

# Civil Aviation Authority INFORMATION NOTICE

Number: IN-2013/118



**Issued: 24 July 2013** 

# Guidance for ATOs conducting PPL(A), PPL(H), LAPL(A) or LAPL(H) courses, for which there are new Theoretical Knowledge (TK) requirements

#### This Information Notice contains information that is for guidance and/or awareness.

Recipients are asked to ensure that this IN is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

| Applicability:                 |   |
|--------------------------------|---|
| Aerodromes:                    |   |
| Air Traffic:                   |   |
| Airspace:                      |   |
| Airworthiness:                 |   |
| Flight Operations:             | General Aviation Pilots   |
| Licensed/Unlicensed Personnel: | All Approved Training Organisations; those Registered Training Facilities applying for ATO status, All Pilots |

#### 1. Introduction

- 1.1 This Information Notice provides guidance to those ATOs seeking approval to provide PPL(A), PPL(H), LAPL(A) or LAPL(H), Flight and Ground instruction, and highlights the associated EASA Part-FCL Theoretical Knowledge (TK) instruction requirements.
- 1.2 FCL.115 of Part-FCL states: "Applicants for a LAPL shall complete a training course within an ATO. The course shall include TK and flight instruction appropriate to the privileges given." FCL.210 of Part-FCL states: "Applicants for a BPL, SPL or PPL shall complete a training course at an ATO. The course shall include TK and flight instruction appropriate to the privileges given." The provision of PPL(A); PPL(H); LAPL(A) and LAPL(H) instruction by an ATO must therefore include both the TK and flight instruction.
- 1.3 An ATO providing PPL(A), PPL(H), LAPL(A) or LAPL(H) courses may consider contracting the TK instructional element from another organisation. In such cases, compliance with ORA.GEN.205 and AMC1 ORA.GEN.205 "Contracted activities" will be required.

#### 2. Scope

2.1 In AMC 1 FCL 210; FCL 215 to Part-FCL, EASA states that for the PPL (A) and PPL (H)\_: "An approved course shall comprise at least 100 hours of theoretical knowledge instruction. This TK instruction provided by the ATO should include a certain element of formal classroom work but may include also such facilities as: interactive video, slide or tape presentation, computer-based training and other media distance learning courses."

- 2.2 Prior to implementation of EASA Part-FCL legislation there was no minimum time requirement for PPL(A) or PPL(H) TK instruction. The figure of 100 hours of TK instruction is therefore new and should be noted by ATOs wishing to provide TK instruction for the PPL(A) or PPL(H). Additionally:
- 2.3 AMC1 FCL.115; FCL120 to Part-FCL in paragraph b) confirms that the syllabi for the TK instruction and examination for the PPL(A) and PPL(H), which is defined in AMC1 FCL 210 and FCL 215 to Part-FCL, should also be used for the LAPL(A) and the LAPL(H) respectively.
- 2.4 Additionally, Part-FCL, Appendix 1, point 1.3 states that for the issue of a PPL(A), PPL(H), SPL and BPL, the holder of a LAPL in the same category of aircraft shall be credited in full towards the TK instruction and examination requirements.
- 2.5 Consequently, the TK syllabi and examination requirements are the same for PPL(A) and LAPL(A) and the PPL(H) and LAPL(H) respectively, including the requirement for 100 hours of TK instruction.

