



## European Powered Flying Union

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### EPFU News Flash No. 50, November 2017

Dear Readers

This News Flash brings you information on the “8.33 kHz topic”. It also corrects a part of my text printed in the October issue dealing with RMT.0609, RMT.0610 SERA Part C, NPA 2014-05, containing a mistake in my transcription, this part is now presented in green italics. It also clarifies the actual state of the art of RMT.0657 Training outside Approved Training Organisations (i.e. at Declared Training Organisation...) NPA 2015-20, and, if may write so, installs a light at the end of the tunnel named RMT.0678 Modular light aircraft pilot licences.

**8.33 kHz: “Anything clear today?” I asked recently. Julian Scarfe, member of the board of Europe Air Sports was one of the panellists of the workshop held at Brussels on 27/10/2017. Here follows his report on the event, many thanks to Julian for this contribution!**

“After an introduction by Maurizio Castalletti, head of the Single European Sky section of the Aviation Directorate, the network manager, Eurocontrol, gave a summary of progress in implementation of the conversion of 25 kHz channels to 8.33 kHz, against the backdrop of a 31 Dec 2018 deadline for states to convert. Of more than 9000 total frequency assignments, only 2055 have been converted to 8.33. There 3331 planned for conversion in 2018, 2656 are the subject of exemptions notified by states, and there is no plan known to the Commission or the network manager for 1067 assignments. The network manager’s model suggests that provided the conversions take place as planned, there will be enough capacity in the system to satisfy demand.

In the first panel session, Air Navigation Service Providers such as LVNL, NATS, DFS and Avinor gave an account of their progress. In the Netherlands conversion is almost complete. At the other end of the spectrum, Norway has no experience with 8.33 conversions, and does not intend any, which is manageable because Norway is at the edge of Europe where demand for frequencies is limited.

In the second panel session, NAAs and stakeholders discussed exemptions. Some of these exemptions are subject to an impact assessment by the network manager, and the Commission has not yet accepted all the states’ plans. The Netherlands intends exemptions only for state aircraft, using UHF channels instead. By contrast, France intends to convert over a longer period, with a little over 50% completion by mid-2019, and 170 assignments planned between 2022 and 2026. It therefore intends exemptions for users from the equipage requirements, and estimates about 30% 8.33 equipage in its sports and recreational aviation fleet. We also heard from the radio manufacturer Funke, which has raised production levels significantly and has supplied more than 11,000 8.33 radios to the European GA fleet.

In the third panel session, on ensuring a harmonized transition, NAAs and airspace users were represented. Julian Scarfe, on behalf of EAS, challenged the assertion that full conversion is required, arguing that a significant proportion of frequencies can be retained on 25 kHz without significant impact to the overall network. Others, like Belgocontrol, are concerned about the safety consequences of having aircraft incapable of 8.33 operate in an environment where there are a majority of 8.33 channels. Michael Erb of IAOPA-EUR mentioned the failed attempt to get INEA co-funding (20%) for 8.33 airborne equipment in 2016-7, and the Commission assures us that funding in the current 2017-8 call should be possible, for those



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aircraft that may be able to use exemptions to equip after the 31 Dec 2017 deadline for airborne equipage. In summary, the Commission acknowledged that there are many lessons to learn from this project. Poor information on states' plans has made it difficult to take a harmonized approach across Europe. There is a realization that full conversion of even those planned frequencies by the end of 2018 is unrealistic. It intends to monitor implementation, with quarterly reports by the network manager, and escalate where necessary through the Single-Sky Committee. There is however no intention to amend the regulation to extend deadlines, either for airborne equipage (end 2017) or conversion of frequencies (end 2018). Another workshop is intended in May 2018.

There was general agreement that better harmonization of exemptions is required, to help both airspace users and the network manager, but no mechanism was proposed for this harmonization, other than improving dialogue. It is disappointing that we have reached this point seven years after the work to formulate the VCS regulation. Leaving exemptions to individual states was inevitably going to lead to the chaos we have now. EAS remains convinced that full conversion to 8.33 by 2018 is not necessary to provide sufficient capacity, as the Commission's apparent acceptance of some states' exemptions has demonstrated. Had a more structured and harmonized approach to conversion been taken, we would have been able to deliver a greater benefit at a lower cost to all."

