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<b>Title</b>	Amendments to Commission Regulation (EU) No 1178/2011 (the Aircrew Regulation) — Flight Examiner Manual: Module 8, Chapter 1 & Module 9, Chapter 1
<b>NPA Number</b>	NPA 2014-29 (C)(3)

**René Meier, Europe Air Sports** (r.meier@europe-air-sports.org) has placed **11** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
32	(General Comments)	0	<p>Europe Air Sports, particularly supported by its member organisations European Gliding Union, European Powered Flying Union, PPL/IR, held a workshop on the entire set of NPA-2014-29. Our comments also reflect positions of several national organisations as the Aero-Club of Switzerland, CNFAS France, the German Aero Club, the Norwegian Air Sports Federation (NLF).</p> <p>We thank the Agency for the preparation of this NPA.</p>	
4	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.1. Who may test	3	<p>Examiner Class Rating Chapter 1-Class ratings: Aeroplanes p 3/131</p> <p>We propose making a reference also to FE (not only to CRE) in paragraph 8.1.1.</p> <p>Rationale: The conduct of class rating tests is included in the FE privileges.</p>	
5	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.2. Conduct of test/check	3 - 4	<p>8.1.2 Conduct of test/check p 3/131</p> <p>Test scenario</p> <p>The wording in NPA 2014-29 (C)(3) paragraphs 8.1.2 (page 3) and 8.1.6 (page 61) still refer to skill test or proficiency check scenarios “developed and approved by the competent authority”.</p> <p>The FEM [NPA 2014-29 (C)(3)] should be aligned with the new wording proposed in Appendix 9 to NPA 2014-29 (A).</p> <p>Rationale:</p>	

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			This wording is not consistent with the amendment of Appendix 9 paragraph (6) as proposed in NPA 2014-29 (A) (page 172/253).	
7	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.5. Detailed testing/checking standards — SECTION 2: AIRWORK (VFR)	16 - 21	<p>Section 2: Airwork (VFR) p 16/131</p> <p>Under "SKILL" item (a), the remark into quotation marks "<i>solely by reference to instruments, if applicable to flight</i>": The remark should be deleted.</p> <p>Rationale: It is not consistent with the fact that the section is referring to VFR exercises.</p>	
9	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.5. Detailed testing/checking standards — SECTION 2: AIRWORK (VFR)	16 - 21	<p>2.3. Stalls and recovery p 18/131</p> <p>In section 2 paragraph 2.3 "Airwork (VFR)" (page 18/131) it is stated under "SKILL" point (d): "[...] and initiates recovery as directed by the examiner;".</p> <p>We suggest aligning the guidance above with the guidance defined in FEM for stall exercises in the case of a CPL test as mentioned in NPA 2014-29 (C)(1) paragraph 2.3.7 (e) (page 50/270) and in section 2 "General Airwork" / line "SKILL" (page 53/270).</p> <p>Rationale: The required measures are identical.</p>	
10	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.5. Detailed testing/checking standards — SECTION 3B:	29 - 38	<p>Section 3B: Instrument flight 3B.6 Objective p 36/131</p> <p>First sentence: We think "altitude indicature" must be replaced by "attitude indicator".</p> <p>Rationale: Correct attitude is the context.</p>	

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	INSTRUMENT FLIGHT			
11	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.5. Detailed testing/checking standards — SECTION 4: ARRIVALS AND LANDINGS	39 - 47	<p>4.6. Go-around from minimum height p 45/131</p> <p>There are references to "MPA" whereas NPA 2014 (C)(1) mentions that the module 8 deals only with SP aeroplane (excluding SP HPA complex aeroplanes). This is to clarify. "MPA" may be replaced by "MPO".</p> <p>Rationale: Consistency.</p>	
6	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.6. Pass/fail criteria	58 - 71	<p>Appendix 9 (6) Conduct of test/check p 61/131</p> <p>Test scenario</p> <p>The wording in NPA 2014-29 (C)(3) paragraphs 8.1.2 (page 3) and 8.1.6 (page 61) still refer to skill test or proficiency check scenarios "developed and approved by the competent authority".</p> <p>The FEM [NPA 2014-29 (C)(3)] should be aligned with the new wording proposed in Appendix 9 to NPA 2014-29 (A).</p> <p>Rationale: This wording is not consistent with the amendment of Appendix 9 paragraph (6) as proposed in NPA 2014-29 (A) (page 172/253).</p>	
8	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.6. Pass/fail criteria	58 - 71	<p>Content of the training/skill test/prof check p 66 to 70/131, tables</p> <p>CPL skill test and mandatory items</p> <p>The content of the Appendix 9 Annex I – Part FCL has been reproduced in NPA 2014-29 (C)(3) (pages 66-70). In Appendix 9 Annex I (class rating) the following items are mandatory:</p> <p>item 1.3 (engine starting malfunction), item 1.7 (climbing Vx/Vy), and item 5.1 (rejected take-off).</p>	

