

# Consultation: Legislation for new types of Vertical Take-Off and Landing (VTOL) aircraft

## Part D: Personnel Licensing

### [UK Regulation \(EU\) No 1178/2011](#)

CAP3267D

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## Part D: Personnel Licensing

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### Summary

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In [CAP 3186](#), the CAA consulted on personnel licensing pathways for new types of Vertical Take-off and Landing (VTOL) aircraft. Feedback confirmed broad support for the following approaches:

- Application of the existing principles in UK Regulation (EU) 1178/2011 (“the Aircrew Regulation”) licensing framework with appropriate amendments to deliver a licensing pathway for the operation and integration of Powered-Lift and Non-Conventional Helicopters into the UK aviation sector.
- Experience requirements and prerequisites for the issue of ‘Type Ratings-Powered Lift’ will be determined by original equipment manufacturers (OEMs) in the Certification Specifications for Operational Suitability - Flight Crew Data (CS-FCD), enabling a personnel licensing pathway for aircraft defined as Powered-Lift.
- Amendments to the Aircrew Regulation in respect of the following prerequisites:
  - Powered-lift aircraft certified for single-pilot operations will not be subject to multi-crew cooperation (MCC) requirement.
  - Prerequisite for Instrument Rating (IR) will apply to operations under Instrument Flight Rules (IFR), subject to the provisions of FCL.600 IR. Operations under Visual Flight Rules (VFR) will not be subject to this requirement.
- Existing experience requirements and prerequisites for the issue of ‘Type Ratings-Helicopter’ provide a suitable licensing platform for eVTOL types that meet the definition of a helicopter, including those that we will define as Non-Conventional Helicopters due to their potential lack of autorotation capability. We propose to use this existing framework unless otherwise determined in the operational suitability data (OSD).
- We proposed to enable a pathway for Private Pilot Licence (PPL) holders to a ‘Type Ratings-Powered Lift’ subject to experience requirements and prerequisites determined in the OSD. OEMs will provide data relevant to the aircraft within their Operational Suitability Data-Flight Crew (OSD-FC).

This consultation provides further detail on the proposed changes arising from responses to the initial consultation on our policy framework for new types of VTOL aircraft. Where proposals were originally stated in the consultation closing January 2026, we have included updates on how we intend to progress these.

The proposals largely relate to the Aircrew Regulation. A small number of changes are proposed for The Air Navigation Order 2016 where relevant or necessary.

We propose to amend the regulations to the extent necessary to enable innovation and integration of new VTOL aircraft using the principles of the Powered-Lift category.

Where appropriate, indicative draft changes to the text of regulation are included with new text in grey highlight and deleted text by ~~strikeout~~. Text should not be interpreted as final.

Links to the text of existing regulations in the CAA [Aviation Regulatory Library](#) have been included.

## The Aircrew Regulation

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### Annex I Part-FCL

#### **Subpart A – General Requirements**

##### **FCL.010 Definitions**

Amendments to definitions are proposed to support delivery of a pilot licensing pathway enabling commercial and private pilot licence holders to fly new types of VTOL aircraft safely. We invite feedback on the proposed approach and on all definitions that may be affected by innovation, to help inform our approach.

Indicative changes to [FCL.010 Definitions](#):

~~‘Powered-lift aircraft’ means any aircraft deriving vertical lift and in-flight propulsion/lift from variable geometry rotors or engines/propulsive devices attached to or contained within the fuselage or wings~~

“Powered-Lift” – a heavier-than-air aircraft capable of vertical take-off, vertical landing, and low-speed flight, which depends principally on engine-driven lift devices or engine thrust for the lift during these flight regimes, and on non-rotating aerofoil(s) for lift during horizontal flight”

##### **Rationale**

Proposed amendments to FCL.010 will update the existing UK definition of ‘Powered-Lift aircraft’ to capture new types of VTOL aircraft and to align with the ICAO definition from Annex 1.

