation of a single-engine piston aeroplane or a TMG class rating, the regulation was requiring, among the others conditions, a “training flight”: <i>“a training flight of at least 1 hour with a flight instructor (FI) or a class rating instructor (CRI). Applicants shall be exempted from this flight if they have passed a class or type rating proficiency check or skill test in any other class or type of aeroplane”.</i> After regulation (EU) n°445/2015, for revalidation of a single-engine piston aeroplane or a TMG class rating, the regulation requires now, among the others conditions, a “refresher training”: <i>“refresher training of at least 1 hour of total flight time with a flight instructor (FI) or a class rating instructor (CRI). Applicants shall be exempted from this refresher training if they have passed a class or type rating proficiency check, skill test or assessment of competence in any other class or type of aeroplane”.</i> The new term “refresher training” has been replacing “training flight” without any AMC or GM materials in order to clarify the intention of the amendment. In addition it should be noted that the term “refresher training” is commonly used in regulation (EU) n°1178/2011 when referring to renewals and not revalidations. For example FCL.625 (c) (1) IR renewal, FCL.740 (b) (1) Class and type ratings renewal, FCL.825 (g) (4) (i) EIR renewal. It should be stressed that in the case of a revalidation the candidate is still considered competent to operate a single-engine piston aeroplane or a TMG (his/her class rating is still valid). Therefore the correct term that should have been issued is “recurrent training” and not “refresher training” that is

more referring to a candidate whose rating has expired.

This situation has led to some interpretation issues for the Authority, the General Aviation community and in particular for a flight instructor (FI) or a class rating instructor (CRI) who are supposed to perform those “refresher training”.

In order to clarify the situation DGAC Alt MOC proposes to add an additional guidance in order to define the content of the “refresher training”.

For this purpose DGAC has reproduced the new “**AMC1 FCL.740.A(b)(1)(ii) Revalidation of class and type ratings**” that has been proposed in NPA 2014-29 (Doc B page 11/38). This new AMC specifies the contents of the training flight for the revalidation of a single-engine piston aeroplane or a TMG without putting additional burden on General Aviation pilots. This AMC aims at enhancing safety, providing guidance for instructors, and answering a safety recommendation.

Implementing rule:

FCL 740.A (b) (1) (ii) requires the applicant for a single-engine piston aeroplane or a TMG class rating revalidation to take a refresher training of at least 1 hour of total flight time with a flight instructor (FI) or a class rating instructor (CRI) within the 12 months preceding the expiry date of the rating.

Existing Acceptable Means of Compliance:

None

DGAC France Alternative Means of compliance:

AltMoC1 FCL 740.A (b) (1) (ii) – Revalidation of class and type ratings

Training flight items should be based on the exercise items of the proficiency check as deemed relevant by the instructor and depending on the experience of the candidate. The briefing should include a discussion on threat-and-error management with special emphasis on decision-making when encountering adverse meteorological conditions, unintentional Instrument Meteorological Conditions (IMCs) and navigation flight capabilities.

Assessment:

There is no existing AMC or GM to provide guidance for instructors who conduct the refresher training for the revalidation of a single-engine piston aeroplane or a TMG class rating.

The DGAC Alt MOC fills the gap by providing the required guidance.

This Alt MOC that has been proposed by NPA 2014-29 is assessed as being compliant with the general safety objectives of the regulation.