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			<p>These items are not mentioned in the CPL skill test form [see paragraph 2.3.12 of NPA 2014-29 (C)(1) (pages 92-94)]. There is only some general guidance to the examiner mentioned in paragraph 2.3.6 of NPA 2014-29 (C)(1) (page 42) indicating that the examiner may simulate, for example, an engine fire during start-up and in paragraph 2.3.7 (a) NPA 2014-29 (C)(1) (page 50).</p> <p>We suggest to align paragraph 2.3.12 of NPA 2014-29 (C)(1) (CPL skill test form) with Appendix 9 especially with regard to the mandatory items.</p> <p>Rationale: To have consistency.</p>	
13	Flight Examiner Manual — 8. Module 8 — Test standards, class/type ratings, and proficiency checks: Aeroplanes — 8.1. Chapter 1 — Class ratings: Aeroplanes — 8.1.6. Pass/fail criteria	58 - 71	<p>Appendix 9 p 62/131</p> <p>Inconsistencies</p> <p>There is a consistency issue between items (13) to (18) of NPA 2014-29 (C)(3) paragraph 8.16 Appendix 9 (page 62) and items (13) to (18) of NPA 2014-29 (A) Appendix 9 (page 173).</p> <p>There is a consistency issue between item (24) of NPA 2014-29 (C)(3) paragraph 8.16 Appendix 9 (page 70) and paragraph 6 "Multi-pilot aeroplanes and single pilot high performance complex aeroplanes" of NPA 2014-29 (A) Appendix 9 (page 182). For instance there are no items (f) to (i) in NPA 2014-29 (C)(3) whereas these items exist in NPA 2014-29 (A).</p> <p>The FEM (NPA 2014-29 (C)(3) should be aligned with the new Appendix 9 of NPA 2014-29 (A).</p> <p>Moreover we feel that the Training and Report Form for SP HPA Complex aeroplanes is missing in the FEM.</p> <p>We think this all must be aligned.</p> <p>Rationale: Consistency of texts.</p>	
14	Flight Examiner Manual — 8. Module 8 —	58 - 71	Skill tests and mandatory items p 66 to 70/131	

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	<p>Test standards, class/type ratings, and proficiency checks:  Aeroplanes —  8.1. Chapter 1 — Class ratings:  Aeroplanes —  8.1.6. Pass/fail criteria</p>		<p>The content of the Appendix 9 Annex I Part-FCL has been reproduced in NPA 2014-29 (C)(3) (pages 66-70). In Appendix 9 Annex I (class rating) the following items are mandatory:</p> <p>item 1.3 (engine starting malfunction),  item 1.7 (climbing Vx/Vy), and  item 5.1 (rejected take-off).</p> <p>However, these items are not mentioned in the CPL skill test form (see paragraph 2.3.12 of NPA 2014-29 (C)(1). There is only some general guidance to the examiner mentioned in paragraph 2.3.6 of NPA 2014-29 (C)(1) (page 42) indicating that the examiner may simulate, for example, an engine fire during start-up and in 2.3.7 (a) of NPA 2014-29 (C)(1) (page 50).</p> <p>We propose to align paragraph 2.3.12 of NPA 2014-29 (C)(1) (CPL skill test form) with Appendix 9 especially with regard to the mandatory items.</p> <p>Rationale  Clarity, consistency.</p>	