***Question 1: Do you agree or disagree with the proposed changes to FCL.010 Definitions with reference to personnel licensing of new VTOL aircraft? Please explain your answer.***

#### **Subpart C - PRIVATE PILOT LICENCE (PPL)**

Proposed amendments to Subpart C specific requirements for the PPL aeroplanes and helicopters arise from the widely supported feedback on the initial consultation proposal to enable a new pathway for existing Private Pilot Licence (PPL) holders to pursue both Powered-Lift and Non-Conventional Helicopter type ratings for non-commercial purposes. We do not propose an ab-initio flight training pathway for new VTOL aircraft in this consultation. Further consideration will be given to ab-initio pathways in the future.

##### **Section 2 - Specific requirements for the PPL aeroplanes — PPL(A)**

[FCL.205.A PPL\(A\) — Privileges](#)

##### **Section 3 - Specific requirements for the PPL helicopters — PPL(H)**

[FCL.205.H PPL\(H\) — Privileges](#)

## Rationale

We propose to amend Subpart C – Private Pilot Licence (PPL) and associated provisions including [FCL.205.A PPL\(A\) — Privileges](#), and [FCL.205.H PPL\(H\) — Privileges](#) to the extent necessary to enable PPL licence holders to exercise privileges on Powered-Lift aircraft. Powered-Lift is a recognised category within ICAO Annex 1, and a Powered-Lift rating can be endorsed on another category of licence. These proposed amendments would recognise the privileges of the Powered-Lift type rating within the scope of privileges held for an aeroplane or helicopter category.

***Question 2: Do you agree or disagree with the proposed changes to FCL.205.A PPL(A) — Privileges? Please explain your answer.***

***Question 3: Do you agree or disagree with the proposed changes to FCL.205.H PPL(H) — Privileges? Please explain your answer.***

## Subpart D – Commercial Pilot Licence – CPL

Proposed amendments to Subpart D arise from the widely supported feedback on initial consultation proposal to use the existing legislative framework and the principles of Powered-Lift and helicopter type rating to deliver a personnel licensing pathway for commercial licence holders to pursue Powered-Lift and Non-Conventional Helicopter type ratings.

## Rationale

We propose to amend Subpart D – Commercial Pilot Licence (CPL) and associated provisions including [FCL.305 CPL — Privileges and conditions](#) to the extent necessary to enable CPL licence holders to exercise privileges on Powered-Lift aircraft. Powered-Lift is a recognised category within ICAO Annex 1, and a Powered-Lift rating can be endorsed on another category of licence. These proposed amendments would recognise the privileges of the Powered-Lift type rating within the scope of privileges held for an aeroplane or helicopter category.

***Question 4: We invite views on the proposed approach to FCL.305 CPL — Privileges and conditions and associated provisions? Please explain your answer.***

## Subpart F – Airline Transport Pilot Licence – ATPL

Proposed amendments to Subpart F arise from the widely supported feedback on initial consultation proposal to use the existing legislative framework and the principles of Powered-Lift and helicopter type rating to deliver a personnel licensing pathway for commercial licence holders to pursue Powered-Lift and Non-Conventional Helicopter type ratings.

## Rationale

We propose to amend Subpart F – Airline Transport Pilot Licence (ATPL) and associated provisions, including [FCL.505 ATPL — Privileges](#) to the extent necessary to enable ATPL

licence holders to exercise privileges on Powered-Lift aircraft. Powered-Lift is a recognised category within ICAO Annex 1, and a Powered-Lift rating can be endorsed on another category of licences permitted. These proposed amendments would recognise the privileges of the Powered-Lift type rating within the scope of privileges held for an aeroplane or helicopter category.

