

## IAOPA eNews March 2009

---

[Saudi Aviation Club Applies for IAOPA Affiliation](#) | [IAOPA Europe Works on Instrument Rating for Private Pilots](#) | [IAOPA Planning Changes to Aerodrome Rescue and Firefighting Standard](#) | [IAOPA Works with AOPA US on Language Proficiency Endorsements](#) | [IAOPA Submits Comments on EASA FCL NPA](#) | [IAOPA Comments on ICAO WRC-11 Positions](#)

### **IAOPA States Priorities for 2009**

In response to an ICAO Air Navigation Commission request the IAOPA Secretariat noted that a recent ICAO press release emphasizing the need for trained aviation personnel to meet future staffing demands provided emphasis for general aviation. This is because a majority of aviation personnel receive their training and initial experience via general aviation and aerial work, therefore it is important to foster and facilitate those operations. The IAOPA statement continued:

"General aviation's priorities have always been the same: the need for access to airspace and airports and lowering operational costs. Without access operational freedom suffers; unless operational costs are reasonable the advantages of personal air transportation are lost.

"More specifically, we would like to see the following happen:

- Standardize requirements for closely controlled airspace and the classification of all airspace. The current lack of standardization has led to over-classification of airspace and the loss of freedom to fly for many VFR operations.
- Protect general aviation access to regional and small airports. Scheduled and unscheduled commercial air transport operations have been using smaller airports to avoid congestion and fees associated with large airports serving major metropolitan areas. While these regional and charter operators gain a significant advantage over legacy carriers when using smaller airports, general aviation may be either forced out due to slotting or excessive landing/handling fees.
- Costs associated with training, pilot currency, required equipment, airworthiness, air traffic routings and facilitation are all borne by the individual general aviation pilot or operator. This forces pilots/owners to fly less and may become less proficient as costs increase, thereby impacting safety. More importantly, these factors discourage potential pilots from pursuing aviation as a life opportunity. Therefore, carefully consider the cost-benefit ratio for general aviation when enacting SARPS.
- A good example of the above is the Annex 14 requirement to provide rescue and firefighting personnel and equipment for operations at all airports, including the smallest public use airports. The costs associated with maintaining equipment and personnel at small, low-traffic airports becomes prohibitive when applied to landing and handling fees. States with the most active general aviation activity have chosen file differences with ICAO that either eliminate this requirement or significantly alter it. We would like to eliminate this requirement for small airports that do not have commercial air transport service."

### **Saudi Aviation Club Applies for IAOPA Affiliation**

The Saudi Aviation Club (SAC) recently applied for IAOPA affiliation, stating a desire to be better connected with the international civil aviation community. The SAC has 400 members, operates four Cessna's F172 and three Stemme Gliders, and is headquartered at Thumama Airport, 80 km north of Riyadh. Currently there are branches of the club in the western, eastern and southern provinces - at Al khobar, Jeddah, Abha and Al Kharj, and further branches are planned for Jubail, Al Jouf, and Tabuk. SAC representative Omar AlHoshan notes, "General Aviation is somewhat new in Saudi Arabia, and the purpose of SAC and the initiative to become a member of IAOPA is geared towards encouraging and expanding GA activities locally as well as regionally. There are 152 general aviation aircraft registered in Saudi Arabia. The number is much higher if we take into consideration general aviation aircraft that are parked in Saudi Arabia but are registered in other countries."

If any IAOPA Board member has a comment regarding this application, please notify the Secretariat.

### **IAOPA Europe Works on Instrument Rating for Private Pilots**

IAOPA European affiliates have long noted that the JAA instrument rating (IR) is designed for professional pilots, requiring hundreds of hours of study for subjects of doubtful value to the private pilot. Therefore, the number of IRs issued to private pilots in Europe is quite low.

In an effort to rectify this situation IAOPA European Flight Crew Licensing Representative Pamela Campbell has been working with JAA officials for several years on the subject with limited results.

