

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1	FCL.745.A	TMA	<p>Previously UPRT was for the most part contained in Air Operations as per the current TMA program. There was some UPRT implications for MPA Type Ratings in previous versions of Air Crew. However, now a heavy emphasis is being put on UPRT and specifically an "Advanced UPRT course" applicable to all type ratings (this includes SPA non-high performance complex aircraft which is the DHC6). These changes will be quite impactful to TMA training requirements. This is based on requirements for:</p> <ol style="list-style-type: none"> 1. Advanced UPRT must be done on an aircraft suitably certified to do this type of training, 2. and must be done at an ATO approved to do this training by an instructor qualified for this type of training. <p>There is a very detailed and specific instructor course requirement for any instructor to be approved to teach this UPRT course. As well there is an annual refresher training requirement for the instructor to maintain</p>	<p>Noted.</p> <p>it needs to be highlighted that 'grandfathering' is envisaged for holders of existing licences and ratings. This means that pilots already holding licences or ratings for which the new rules will require UPRT will not be forced to undergo additional training. However, pilots involved in commercial air transport will undergo UPRT as part of the operator training in accordance with Part.ORO Subpart FC.</p> <p>The advanced UPRT course according to FCL.745.A is designed to amplify knowledge and skills in upset prevention and, especially, upset recovery, with the final objective of exposing students and making them more resilient to psychological and physiological aspects usually experienced with a dynamic upset, which is difficult to be done in an FSTD. Students of an ATP integrated or an MPL training course will need to undergo this UPRT course as an integral part of the course. Additionally, this UPRT course will be a prerequisite for the first class or type rating for:</p> <ul style="list-style-type: none"> —single-pilot aeroplanes operated in multi-pilot operation; and —single-pilot high-performance complex aeroplanes; <p>Therefore, operators are encouraged to ensure that newly hired pilots provide a Certificate of Completion or an appropriate logbook entry to verify completion of the course.</p> <p>For further details please refer to EASA Opinion: Opinion No 06/2017.</p>	NA

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2	-	TMA	TMA not able to do a detailed review of the proposed changes due to the very short timeframe given. TMA needs more time to review the changes to identify any potential impacts on its operations.	Noted. CAA have not identified major impacts other than that has been provided additional time. A reasonable transitional period will be ensured for existing operators.	Refer to the revised document for the implementation date.
3	FCL.745.A	Villa Air	A Advanced UPRT course — aeroplanes, UPRT is also to be taught Under MCAR Air Ops ORO.FC.220&230. Hence during operator conversion if credit can be taken for those topics that are repetitive can be less burdensome and easier to implement.	Not Accepted. Refer to the response to comment no. 1	NA
4	FCL.745.A	Villa Air	1) It is supposed to be conducted by an FI not TRI. 2) It is Advanced Training not Type Specific UPRT. 3) It is to be conducted on an Aeroplane and no mention of FFS and no distinction has been made for Recovery training which requires an qualified FFS as per Air Ops.	Noted. Refer to the response to comment no. 1	NA
5	FCL.915(e)	Villa Air	Clause FCL.915(e) could not be found	Noted. The referred paragraph is in the draft document. Please refer to page no. 63. The summary of amendment to MCAR Aircrew is revised to indicate the change.	Summary of amendments revised.

Terminology

Accepted	The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text
Partially accepted	The CAA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
Noted	The CAA acknowledges the comment but no change to the existing text is considered necessary.
Not Accepted	The comment or proposed amendment is not shared by the CAA.