***Question 5: Do you agree or disagree with the proposed changes to FCL.505 ATPL — Privileges and associated provisions? Please explain your answer.***

## **Subpart G - INSTRUMENT RATING — IR**

Proposed amendments to Subpart G arise from the generally supported proposal within our initial consultation to amend the application of the current prerequisite requirement for an Instrument Rating (IR) to apply to operations in the context of Instrument Flight Rules (IFR) only. We also intend to correct an error in reference to FCL.825.

### **Section 1 Common Requirements**

We propose amendments to Subpart G – Instrument Rating – IR and associated provisions, in particular [FCL.600 IR — General](#) and [FCL.610 IR — Prerequisites and crediting](#) to the extent necessary to enable licence holders to exercise existing IR privileges on Powered-Lift aircraft subject to the applicable provisions where a type rating has been endorsed on the licence in accordance with FCL.720.PL and to recognise hours flown as PIC in Powered-Lift aircraft in the case of IR applications.

### **Rationale**

The proposed changes will facilitate an IR rating endorsed on the category of licence held to be used on a Powered-Lift category, and will enable the cross crediting of flight hours on the Powered-Lift category and the introduction of a Powered-Lift Instrument Rating.

***Question 6: Do you agree or disagree with the proposed changes to FCL.600 IR — General and FCL.610 IR — Prerequisites and crediting. Please explain your answer.***

## **Subpart H - CLASS AND TYPE RATINGS**

New type rating training courses are subject to the training standards determined in the OSD, aligning with the current approach to type rating training. CS-FCD enables the determination of the specific type rating requirements for new aircraft types. It provides a standardised data-driven process to ensure pilots receive the appropriate training for a particular aircraft type, which is then reflected on their license.

### **Section 2 - Specific requirements for the aeroplane category**

[FCL.730A Specific requirements for pilots undertaking a zero flight time type rating \(ZFTT\) course — aeroplanes](#)

Stakeholders have expressed an interest in the applicability of this provision in the context of innovation and new VTOL aircraft. FCL.730.A sets out requirements for a zero flight

time type rating course where take-off and landing training may be conducted on commercial flights. The requirements are based on large transport aircraft and initial flights are conducted with an experienced trainer. ZFTT can be undertaken by pilots of aeroplanes with stipulated prerequisite experience on CS-25 or equivalent or on a multi-pilot turbo-prop aeroplane having a maximum certified take-off mass of not less than 10 tonnes or a certificated passenger seating configuration of more than 19 passengers, applying for a subsequent multi-pilot aircraft (MPA) type rating. Zero flight time type rating courses are not available for initial MPA or single pilot type ratings. Where the specific requirements cannot be met, take-off and landing training is conducted on a standalone training flight without passengers on board.

We do not propose amendments to this provision.

### **Rationale**

We do not have a dataset to support a change to this part of the regulation applicable to large transport aeroplanes (CS-25 or equivalent) with a mature certification framework developed over decades for mass public transport.

New VTOL aircraft use case aligns with urban or regional air mobility and small passenger loads. Innovation is being enabled and certified under emerging frameworks, adopting a performance and risk-based approach tailored to novel designs and operations. A standardised design approach for new VTOL aircraft has not yet been established, and during the innovation phase, VTOL platforms have not yet matured in design. Similarities in handling characteristics are not established and performance is still evolving. Training and assessment of pilot competence on dissimilar VTOL aircraft will be established by OSD-FC.

While we do not propose amendments to this provision, we invite submissions on change proposals supported by datasets to this approach for future consideration to support our objective of continuing to protect people while enabling aerospace.

***Question 7: Do you agree or disagree with the proposed approach to FCL.730A Specific requirements for pilots undertaking a zero flight time type rating (ZFTT) course — aeroplanes? Please explain your answer.***

### **Section 3 - Specific requirements for the helicopter category**

#### **[FCL.720H Experience requirements and prerequisites for the issue of type ratings — helicopters](#)**

Unless otherwise determined in the operational suitability data, the existing experience requirements and prerequisites for the issue of 'Type Ratings-Helicopter' provide a suitable licensing platform for aircraft we will define as Non-Conventional Helicopters, and we propose to use this existing framework. This will remain an area subject to review as OEMs of such aircraft provide additional information to the CAA.