Recently, a higher level EASA study group has been making progress on distilling the IR knowledge requirements down to the essentials required by the private pilot. Representatives of IAOPA Europe, Europe Air Sports, PPL IR, EASA and a number of CAAs have been finding common ground to eventually put forward as a proposal. Michael Erb, IAOPA Europe Representative to the group said, "This work is essential for our pilots. The ability to operate in IMC will prove very valuable for the safety and utility of European private pilots."

### **IAOPA Planning Changes to Aerodrome Rescue and Firefighting Standards**

ICAO standards require that aerodromes maintain rescue and firefighting (RFF) equipment and trained personnel be on duty during flight operations. This creates operating restrictions and significant costs for pilots at many small airfields worldwide. When RFF facilities are not present flight operations may not be conducted, whether those operations are for commercial or non-commercial purposes. Yet, several of the most active general aviation States either have filed an exception to these ICAO standards or have reduced the RFF requirement to apply primarily to commercial operations. Therefore, IAOPA is compiling information and data that will support a petition to ICAO seeking relief from this burdensome standard. All affiliates are requested to submit information and data that will enable the Secretariat to make a convincing case for this petition with ICAO. Examples of information suitable for this purpose would be the costs associated with maintaining a fire brigade at general aviation airports, resulting charges and fees to pilots, restrictions on aerodrome operating hours as a consequence of the RFF requirement, and estimates as to how this requirement has restricted the growth of general aviation. Send inputs to John Sheehan at [jshee11@aol.com](mailto:jshee11@aol.com).

### **IAOPA Works with AOPA US on Language Proficiency Endorsements**

After March 2008 ICAO Annex 1 standards require all pilots to demonstrate a high level of English language proficiency for international operations, unless they demonstrate an equivalent level of proficiency for the language commonly used in the country in which they operate. Proof of compliance is shown by an endorsement on pilot licenses.

Holders of unrestricted FAA pilot certificates may obtain this endorsement online, however those certificates issued on the basis of an applicant's foreign pilot license (restricted certificates under FAR 61.75) must go through a different process. The process involves a validation of the foreign license and a visit by the pilot to an FAA office (unfortunately only available within the US) or through a FAA designated pilot examiner. This is a potentially expensive and time consuming process for those who live outside the US. If States choose to enforce the ICAO language proficiency standard many holders of FAA restricted pilot certificates will be forced to cease flying internationally or do so in violation of State regulations. IAOPA and AOPA-US are working with the FAA to identify alternative courses of action that would permit restricted certificate holders to obtain the endorsement without travelling to the US or finding a FAA pilot examiner. Since the search for alternatives has just begun there is no forecast of when a solution will be found, however IAOPA has been assured that the FAA is working on the issue.

### **IAOPA Submits Comments on EASA FCL NPA**

The European Aviation Safety Agency (EASA) has issued a comprehensive Notice of Proposed Amendment (NPA) that will affect not only European pilots all pilots wishing to operate within Europe. The Flight Crew Licensing NPA covers every aspect of pilot licensing and training. While most of the provisions of this proposal affect Europeans, all pilots who wish to operate a foreign registered aircraft based in Europe must have their existing pilot license "accepted" by EASA authorities. Unfortunately, this acceptance process requires a complete skill test, an air law and human performance exam, fulfillment of EASA type and class rating experience requirements, a Class 2 ICAO medical certificate and at least 100 hrs time in the aircraft category for the privileges sought.

In comments to the EASA regulatory docket IAOPA alleged that these requirements do not constitute acceptance, rather they are a total re-testing, equivalent to the initial issuance of a pilot license. This acceptance process will impact thousands of pilots who either operate under a foreign pilot license or will request acceptance of a foreign license. Some estimates to accomplish this procedure exceed €1000 per person.

The IAOPA Secretariat noted in its comments, "All of the above requirements indicate that the concept of acceptance in the spirit and intent of ICAO Annex 1 is not possible under the proposed rules. While ICAO provides no detailed guidance regarding this process, many States require just the presentation of a current pilot license and medical certificate and, perhaps, a brief air law examination for the issuance of a

new State certificate. Under the proposed rules a near-complete re-issuance of the PPL license will be required for third country pilots.

