



Comment Form

Comment nr.....
(for EASA use only)

A-NPA 14-2006 (end of comment date: 16 October 2006)

Instructions:

Comments should be sent in 'WORD', using the following link: NPA@easa.europa.eu

This comment and the identity of the sender will be published in the Comment Response Document (CRD) unless a specific justified objection is received by EASA.

1a. **COMMENT TO (Specify clearly Part/Chapter Number):**

- I. General, II. Consultation, III. Comment Response Document
- IV. Background
- V.A. Concept: The state of play
- V.B. Concept: Principles used in the development of the concept
- V.C. Concept: Description of the concept
- V.D. Concept: Discussion
- Appendix 1 / Attachments
- General Comment(s)

1b. **AFFECTED PARAGRAPH (Specify clearly Paragraph Number):**

35 (Pilots Licensing)

2. **PROPOSED TEXT/ COMMENT:**

COMMENT: I fully support EASA's ambition to **simplify** the process of obtaining an Instrument Rating (IR) for the purpose of exercising (Recreational) Private Pilot Privileges in airplanes less than 2.000 kg.

3. **JUSTIFICATION:**

As Managing Editor of a widely read General Aviation Magazine and active IFR-Pilot I can confirm EASA's analysis that human factors and especially continued VFR flight into Instrument Meteorological Conditions is a leading cause of fatal accidents in the European GA-System.

Accident-Analysis undertaken by the German AIB (www.bfu-web.de) shows a startling number of accidents where aircraft that were perfectly capable and sufficiently equipped for IFR-flight crash due to the crew lacking basic instrument-flying skills and ratings to continue the flight safely under IFR.

Multiple surveys undertaken amongst our subscribers have yielded the consistent result, that a high number of VFR-only pilots would be eager to obtain an instrument rating, but that high costs (3 times the initial PPL-cost) and more prominently the enormous time-effort prevents them from pursuing and obtaining advanced qualifications.

It is my hope that EASA will be able to do what the FAA has been doing for decades: That is to define a curriculum and training syllabus for an (R)PPL-IR qualification that will allow private pilots of light and non-complex airplanes to obtain within weeks - not months - the necessary theoretical knowledge and practical flying skills to participate under Instrument Flight Rules in the European airspace and air traffic system. The wide spread introduction of integrated glass cockpits into the general aviation fleet < 2.000 kg should be seen as an asset in this endeavor.



Comment Form

Such an obtainable and feasible IR-Rating for private pilot privileges would constitute one of the biggest safety improvements in the area of human factor and VFR/IMC related accidents.

Pilots don't fly VFR in bad weather because they like to. Pilots WANT to obtain an IFR-Rating, but the current curriculum as laid out by the German interpretation of JAA-FCL, especially when it comes to content and available learning-styles (classroom vs. home study) is almost prohibitive for anyone pursuing a demanding professional career in a field other than aviation.

4. PERSON/ORGANISATION PROVIDING THE COMMENT:

Name : PILOT UND FLUGZEUG Attn. Jan Brill
Address : Regensburger Str. 61
Country : Germany
Phone : +49 9421 968464
Fax : +49 721 151 415985
E-mail : jan.brill@pilotundflugzeug.de

Dated: Oct. 6, 06



Comment Form

GUIDELINES TO COMMENT

1. For a better handling of comments we strongly recommend to use this form.
2. Please use **one form per comment and fill in completely the provided form.**
3. If there is insufficient space on the form, please use attachments and summarise your comments on the form.
4. In case of disagreement, failure to explain the reason(s) for disagreeing may well result in the comments being laid aside for lack of understanding.
For the same reason, the grounds for deleting a paragraph should be explained.
5. This comment and the identity of the sender will be published in the Comment Response Document (CRD) unless a specific justified objection is received by EASA (for more information see Regulation (EC) No 1049/2001 of The European Parliament and of The Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (Official Journal L 145 of 31 May 2001, page 43)).
6. All comments must be sent according to the instructions at the top of the document and should be received by EASA **not later than 16 October 2006.**