**Question 8: Do you agree or disagree with the proposed approach to FCL.720H Experience requirements and prerequisites for the issue of type ratings — helicopters? Please explain your answer.**

#### **Section 4 - Specific requirements for the Powered-Lift aircraft category**

##### FCL.720.PL Experience requirements and prerequisites for the issue of type ratings — powered-lift aircraft

Certification Specifications for Operational Suitability Data—Flight Crew Data (CS-FCD) enables the determination of the specific type rating requirements for new aircraft types. It provides a standardised data-driven process to ensure pilots receive the appropriate training for a particular aircraft type, which is then reflected on their license.

Indicative changes to [FCL.720PL Experience requirements and prerequisites for the issue of type ratings — powered-lift aircraft](#):

Unless otherwise determined in the operational suitability data established in accordance with Annex I (Part-21) to Regulation (EU) No 748/2012, an applicant for the first issue of a Powered-Lift type rating shall comply with the following experience requirements and prerequisites:

(a) ~~for pilots of aeroplanes~~ Multi-pilot Powered-Lift Pilots of aeroplanes must meet the following requirements before starting the type rating training course:

- (1) hold a CPL/~~IR(A)~~ with ATPL theoretical knowledge or an ATPL(A)
- (2) hold a certificate of completion of an MCC course
- (3) have completed more than 100 hours as pilot on multi-pilot aeroplanes;
- (4) have completed 40 hours of flight instruction in helicopters;
- (5) for IFR operations hold an IR(A)

(aa) Single pilot Powered-Lift. Pilots of aeroplanes must meet the following requirements before starting the type rating training course

- (1) hold at least a PPL with ATPL theoretical knowledge or an ATPL(A) or hold a certificate of completion of a pre-entry course conducted to an appropriate level for an initial Powered-Lift type rating.
- (2) have completed more than 100 hours as PIC aeroplanes;
- (3) have completed 40 hours of flight instruction in helicopters;
- (4) for IFR operations hold an IR(A)

(b) ~~for pilots of helicopters:~~ Multi-pilot Powered-Lift Pilots of helicopters must meet the following requirements before starting the type rating training course:

- (1) hold a CPL/~~IR(H)~~ with ATPL theoretical knowledge or an ATPL/IR(H);
- (2) hold a certificate of completion of an MCC course,
- (3) have completed more than 100 hours as a pilot on multi-pilot helicopters;
- (4) have completed 40 hours of flight instruction in aeroplanes;
- (5) for IFR operations hold an IR(H)

(bb) Single pilot Powered-Lift. Pilots of helicopters must meet the following requirements before starting the type rating training course

- (1) hold at least a PPL with ATPL theoretical knowledge or an ATPL(H) or hold a certificate of completion of a pre-entry course conducted to an appropriate level for an initial Powered-Lift type rating.:
- (2) have completed more than 100 hours as PIC helicopters
- (3) have completed 40 hours of flight instruction in aeroplanes;
- (4) for IFR operations hold an IR(H)

(c) ~~for pilots qualified to fly both aeroplanes and helicopters:~~ Multi-pilot Powered-Lift Pilots qualified to fly both aeroplanes and helicopters must meet the following requirements before starting the type rating training course:

- (1) hold at least a CPL(H);
- (2) hold an ~~IR~~ and ATPL theoretical knowledge or an ATPL in either aeroplanes or helicopters;
- (3) hold a certificate of completion of an MCC course in either helicopters or aeroplanes;
- (4) have completed at least 100 hours as a pilot on multi-pilot helicopters or aeroplanes;
- (5) have completed 40 hours of flight instruction in aeroplanes or helicopters, as applicable, if the pilot has no

experience as ATPL or on multi-pilot aircraft.

