

Consultation Response Document

Acceptable Means of Compliance (AMC) related to UK Regulation (EU) No 1178/2011 (the UK Aircrew Regulation)

Overview

This consultation opened on 2 May 2023 and closed 2 June 2023.

The Civil Aviation Authority is proposing an update within the Learning Objectives (LOs) of Acceptable Means of Compliance (AMC) related to UK Regulation (EU) No 1178/2011.

These amendments are to direct Training Providers and Students to the latest International Civil Aviation Organization (ICAO) documents related to the subject of the LOs stated within AMC1 FCL.310; FCL.515(b); FCL.615(b); FCL.825(d) Theoretical knowledge examinations.

The intent of this is to reduce the possibility of negative learning.

Outcome

The CAA had fourteen responses to the recent consultation of the updating of the learning objectives, nine from pilots and five from Flight Training Organisations.

On the following LOs the comments were made:

[LO 010.08.04.02.04](#)

Comment

I think for this whole concept it's important that the clarity is preserved, and this isn't used as another way of making the LOs so vague that anything could be classed as a compliant question. I have no issue with this question, I just wanted to make a general comment

Response

Noted. Thank you very much for your comment, it is agreed that the Learning Objectives (LOs) should remain focused, relevant and up to date.

Comment on the principle or policy included in the proposed change

CAA - Noted.

LO 032.04.01.07.01

Comment

For clarity, the source should include "Volume I - Aerodrome Design and Operations". Volume II Chapter 1 does not define runway surface conditions. Consider specifying "1.1 Definitions" as well.

Response

CAA - Noted, however, the proposed reference to ICAO Annex 14 Chapter 1 is considered adequate

LO 032.04.01.07.02

Comment

For clarity, the source should include "Volume I - Aerodrome Design and Operations". Volume II Chapter 1 does not define runway surface condition descriptors. Consider specifying "1.1 Definitions" as well.

Response

CAA - Noted, however, the proposed reference to ICAO Annex 14, Chapter 1 is considered adequate.

LO 050.10.03.01.05

Comment

Why has the reference been removed? I think it's always better to include references for avoidance of doubt on either side.

Agreed. The reference was no longer relevant because runway surface conditions and contamination are no longer reported in this way. A revised reference to ICAO Doc 9981 is therefore proposed as follows: "Remark: refer to ICAO Doc 9981, Part II, Chapter 2: Reporting format using standard Runway Condition Report (RCR)."

Consider adding as source:

- ICAO Annex 14, Vol I, Chapter 2, 2.9 Condition of the movement area and related facilities
- ICAO Doc 9981 PANS-AD, Part II, Chapter 2. Reporting format using standard runway condition report (RCR)

Response

CAA - Partially agreed: the ICAO Doc 9981 reference to be added to the LO: "Remark: refer to ICAO Doc 9981, Part II, Chapter 2: Reporting format using standard Runway Condition Report (RCR)."

Comment

"describe the assessment of "is an incomplete learning objective. Should be stated more concrete as: "Identify the codes used regarding the reporting...."

Response

CAA - Noted. The proposed re-wording of the LOs was reviewed by a panel of Subject Matter Experts. The wording used reflects the statements and phraseology used by ICAO.

[LO 071.02.13.05.02](#)

Comment

In ANY subject, these "how would you mitigate" or "what would be a suitable course of action" questions are just not workable. They're too vague and too open to individual interpretation - the correct answer depends on too many variables which are not given in the question. This, again, is why you need sources to quote from, otherwise students have no idea if the question was written with a A380 multi crew aircraft in mind or a single pilot Cessna Caravan - the answers would be very different!

Response

CAA - Noted. Guidance material given to UK CAA question authors states that the context of a question should be clearly and unambiguously presented in the question stem.

[LO 071.01.03.03.39](#)

Comment

Too detailed in description and identifying required answers, requiring inevitable changes in the future as and when SLOP changes. Recommend to end the sentence after "... (SLOP)".

Proposed text: "Describe the strategic lateral offset procedure (SLOP)".

