

Issued: 12 December 2014

Requirement for the 'Base Training' Portion of an Approved Type Rating course (Aeroplanes) to be Conducted by an ATO

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

Recipients are asked to ensure that this Information Notice 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:	Not primarily affected
Air Traffic:	Not primarily affected
Airspace:	Not primarily affected
Airworthiness:	Not primarily affected
Flight Operations:	All AOC Holders
Licensed/Unlicensed Personnel:	All Pilots, Registered Training Facilities, Flight Training and Approved Training Organisations

1 Introduction

- 1.1 The purpose of this Information Notice (IN) is to advise that the European Aviation Safety Agency (EASA) now interprets Part-FCL to mean that the take-offs and landings in the aeroplane that must be completed before a Type Rating is issued, must be carried out under the control of an Approved Training Organisation (ATO). The completion of the take-offs and landings is commonly referred to as 'base training'.
- 1.2 This IN also advises a transitional period that the UK CAA is putting in place to give stakeholders time to move to compliance with EASA's interpretation of the rule. During this period, the UK CAA will continue to accept base training conducted outside of the control of an ATO for the issue of Type Ratings.
- 1.3 In this IN 'Part-FCL' means Annex I to Regulation (EU) No.1178/2011 (as amended), which is commonly referred to as the 'EASA Aircrew Regulation'. The abbreviations used have the meanings set out in that regulation

2 Requirement For The Conduct of Base Training

- 2.1 The requirements to be complied with in order to qualify for an aeroplane type rating are set out in Part-FCL, Subpart H and the referenced Appendices. Further requirements that apply to the approval of Type rating courses are specified in Part-ORA, ORA.ATO.125. EASA has published associated Acceptable Means of Compliance (AMC) and Guidance Material (GM) for Part-FCL and Part-ORA.
- 2.2 With the exception of Zero Flight Time Training (ZFTT) courses, the Type Rating course requirements for aeroplanes stipulate that the applicant shall complete take offs and landings in the aeroplane under the supervision of an appropriately qualified instructor. See AMC2

ORA.ATO.125(k). This base training is commonly carried out after the applicant has completed the Type Rating training and passed the skill test in a simulator with an examiner.

- 2.3 Following discussions between EASA and the Member States, EASA undertook a review of the meaning of the requirements for base training. They concluded that the base training is part of the approved Type Rating course and therefore, according to Part-FCL, it must be completed under the control of an ATO. This clarification means that the previous UK practice of accepting base training with a Type Rating Instructor (TRI), completed independently of any training organisation, must cease.
- 2.4 According to EASA, base training may be conducted: by the ATO that provided the simulator-based Type Rating course; or by another ATO that is approved to provide at least the base training part of the Type Rating course for the type of aeroplane. In the latter case, there does not have to be any agreement, connection or contract between the two ATOs.
- 2.5 Regardless of whether the operator of the aircraft that will be used is an AOC holder, the base training must be carried out under the supervision of an ATO that has approval for at least the base training part of the Type Rating training. This may be an ATO that is part of the operator's organisation. If the ATO is not part of the organisation that operates the aircraft that is to be used for the base training, there must be an arrangement in place between the ATO and the operator so that the ATO oversees the base training.
- 2.6 ATOs may apply for approval to conduct any combination of the following for a Type Rating course: simulator only training, simulator plus base training, base training only and/or an acceptable combination of aircraft and simulator training.

3 When It Is Impractical To Comply With The Regulation

- 3.1 There may be circumstances when it is impractical to complete base training for a Type Rating under the control of an ATO - such as when there are no ATOs that operate aircraft of the specific type. Where a UK licensed pilot is attempting to qualify for a Type Rating and can justify that he cannot complete the base training under the control of an ATO, the pilot or his/her employer may apply to the UK CAA for an exemption to allow the training to take place independently in a representative aircraft with a Type Rating Instructor qualified to instruct on the aircraft type.
- 3.2 The UK CAA **cannot** grant exemptions for pilots who hold licences issued by other Competent Authorities. The holders of such licences who wish to request exemption from completing the base training at an ATO should contact their own licence issuing authority for advice.
- 3.3 The only legal provision for exemption to this rule is under Article 14(4) of Regulation (EC) No. 216/2008. This reads as follows:

"4. Member States may grant exemptions from the substantive requirements laid down in this Regulation and its implementing rules in the event of unforeseen urgent operational circumstances or operational needs of a limited duration, provided the level of safety is not adversely affected. The Agency, the Commission and the other Member States shall be notified of any such exemptions as soon as they become repetitive or where they are granted for periods of more than two months.

5. The Agency shall assess whether the exemptions notified by a Member State are less restrictive than the applicable Community provisions and, within one month of being notified thereof, shall issue a recommendation in accordance with Article 18(b) on whether these exemptions comply with the general safety objectives of this Regulation or any other rule of Community law."