

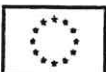


AltMoC Notification Form

Ref # [chrono/record num.]


Filled in by the Agency 2021-00043

1. Notifying competent authority (CA)	
1.1 Name of the CA	DGAC - France
1.2 AltMoC focal point	Title: <input checked="" type="checkbox"/> Mr <input type="checkbox"/> Ms
	First Name: Karine
	Name: GAY
	Job title: Head of Flight crew Training Department
1.3 Contact details of the AltMoC focal point	E-mail: Karine.gay@aviation-civile.gouv.fr
	Tel. No: +33 (0)1.58.09.40.26
2. Alternative means of compliance (AltMoC)	
2.1 Subject	Definition of glacier for the purpose of ski mountain rating
2.2 Regulatory reference	(EU) 1178/2011 & ED Decision 2011/016/R
2.3 Implementing Rule (IR) paragraph(s)	FCL.815
2.4 Agency acceptable means of compliance (AMC) available	Yes <input checked="" type="checkbox"/> Ref.: AMC2 FCL.815 (b)
	No <input type="checkbox"/>
2.5 AltMoC proposer	<input type="checkbox"/> Organisation
	Name of the organisation:
	Date when the AltMoC was approved by the CA:
	<input checked="" type="checkbox"/> Competent authority
Date when the AltMoC was made available to organisations and persons under its oversight:	
2.6 AltMoC based on an AltMoC from another CA	Yes <input type="checkbox"/> Name of the CA:
	No <input checked="" type="checkbox"/>
2.7 Summary of the AltMoC	"Glacier" is replaced by "site with no axis or boundaries clearly defined with visual clues"
2.8 Summary of the AltMoC assessment	A « glacier » is not specific and is considered as a surface (« altisurface ») like any other.

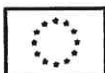




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	A landing area on a glacier is expected to have no axis or boundaries clearly defined with visual clues, so will be one of the surface stated in this AltMoc.
2.9 Attachments to the AltMoC notification form	Please tick in the boxes below to verify that you have attached all the required documentation depending on the AltMoC proposer/user.
AltMoC proposed by an organisation:	AltMoC used by a competent authority itself:
1) Full organisation's description of the AltMoC, which includes reasoning of the AltMoC <input type="checkbox"/>	1) Full description of the AltMoC, which includes reasoning of the AltMoC <input checked="" type="checkbox"/>
2) CA's evaluation of the AltMoC <input type="checkbox"/>	2) Assessment demonstrating that the IR(s) are met <input checked="" type="checkbox"/>
3) CA's signed statement that the AltMoC was assessed ¹ by the CA and it establishes compliance with the IR(s) <input type="checkbox"/>	3) Regulatory wording of the used AltMoC <input checked="" type="checkbox"/>
<p>Note: The Agency reserves its right to raise additional questions and request for the following AltMoC documentation in the context of Regulation (EU) No 628/2013 article 5:</p> <ul style="list-style-type: none"> • Relevant revisions to manuals/procedures introduced by an organisation or a competent authority, depending on the AltMoC proposer/user; and • Risk assessment of the AltMoC performed by an organisation demonstrating that an equivalent level of safety to that established by the Agency AMC is reached. 	
2.10 List of the attachments in addition to the above required if relevant	None
3. Information	
3.1 Other Member States have been informed about the organisation proposed AltMoC	Yes <input type="checkbox"/> How: No <input checked="" type="checkbox"/>
4. Date and signature	2 nov. 2021 A J J 17
This Notification should be sent by email to: European Aviation Safety Agency altmoc@easa.europa.eu NOTE: Every AltMoC notification should relate to one AltMoC only.	Completion Instructions  Completion Instructions Please double-click on the icon to access the completion instructions

¹ The CA's assessment also includes an evaluation of an AltMoC's risk assessment where relevant.



Regulation reference :

Regulation (UE) n°1178/2011 Annex I Part FCL – FCL.815 Mountain rating

Subject : Skill test and proficiency check for mountain rating ski or extension wheel to ski**Summary :**

AMC2 FCL.815 (b) requires a recognition, approach and landing on a glacier during a skill test or proficiency check for mountain rating ski (or extension from wheel to ski) :

« *During the flight test, two sites different from the departure airport should be used for recognition, approach, landing and take-off. For the mountain rating ski or the extension from wheel to ski, one of the two different sites should be a glacier.* »

A « glacier » has no specific definition in any EASA regulation, it should be considered as a « surface » requiring a mountain rating (French : « altisurface ») like any other.

The sole distinction made by EASA regulation for a surface is : cover with snow or not (FCL.815).

In the Pyrénées mountains, there is no glacier allowed for landing.

As a consequence, since the implementation of FCL.815 :

- No mountain rating ski skill test can be taken anymore in the Pyrénées, despite numerous snow landing sites, ski training schools and instructors available
- Qualified pilots are unable to renew or revalidate their mountain rating ski where they have always been used to fly

For those reasons, DGAC France propose an Alternative Means of Compliance for FCL.815 removing the requirement for a glacier recognition, approach and landing during a skill test or proficiency check for mountain rating ski or extension from wheel to ski.

Implementing rule :

FCL.815 (c) « skill test » requires that after the completion of the training, the applicant shall pass a skill test with an FE qualified for this purpose. The skill test shall contain: (1) a verbal examination of theoretical knowledge; (2) 6 landings on at least 2 different surfaces designated as requiring a mountain rating other than the surface of departure.

Existing Acceptable Means of compliance :

EASA AMC2 FCL.815

Request for DGAC France Alternative Means of compliance :**AltMoC1 FCL.815 Mountain rating****SKILL TEST AND PROFICIENCY CHECK**

The skill test for the issue or the proficiency check for the revalidation or renewal of a mountain rating should contain the following elements:

(a) oral examination

This part should be done before the flight and should cover all the relevant parts of the theoretical knowledge. At least one question for each of the following sections should be asked:

(1) specific equipment for a mountain flight (personal and aircraft);

(2) rules of the mountain flight.

If the oral examination reveals a lack in theoretical knowledge, the flight test should not be done and the skill test is failed.

(b) practical skill test

During the flight test, two sites different from the departure airport should be used for recognition, approach, landing and take-off. For the mountain rating ski or the extension from wheel to ski, **one of the two with no axis or boundaries clearly defined with visual clues.**

Assessment :

- Mountain pilots having passed skill tests and proficiency checks in the Pyrénées mountains (without glacier landing) have proven being as safe as any others.
- For French administration (« préfecture »), a « glacier » is not specific and is considered as a surface (« altisurface ») like any other.
- A landing area on a glacier is expected to have no axis or boundaries clearly defined with visual clues, so will be one of the surface stated in this AltMoc.