"If a State has issued a license and medical in accordance with ICAO Annex 1, that license should be sufficiently similar to the accepting State's requirements (EASA) to preclude the excessive procedures cited in [the NPA]. ICAO standards and recommended practices, agreed to by all signatory States, are designed to facilitate international air transportation among signatories. EASA is apparently ignoring this concept with its draconian acceptance process.

IAOPA noted that it strongly opposes the foreign private pilot license acceptance process proposed in this NPA. Rather, a valid third-country private pilot license should be readily 'accepted,' by EU State authorities with few additional requirements.

IAOPA also stated that the issue of validating a foreign private pilot's license on a temporary basis to enable a pilot to act as pilot in command of a European State registered aircraft is apparently not mentioned in this NPA. If that is true the validation standards and process will be left up to member States' aviation authorities, which would seem to be at odds with the intent of the proposed extensive acceptance process.

### **IAOPA Comments on ICAO WRC-11 Positions**

Every four to six years the International Telecommunications Union (ITU) meets to determine how to reallocate the electromagnetic frequency spectrum. While seemingly a vast number of radio frequencies are available, commercial demands on this spectrum has created a growing scarcity of communications channels to be available. This means that aviation interests, among others, must increasingly compete for these scarce resources.

The next World Radiocommunication Conference (WRC), to be held in 2011, is set to reallocate these frequency assignments. ICAO will act as an observer/advisor at the WRC, attempting to obtain and retain frequency spectrum essential to safe and efficient aviation operations worldwide.

ICAO recently released its WRC-11 draft positions document for comment. IAOPA has responded, commenting on a number of specific provisions in the ICAO document, also providing a general philosophy for general aviation spectrum management as follows:

"Traditionally, the spectrum interests of personal transportation and small aircraft segments of general aviation have been relatively elementary, centered on basic voice communications and ground-based radio navigation systems. With the advent of satellite-based CNS and elementary data link our interests have widened to include those useful and safety-linked systems. Yet, our dilemma regarding new technology continues to center on cost vs. effectiveness/efficiency of emerging technology devices. While the full range of modern CNS devices may all contain some marginal benefit for general aviation, the costs associated with those systems are often prohibitive for the small aircraft owner/operator. What may be an ideal system for a large airliner is frequently an economic impossibility for aircraft owner/operators who pays for system upgrades out of their own personal funds.

"Therefore, we must take a very selective approach when embracing new or significantly altered devices employing the electromagnetic spectrum. A good example of this is the Global Navigation Satellite System (GNSS). Early GPS receivers were largely unaffordable for general aviation but showed great promise. As receiver and integrated database technology progressed rapidly the devices became more affordable and useful. Significantly, the increased safety and utility aspects of an integrated GPS/database system became a prime driver in the near-universal embrace of GPS by the general aviation community. However, integrated GPS systems certified for IFR enroute and approach purposes are still beyond the reach of many general aviation aircraft owner/operators."

The document containing all of IAOPA's comments may be viewed in the Current IAOPA Activities section of the IAOPA web page at [www.iaopa.org](http://www.iaopa.org).

*Affiliates should work with their national communications and aviation authorities to understand existing and emerging requirements and work to ensure aviation's, in particular general aviation's, needs are adequately accommodated. IAOPA will publish frequency allocation issues as they become known over the next two years. 2011 may seem like it is far into the future but the amount of coordination and negotiation required to provide a coherent proposal to the WRC often takes many years to accomplish. The International Council of Aircraft Owner and Pilot Associations represents the interests of more than 470,000 pilots and aircraft owners in 66 countries. Formed in 1962, IAOPA is dedicated to promoting the peaceful uses of general aviation and aerial work worldwide.*

*IAOPA eNews is published monthly by the International Council of Aircraft Owner and Pilot Associations for the use of its affiliate members in representing and advocating general aviation and aerial work interests worldwide.*