Response

CAA - Agreed, the LO text will be amended to state: "Describe the strategic lateral offset procedure (SLOP)."

[LO 071.01.03.03.49](#)

Comment

Too detailed in description again, requiring inevitable changes in the future as and when these change changes. Not future proof, therefore.

Proposed text: "State the general procedures and concept of NAT in-flight contingency procedures"

Response

CAA - Agreed, The LO text will be amended to: "State the general procedures and concept of NAT in-flight contingency procedures"

General comments

Comment

The other concern I have (other than those I have already mentioned) is that subjects such as HPL have no references at all - this isn't acceptable and leads to alternative opinions such as TUC/EPT times and many others. Unless you're going to provide some sort of reference text or a lot more specific detail in the questions you will continue to open yourselves up to more criticism and potential appeals. HPL is not the only subject - I had 2 ex training captains in my Instrumentation class observing a few months ago and both of them commented that the questions couldn't be answered properly with the lack of detail provided in the question.

Ultimately, we all know (and if you don't then you should - please go and talk to some TKIs!) the whole system needs a massive overhaul and is no way fit for purpose but at least give the students something to refer to and eliminate the confusion.

Response

CAA - Noted. The provision of references and how these are presented will fall within the scope of a future consultation with industry.

Comment

The consultation does not include the option to comment where changes to the AMC should have been made but have not been proposed by the UK CAA. We have the following comments and proposals:

032 Aircraft Performance. The AMC only requires knowledge of piston-engine light singles and twins for CPL candidates, but these licence holders can operate PIC on Performance A aircraft such as multi-engine jets and turboprops. We consider it a significant safety issue that CPL holders are allowed to operate multi-engine jets and turboprops without the theoretical training required by an ATPL holder operating the identical aircraft and recommend that the CPL(A) syllabus (and HPA syllabus) be amended to match the LO requirements of ATPL(A) throughout the subject.

Response

CAA - Noted. This falls out-with the scope of the amendments proposed in this consultation. However, these comments will be considered further within the Authority.

Comment

032 Aircraft Performance. Learning Objectives 032 04 01 07 03 and 04 should be deleted in accordance with the parallel EASA syllabus because surface friction co-efficients are no longer quoted. We refer you to the Runway Condition Assessment Matrix adopted globally from November 2021.

Response

CAA - Agreed. Both LOs 032.04.01.07.03 and 032.04.01.07.04 will be deleted. For sequencing the LO numbers will remain, however, they will be marked "intentionally left blank".

Comment

062 Radio Navigation. LO 062 02 05 04 02 is out of date, the classification of ILS CAT III A, B and C no longer exists.

062 Radio Navigation. Topic 062 02 06 00 Microwave Landing System should be withdrawn in toto, because the equipment is no longer used in civil aviation.

062 Radio Navigation. The Learning Objectives for CB-IR are grouped with the EIR. We recommend the CB-IR Learning Objectives be amended to be identical to the IR Learning Objectives throughout because the ratings have the same privileges and therefore should require the same theoretical knowledge base, whereas the EIR has more restricted privileges.

Response

CAA - Noted. This falls out-with the scope of the amendments proposed in this consultation. However, these comments will be considered when the next update to the LOs is proposed to incorporate changes to legislation covering amongst other topics, Fuel Policy.

Comment

After a thorough review of the survey, we would still conclude that it contains nothing controversial.

All the question changes relate to readability and comprehension. One question additionally addresses a change in the regulations, relating to reduced lateral separation

We agree with all of the proposed changes, most are reflection of guidance introduced from TALPA ARC (FAA contaminated runway conditions study) and also for updated NAT procedures that have in fact been in use for some time.

Response

CAA - Noted, thank you for the comments.

Thanks

We would like to thank all those who participated in this consultation and therefore assisted in keeping the CAA's learning objectives (Los) relevant to those who will be taking theoretical examinations in the near future.

The CAA considers such consultations and the involvement of industry is important to the process of implementing or updating Legislation and its associated Acceptable Means of Compliance.