

E Conditions Final Consultation Comment Response Document

CAP1353



Published by the Civil Aviation Authority, 2015

Civil Aviation Authority
Aviation House
Gatwick Airport South
West Sussex
RH6 0YR

You can copy and use this text but please ensure you always use the most up to date version and use it in context so as not to be misleading, and credit the CAA.

First published November 2015

Enquiries regarding the content of this publication should be addressed to: ga@caa.co.uk

The latest version of this document is available in electronic format at www.caa.co.uk

Document ID: CAP 1353 2015

Contents

Background	4
Consultation Responses	5

.....

Background

This is a comment response document following the final consultation on the proposal to allow the operation of experimental aircraft under E Conditions, CAP 1220.

The final consultation took place between Thursday 23rd July and Wednesday 19th August 2015.

Document Sharing Hub

Consultation Responses

Commentor:	Respondent No. 1
Comment:	You may like to consider the addition of a 'purpose to fly' of 'Sales and Market Evaluation'. This would make it possible for a magazine aviation journalist to fly the aircraft either as the pilot, if suitably qualified/competent or as a passenger/co-pilot for the purpose of 'market evaluation'. Flying a 'journalist' as part of the 'test team' is not really a comfortable thing to do and if shove came to push would be difficult to justify/prove....at the subsequent enquiry!! This would give valuable commercial feedback to a company as to how the market would/could receive their aircraft/modification etc. A simple flight time limit could be placed on the aircraft, say 40 hours prior to being allowed to carry members of the 'press'! If my memory serves me right I believe that the FAA have a similar classification in their 'experimental' category and we used this whilst operating the Europa US company demonstrators.
Authors' Response:	Chapter 4 – 'Demonstration of the Aircraft' addresses this issue. To include flights for sales and marketing purposes would require additional airworthiness assurance which goes beyond the intent of E Conditions.

Commentor:	Respondent No. 2
Comment:	I attended the RAeS conference last November and commented on the proposal at the time. As the owner of a consulting firm which has specialised in aircraft development and certification (previously CAA DOA DAI/1828/01) I have first-hand experience of the limitations within the current system. Now the CAA has seen sense to initiate UK Experimental E-conditions we should lose far fewer innovative and technologically important projects to the US and mainland EU. One concern I had regarding the A8-26 organisation, our experiences in getting modification through the LAA (PFA) in the past were universally slow and requiring more information



	than the equivalent Mod submitted via the DOA route. However, I am a participant in the first professional Experimental E-Conditions project (Mr Mark Hales is the Competent Person) which is being granted to him after a consultation and interview with Francis Donaldson of the LAA. So it appears this hurdle at least is now negotiable without delay. The acid proof of this will be a potential requirement to examine the project dossier, which I suspect the LAA will insist on doing. I have noted that Method 1 – RAeS route requires full membership and CEng status, which I will now pursue as a mid-term objective in order to initiate and become a Competent Person for other projects.
Authors' Response:	Comments noted.

Commentor:	British Gliding Association
Comment:	The British Gliding Association fully welcomes and supports the concept of a UK national Experimental Category for use in experimentation and proof of concept evaluations for all light aircraft in UK. In the case of pure sailplanes, within our delegated airworthiness system, the BGA has historically operated such a system concept, applied to nationally registered sailplanes under our management. The BGA views the proposed system as proportionate and sensibly risk based. Our Technical Committee has been involved in the development of these proposals and the BGA would expect to take up the practices of this well formalised approach, for application to UK registered sailplanes. In future, for wider applications to SLMG's and tugs, we expect to be users of this new approach. We would further note the lack of such a system within EASA regulations, which we find regrettable. Our only view of principle is that is regrettable that this remit for limited experimentation cannot be used to deliver concepts to market without the full application of the full airworthiness and design qualification system. Sport aviation has thrived on developments by individuals and small groups of inventors,