



(Enregistrement EASA)	Paragraphe AIRCREW concerné	Titre
(number 2018-00015)	Regulation UE n°1178/2011 Annex V- PART CC § CC.CCA.105	Validity of the Cabin Crew Attestation (CCA)

DGAC France April 18, 2018.

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 V- PART CC - § CC.CCA.105

Subject :

Validity of the Cabin Crew Attestation (CCA)

Summary of the AltMoC

This AltMoC aims at establishing conditions to render valid again cabin crew attestations (CCA), for those CCA holders who have not exercised the associated privileges during 60 months on at least one aircraft type.

Summary of the AltMoC assessment

According to CC.CCA.105 b), the CCA of such holders is no longer valid. Yet, it would be unnecessary and disproportionate to apply the provisions of CC.CCA.100 relating to the initial issue of the CCA to those CCA holders who have a previous experience as cabin crew.

Regulatory wording of the AltMoC

AltMoC to CC.CCA.105 b) – Validity of the cabin crew attestation

I. For those CCA holders who have not exercised the associated privileges during 60 months on at least one aircraft type, but who can demonstrate that they have previously acted as cabin crew for an aircraft operator compliant with regulation (EU) N°965/2012 amended or with regulation (EC) n°859/2008, the CCA may be rendered valid again based on the following provisions:

The holder of the CCA shall:

- a) undergo a refresher training course delivered by (or on behalf of) an aircraft operator compliant with regulation (EU) N°965/2012 amended; this refresher training course shall follow a program tailored to the previous experience of the cabin crew and derived from the program for the initial issue of a CCA prescribed by Annex II of the French order of 26 March 2013 *relating to the initial training for the issuance of a cabin crew attestation* (“arrêté du 26 mars 2013 *relatif à la formation initiale pour l’obtention du certificat de membre d’équipage de cabine*”);
- b) pass the examination following completion of this tailored course; this examination shall cover all the elements of the tailored course completed.

The process for customising the appropriate refresher training course and associated

examination shall be approved by the safety director of civil aviation.

II. For those CCA holders who have not exercised the associated privileges during 60 months on at least one aircraft type, and who have never acted as cabin crew, the CCA may be rendered valid again based on the following provisions:

The holder of the CCA shall fulfil all the provisions of CC.TRA.220.

AltMoC reasoning and assessment (i.e demonstrating that the IR is met)

REASONING

Conditions to apply to CCA which are no longer valid are not described in regulation (EU) N°1178/2011. CC.CCA.105 stipulates that CCA is issued with unlimited duration and describes the conditions according to which the CCA is no longer valid (suspended/revoked by the authority or privileges not exercised in 60 months). Yet, the need to render valid again CCA which have been issued will undoubtedly arise. Therefore, the process should be described. This is the point of the AltMoC proposed by DSAC.

The current absence of any such dispositions in regulation (EU) N°1178/2011 imply that, once a CCA is no longer valid, the provisions which should be applied to render it valid again are those prescribed by CC.CCA.100 (process) and CC.TRA.220 (contents of training and examination) for the initial issue of the CCA (it would thus mean issuance of a new CCA to the holder of a CCA which is no longer valid). Such provisions are indeed appropriate in most cases, for instance for those persons who have undergone the initial training and examination, and who have since not once exercised the privileges associated to the attestations delivered. It would be clearer if this interpretation was clarified. The AltMoC proposed by DSAC aims at this clarification.

However, some persons may have exercised the privileges associated to their CCA and may have temporarily interrupted their carrier as cabin crew for a period exceeding 60 months (e.g. due to a long period of unemployment, or to fulfil a personal project such as raising children, etc.). For such persons, who often have a relatively long experience as cabin crew, requiring that they complete again the full initial training course and examination as per CC.TRA.220 would:

- be disproportionate, as the issue to address through training and examination of such persons to render valid again their CCA is to re-establish their proficiency based on their knowledge and previous experience (albeit not a recent one), including the recurrent training provided regularly by aircraft operators;
- be unrealistic/inoperative/deterrent, as it would require that the persons concerned complete the training in an approved training centre; indeed, while the order of 26 March 2013 mentioned in the AltMoC proposed by DSAC allows for aircraft operators to deliver initial training for issuance of CCA, in reality, in France, all initial training for CCA is delivered by approved training centres only and not by any aircraft operator; the “going back to school” effect should not be underestimated;
- have a non-negligible economic impact on the aircraft operators (duration of the course, time away from flight duties, redundant training, etc.), whereas the civil aviation market is on the rebound and European operators are trying to recover from the economic crisis, agility being a key to their performance.

ASSESSMENT

There are no AMCs to CC.CCA.105. The AltMoC proposed by DSAC neither adds to nor withdraws from the provisions of CC.CCA.105. It just aims at clarifying the means by which a CCA which is no longer valid may be rendered valid again in some specific cases.

The AltMoC proposed by DSAC focuses mainly on one category of cabin crew: those who can demonstrate previous experience acquired in a European aircraft operator (i.e. acquired in an operator compliant with regulation (EU) N°965/2012 amended or with regulation (EC) n°859/2008) and who have interrupted their carrier. It aims at ensuring that the training course and examination necessary to revalidate a CCA which is no longer valid is adapted to the specific needs of each cabin crew concerned. The specific approval by DSAC of the process presented by the aircraft operator for customising the appropriate refresher training course and associated examination shall ensure that suitable training is provided in all cases, in such non nominal circumstances. DSAC will assess this process according to the principles described in ARA.CC.200. Effectively, through its assessment and approval of the process submitted by the aircraft operator, DSAC ensures that all the conditions necessary to exercise the privileges associated to the CCA have been restored.

For CCA holders with no practical experience whatsoever, the means to render the CCA valid again is obviously to require that the CCA holder undergoes the full initial training course and examination as per CC.TRA.220. This case may currently be relatively frequent in France. Indeed, all cabin crew employed by aircraft operators in France already hold a CCA, issued by DSAC after training delivered by approved training organisations and examination organised by DSAC. This system does not limit the number of applicants to the strict number of cabin crew ready to be employed by aircraft operators. As a consequence, some CCA holders may not exercise immediately the privileges associated to their CCA. In the past, some CCA holders may have waited a few years before being employed by an aircraft operator.