### **RMT.0609, RMT.0610 SERA Part C, NPA 2014-05 of 18/2/2014**

The second paragraph of my text on Opinion 04/2014, Regulation (EU) No 2016/1185 was not clear. It has been published on 16/12/2014. Approval followed in May 2016, first part's implementation in August 2016. The last part entered into application on 12 October 2017. The part in question is now printed in green:

- 1) States can allow shorter VFR flight plan filing times;
- 2) *SERA.13001 „Operation of an SSR transponder“ is now:*
  - (a) *When an aircraft carries a serviceable SSR transponder, the pilot shall operate the transponder at all times during flight, regardless of whether the aircraft is within or outside airspace where SSR is used for ATS purposes.*
  - (b) *Pilots shall not operate the IDENT feature unless requested by ATS.*
  - (c) *Except for flight in airspace designated by the competent authority for mandatory operation of transponder, aircraft without sufficient electrical power supply are exempted from the requirement to operate the transponder at all times.*
- 3) ICAO phraseology added (mostly in AMC);
- 4) Compulsory English use **at largest** international airports;
- 5) Handsigns from the flightdeck to the marshalls.

Please refer to your local/national publications for full clarity.

### **RMT.0657 Training outside Approved Training Organisations (i.e. at Declared Training Organisation...) NPA 2015-20 of 18/12/2015**

At the October 2017 EASA Committee, the new rules on Declared Training Organisations were voted through. They will apply from 8 April 2018, though a derogation allows registered facilities to continue operating until 8 April 2019.



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### **RMT.0678 Modular light aircraft pilot licences**

This is the vital part of EASA's Executive Summary as regards the Modular LAPL, copied from Opinion 08/2017, published on 23/10/2017: «The objective of this Opinion is to address a proportionality issue related to the introduction of the option to follow a modular training route in order to obtain a light aircraft pilot licence (LAPL) pursuant to Annex I (Part-FCL) to Regulation (EU) No 1178/2011 (the 'Aircrew Regulation').

Article 12(2a)(b) of the Aircrew Regulation allows for an opt-out from the requirements of Part-FCL, Subpart B until 8 April 2018, therefore, most EASA Member States (MSs) still apply their national licensing requirements to issue national licences the privileges of which are similar to those of an LAPL. Some MSs' national licensing requirements provide for a 'modular training route' to issue a basic licence: after having successfully completed a particular training module, an applicant is issued with a limited ('modular') licence with respectively limited privileges (e.g. only for local flights without passengers). Thus, module by module, the applicant may gradually fulfil the requirements for obtaining a licence with further privileges, comparable to an LAPL pursuant to Part-FCL, Subpart B. However, Part-FCL does not provide for such modular training routes, and MSs will no longer have the opt-out option to use those modular training routes for the issuance of such licences as of 8 April 2018.

Considering both the positive effects of such modular training on GA in said MSs as well as the objective to promote GA through the GA Road Map, this Opinion proposes to amend Article 4(7) of the Aircrew Regulation in order to introduce the option for MSs to follow a modular training route for the issuance of an LAPL. Applicants for and holders of such modular LAPLs will need to comply with all Part-FCL requirements except that the MS may tailor the flight training and skill test to the limited privileges of the licence. These limited privileges of such a modular-LAPL holder will also be restricted to the territory of the issuing MS. Modular-LAPL holders will be entitled to obtain the full LAPL after having successfully completed the full flight training and skill test as required by Part-FCL.

The proposed changes are expected to increase efficiency/proportionality by allowing MSs to continue with modular training routes for LAPLs. This will promote leisure and sport aviation by providing cost-reduced training modules followed by LAPLs with respective limitations.» The «link» to the full text:

<http://www.easa.europa.eu/system/files/dfu/Opinion%20No%2008-2017.pdf>

### **RMT.0698 Revision of the operational rules for sailplanes**

The Terms of Reference (ToR) were published on 26/4/2016, no NPA was published, a dedicated workshop was arranged by the Agency. Opinion 07/2017 was published on 29/8/2017. Julian Scarfe of Europe Air Sports comments: "Thanks to the support of a number of key member states to whom EAS had explained the importance of the issue, the deadline for the implementation of Sailplane and Balloon flight crew licensing rules has been extended until April 2020. This will allow time for the project at EASA on the development of proportionate rules for Sailplane and Balloon flight crew licensing to deliver». This is the link to the Opinion:

<http://www.easa.europa.eu/document-library/opinions/opinion-072017>



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## **NPA 2017-15 Non-ETOPS operations using performance class A aeroplanes with a maximum operational passenger seating configuration of 19 or less, Repetition**

was published a few days ago, the deadline for submission of comments is 3 January 2018. I think this is not exactly the core area of our flying, but I shall read the text and keep you informed about my next steps. This is the «link» to the document:

<http://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-15>

My suggestion today: We do nothing.

### **2018 Annual General Meeting (AGM)**

A few days ago I informed you about the date (2-4 February 2018) and the location (Paris) of our 2018 AGM. This week on 2 November 2017 we hold a board meeting at Paris to prepare this AGM. As a result of it you will get more information to allow enough time for your travel arrangements and your proposals you may wish to send to the board. You will read us very soon.

Picture of the Eiffel Tower, by T. Demand,  
via Pinterest, many thanks.



Kind regards

René Meier

CH-2540 Grenchen, 1 November 2017

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