(6) for IFR operations hold an IR for the category of licence held

(cc) Single pilot powered-lift Pilots qualified to fly both aeroplanes and helicopters must meet the following requirements before starting the type rating training course:

(1) hold at least a PPL(A) and a PPL(H)

(2) hold ATPL theoretical knowledge or an ATPL in either aeroplanes or helicopters, or hold a certificate of completion of a pre-entry course conducted to an appropriate level for an initial Powered-Lift type rating.:

(2) have completed more than 100 hours as PIC on helicopters or aeroplanes

(3) have completed 40 hours of flight instruction in aeroplanes or helicopters, as applicable, if the pilot has no experience as ATPL or on multi-engine aircraft;

(4) for IFR operations hold an IR for the category of licence held

## Rationale

Experience requirements and prerequisites for licence holders applying for the first issue of a Powered-Lift type rating are determined by the operational suitability data (OSD) established in accordance with Annex I (Part-21) to Regulation (EU) No 748/2012.

Theoretical Knowledge is informed by the OEM within the OSD-FC. Notwithstanding, where current provisions are written for multi-pilot operations, proposed amendments would recognise multi-pilot and single pilot operations and align prerequisite requirements to the type of operation being conducted.

We invite submissions on changes you consider may be required, supported by datasets, to the hours-based approach, to further inform our thinking. We will be looking at the proficiency of the individual to operate these aircraft types within the skill test.

***Question 9: Do you agree or disagree with the proposed approach to FCL.720PL Experience requirements and prerequisites for the issue of type ratings — Powered-Lift aircraft Please explain your answer.***

[FCL.725.PL Flight instruction for the issue of type ratings — powered-lift aircraft](#)

Flight instruction for a Powered-Lift type rating must be completed in both the aircraft and a suitably qualified flight simulation training device (FSTD) representing the aircraft.

We do not propose to amend this provision.

### **Rationale**

Qualification of the Flight Simulation Training Device (FSTD) are set out in the relevant requirements of Annex VI (Part-ARA) and Annex VII (Part-ORA). FSTD is an area that will be considered as a consequence of innovation and training methodology, with regard to single or dual control systems, simulator based training and initial familiarisation flights, and use of other training devices (OTD). Identification of special condition subjects for FSTD representing novel types of aircraft has been addressed in Chapter 3.2 [Position Paper – FSTD Special Conditions development and assessment process](#). Where existing certification specifications for FSTD cannot be used entirely, OSD is applicable, especially UK CS-SImD Issue 2. OEMs will propose the amount of time spent within a simulator/other training device, and practical elements on the aircraft on submission of their OSD-FC. We will be looking at the proficiency of the individual to operate these aircraft types within the skill test.

***Question 10: Do you agree or disagree with the proposed approach to FCL.725.PL Flight instruction for the issue of type ratings — Powered-Lift aircraft ? Please explain your answer.***

### **Subpart I - ADDITIONAL RATINGS**

Amendments to FCL.720.PL include the requirement to hold privileges to fly at night in Powered-Lift aircraft where applicable. CPL and ATPL licence holders hold night privileges. A PPL licence does not include night privileges, and an additional night rating is required to fly at night. We propose amendments to Subpart I Additional Rating and associated provisions to the extent necessary and subject to FCL.810 Night Rating, to enable licence holders to exercise night privileges on Powered-Lift aircraft when a type rating has been endorsed on the licence in accordance with FCL.720.PL.

### **Rationale**

The proposed approach is intended to facilitate alignment of the prerequisite experience requirements and recognise Powered-Lift flight time for cross crediting with the use case for Powered-Lift aircraft.

***Question 11: Do you agree or disagree with the proposed changes to FCL.810 Night rating? Please explain your answer.***

### **Subpart J – INSTRUCTORS**

[FCL.900 Instructor certificates](#)

Issue of a specific certificate granting privileges for flight instruction and examination is possible where special conditions arise, including where compliance with the existing requirements are not possible, such as the introduction of a new aircraft within the United Kingdom.