## 3. Guidance and Approval process

- 3.1 Organisations already approved for flight or type rating training under JAR-FCL regulations or registered (registered training facilities, RTFs) with UK CAA for PPL(A) or PPL(H) training before 17 September 2012, have until 8 April 2014 for approved organisations and 8 April 2015 for registered facilities, to comply with the requirements of the EASA Aircrew regulation.
- 3.2 Organisations wishing to offer training for the LAPL(A) or LAPL(H) must be approved in accordance with the EASA Aircrew regulation.
- 3.3 The CAA position is that any ATO seeking approval to provide TK instruction for PPL(A), PPL(H), LAPL(A) and LAPL(H) courses shall address the following:
- 3.4 The ATO will provide the CAA (Licensing and Training Standards (L&TS) Approvals) with a proposal showing how compliance with AMC 1 FCL.210; FCL.215 to Part-FCL will be achieved, and in particular, the various delivery methods by which the TK instruction will be undertaken with the associated time allocations.
- 3.5 Whilst the Acceptable Means of Compliance (AMC) lists the various acceptable methods of TK delivery, it does not specify any division of hours between them.
- 3.6 As stated in AMC 1 FCL.210; FCL.215 to Part-FCL, the TK instruction given by the instructor to the student must include face to face time in a classroom and may additionally make use of: interactive video; slide or tape presentation; computer-based training and other media distance learning courses. The ATO may therefore propose using SKYPE and/or other voice and image-over-Internet services and these will be considered by L&TS Approvals, taking due account of the subject matter to be delivered.
- 3.7 The Authority recognises the benefits of the traditional, formal classroom environment where the instructor and student can interact directly. Consequently, the Authority will encourage usage of such a delivery method.
- 3.8 A portion of the TK course may be conducted as directed and monitored, student self-study.

- 3.9 Should an ATO wish to operate distance learning courses using services such as Skype (or other provider):
  - In any one subject class the number of students receiving the TK instruction should be appropriate for: the lecture subject; the method and the quality of delivery. In most cases, the number of students in the class should be as small as possible.
  - The TK instructor should be in the ATO classroom or other suitable venue, but within the confines of the ATO, such as a hangar, FSTD or workshop, for the conduct of the lesson. Facility requirements are confirmed in AMC2 ORA.GEN.215.
  - The Authority should be informed in advance of the first use of the method and additionally, be allowed access to lessons being delivered live to the student.
  - Both voice **and** image must be used simultaneously in order to deliver TK instruction.
  - The use of Skype cannot be considered as formal classroom work.
- 3.9.1 Guidance contained in Standards Document 55 advises that no more than 33% of the total CPL/ATPL TK course should be provided by Computer Based Training (CBT). However, whilst such a limit will not be applied to PPL(A), PPL(H), LAPL(A) and LAPL(H) TK delivery, any CBT element of a proposed PPL(A), PPL(H), LAPL(A) or LAPL(H) TK course would be considered carefully in conjunction with the rest of the course that may be provided by alternative methods.
- 3.9.2 A student may study any PPL(A), PPL(H), LAPL(A) or LAPL(H) TK subject, complete the required hours allocated to that subject in their ATOs training plan and then sit the appropriate subject exam. As for any licence application, compliance with FCL.025 of Part-FCL, "Theoretical knowledge examinations for the issue of licences" regarding the number of exam attempts/sittings and allowed time frame, will be required. The requirement to complete an approved course comprising at least 100 hours of TK instruction must be complied with before the final examination is attempted.
- 3.9.3 Additionally, AMC 1 FCL.210; FCL.215 states "the training organisation responsible for the training has to check if all the appropriate elements of the training course of TK instruction have been completed to a satisfactory standard before recommending the applicant for the examination"
- 3.9.4 In accordance with FCL.030 of Part-FCL "Practical Skill Test", the student must complete and pass all required TK instruction and TK examinations before attempting the skill test required for the grant of the PPL(A), PPL(H), LAPL(A) or LAPL(H).
- 4. ATOs approved, or seeking approval, to provide PPL(A), PPL(H), LAPL(A) or LAPL(H) courses
- 4.1 ATOs must maintain an appropriate Student training file, which will be subject to Authority inspection, confirming that each PPL(A), PPL(H), LAPL(A) or LAPL(H) student has complied with AMC 1 FCL.210; FCL.215 to Part-FCL; such evidence shall be contained in the Student training file as required by AMC1 ORA.ATO.120 (a) and (b) and ORA.ATO.120
- 4.2 Each ATO application will be reviewed and its compliance with AMC 1 FCL. 210; FCL.215 of Part-FCL determined.

## 5. Further Information

5.1 See the EASA and CAA websites at:

http://easa.europa.eu/home.php# and www.caa.co.uk

# 6. Queries

6.1 Applications, queries or requests for further guidance required as a result of this communication should be addressed to: <u>LTSAppovals@caa.co.uk</u>

# 7. Cancellation

7.1 This Information Notice shall remain in force until 31 July 2014 unless cancelled.