We do not propose amendments to Subpart J – Instructors.

### **Rationale**

Due to the wide range of types and number of variations in characteristics among new types of VTOL aircraft, this is an area which will be reviewed on submission by the OEM of their OSD-FC. The Instructors within the OEM will be preparing the outline of the learning objectives, both theoretical and practical.

***Question 12: We invite views on the proposed approach to Subpart J- Instructors. Please explain your answer.***

### **Appendices to Annex I**

#### [Appendix 8 — Cross-crediting of the IR part of a class or type rating proficiency check](#)

We invite submissions on changes you consider may be required, to Appendix 8 [Cross-crediting of the IR part of a class or type rating proficiency check](#) to provide equivalence in the Powered-Lift category to aeroplane and helicopter categories.

### **Rationale**

The proposed changes will support the cross-crediting of the IR part of a type rating proficiency check where required for IFR operations for Powered-Lift aircraft.

***Question 13: Do you agree or disagree with the proposed changes to Appendix 8 Cross-crediting of the IR part of a class or type rating proficiency check? Please explain your answer.***

#### [Appendix 9 — Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs](#)

##### [C Specific requirements for the helicopter category](#)

##### [D Specific requirements for the powered-lift aircraft category](#)

The CAA draws attention to Appendix 9 in the case of skill tests or proficiency checks for non-conventional helicopter and Powered-Lift type ratings, applicable to future VTOL operations.

We invite submissions on changes that may be required, based on datasets available to OEMs, with particular reference to:

## Flight Test Tolerance

### Content of the Training/Skill Test/Proficiency Check

Section 1 – Preflight preparations and checks

Section 2 – Flight manoeuvres and procedures

Section 3 – Normal and abnormal operations of systems and procedures

Section 4 – Abnormal and emergency procedures

Section 5 – Instrument flight procedures

Section 6/7 – Optional equipment

### **Rationale**

Submissions based on datasets support and inform our thinking and ensure that specific requirements for testing in the type rating proficiency check for Non-conventional Helicopter and Powered-Lift aircraft, include changes arising from innovation.

***Question 14: We invite views on the proposed approach to Appendix 9 Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs? Please explain your answer.***

## [Annex VI AUTHORITY REQUIREMENTS FOR AIRCREW \[PART-ARA\]](#)

### [Subpart ATO - SPECIFIC REQUIREMENTS RELATED TO APPROVED TRAINING ORGANISATIONS \(ATOs\)](#)

Approved Training Organisations (ATO) – Amendments are not currently being proposed to training environments and course provision requirements. This area is likely to be unchanged where it remains suitable for purpose.

### **Rationale**

Training courses are normally the output of the training outcomes stated within the OSD-FC, informed by training that test pilots and other relevant persons have undertaken while involved with the certification of the aircraft. Information to lay out the basis of the syllabus for both theoretical and practical training can only be obtained towards the end of the certification process.

***Question 15: Do you agree or disagree with the proposed approach to Subpart ATO Specific requirements related to Approved Training Organisations (ATOs)? Please explain your answer.***

## Air Navigation Order

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We invite comments and feedback on provisions of the ANO that may be affected by innovation to help inform our approach to enabling innovation, with particular regard but not limited to Part 6, and Schedule 8:

- Part 6 – Aircrew deals with arrangements for aircrew, including provisions requiring aircrew to be licensed, and how such licences are granted and maintained.
  - Chapter 1 Flight crew licensing – requirement for licence (Articles 136 - 151)
  - Chapter 2 Flight crew licensing – grant of licence and maintenance of privileges (Articles 152 – 156)
- Schedule 8 Flight Crew of Aircraft – Licences, Ratings, Qualifications and Maintenance of Licence Privileges (Articles 152-159).

### **Rational**

Amendments to [The Air Navigation Order 2016](#) may be needed to support consistency and alignment with changes proposed in the Aircrew Regulation and to provide equivalence at national level supporting the delivery of a pilot licensing pathway, enabling commercial and private pilot licence holders to fly new types of VTOL aircraft safely.

***Question 16: Do you agree or disagree with the proposed approach to amendments to The Air Navigation Order 2016? Please explain your answer.***

## ANNEX A

## Abbreviations

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ANO – Air Navigation Order 2016

ATO – Approved Training Organisation

ATPL – Airline Transport Pilot Licence

CPL – Commercial Pilot Licence

CS FCD – Certification Specific Flight Crew Data

EU – European Union

FSTD – Flight Simulation Training Device

ICAO – International Civil Aviation Organisation

IFR – Instrument Flight Rules

IR – Instrument Rating

LAPL – Light Aircraft Pilot Licence

MCC – Multi-Crew Cooperation

MPA – Multi-Pilot Aircraft

MPL – Multi-Pilot Licence

NPPL – National Private Pilot's Licence

OEM – Original Equipment Manufacturer

OSD – Operational Suitability Data

OSD-FC – Operational Suitability Data - Flight Crew

OTD – Other Training Devices

PIC – Pilot in Command

PPL – Private Pilot License

eVTOL – Electronic Vertical Take-off and Landing

VFR – Visual Flight Rules

VTOL – Vertical Take-off and Landing

ZFTT – Zero Flight Time Training

## ANNEX B

## Summary of Questions

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**Question 1: Do you agree or disagree with the proposed changes to FCL.010 Definitions with reference to personnel licensing of new VTOL aircraft? Please explain your answer.**

**Question 2: Do you agree or disagree with the proposed changes to FCL.205.A PPL(A) — Privileges? Please explain your answer.**

**Question 3: Do you agree or disagree with the proposed changes to FCL.205.H PPL(H) — Privileges? Please explain your answer.**

**Question 4: We invite views on the proposed approach to FCL.305 CPL — Privileges and conditions and associated provisions? Please explain your answer.**

**Question 5: Do you agree or disagree with the proposed changes to FCL.505 ATPL — Privileges and associated provisions? Please explain your answer.**

**Question 6: Do you agree or disagree with the proposed changes to FCL.600 IR — General and FCL.610 IR — Prerequisites and crediting. Please explain your answer.**

**Question 7: Do you agree or disagree with the proposed approach to FCL.730A Specific requirements for pilots undertaking a zero flight time type rating (ZFTT) course — aeroplanes? Please explain your answer.**

**Question 8: Do you agree or disagree with the proposed approach to FCL.720H Experience requirements and prerequisites for the issue of type ratings — helicopters? Please explain your answer.**

**Question 9: Do you agree or disagree with the proposed approach to FCL.720PL Experience requirements and prerequisites for the issue of type ratings — Powered-Lift aircraft Please explain your answer.**

**Question 10: Do you agree or disagree with the proposed approach to FCL.725.PL Flight instruction for the issue of type ratings — Powered-Lift aircraft? Please explain your answer.**

**Question 11: Do you agree or disagree with the proposed changes to FCL.810 Night rating? Please explain your answer.**

**Question 12: We invite views on the proposed approach to Subpart J - Instructors? Please explain your answer.**

**Question 13: Do you agree or disagree with the proposed changes to Appendix 8 Cross-crediting of the IR part of a class or type rating proficiency check? Please explain your answer.**

**Question 14: We invite views on the proposed approach to Appendix 9 Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs? Please explain your answer.**

**Question 15: Do you agree or disagree with the proposed approach to Subpart ATO Specific requirements related to Approved Training Organisations (ATOs)? Please explain your answer.**

**Question 16: Do you agree or disagree with the proposed approach to amendments to The Air Navigation Order 2016? Please explain your answer**