

AN UPDATE FROM RATE ONE AVIATION

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CONVERTING YOUR THIRD COUNTRY or FAA IR TO AN EASA IR

We are going to tell it how it is from our perspective even if that is uncomfortable or inconvenient for some FAA IR holders. It's about time those affected by the need to convert their ratings got their heads out of the sand and made firm plans to get an EASA IR.



There isn't going to be more information. There isn't going to be some magic easy solution. Everything you need to know is in the public domain. There is not going to be a further extension of the period of grace and the BASA is not going to provide a better alternative. In 10 months you are going to be flying illegally. Indeed, since most countries in EASA have not bothered to apply for the derogation, many FAA IR holders are already flying illegally.

Maybe you don't care about this and see it in the same category as going a little over the speed limit when driving. That's your privilege and we very much doubt if you are going to find that there will be EASA Blackhawks shooting you down or even any ramp checks.



The second myth is that all we FAA IR holders are sky gods who could easily pass the EASA skill test. Well the truth is (and there is evidence from the old conversion process to back this up) that without preparation only 10% will pass. Perhaps 30% will need five or six hours instruction and the majority will take 15 or more hours training. A very few, especially older pilots, will struggle and need a lot of training. Everyone will pass in the end but it will take effort.

There are two more factors to take into account. Those, (mainly Cirrus owners) who have not fitted an ADF or a DME cannot use their aircraft for tests. Presumably they are not bothered about flying illegally they have been doing so for a decade. It would seem that the NAA's don't care either since there has been no enforcement action. It is possible to take the test legally without an ADF but this will require longer transits and perhaps some other modest inconvenience. This is because there are very few approaches where the NDB is not part of the missed approach procedure. It is simply impossible to fly a legal instrument approach in Europe without a DME since GPS overlay approaches were never legitimised.

Secondly think about examiners. They have thousands and thousands of hour's experience. They have passed endless tests. They have paid and continue to pay significant fees to maintain their ratings. The privilege this has earned them can be lost very easily if they break the rules. At the moment they get paid about £250 for a skill test. Why on earth should they risk anything for a pilot

who comes from outside the system and who, at best, might return to them annually for revalidation flights? Then there are not many examiners available and even fewer who know anything about third country licences. They are now going to be exposed to testing on less common aircraft types possibly fitted with less common equipment. The current rules require them to be capable of being PIC during the test. Owners of some types, typically those that require a type rating in Europe but not in the USA will struggle to find instructors never mind examiners at any price.

The UK Test Procedure

The CAA have come good and made the general situation for conversions about as easy as it can get while being entirely compliant with the EASA legislation. They made a bit of an error with their guidance first time round but their second go is spot on. You don't need to use an ATO, you don't need screens, you don't need an ADF, you can contact an examiner direct and you can test outside UK airspace. There is some further potential delay while they brief examiners on the scope of the aural test and the weeks are passing by.

The Reality

If you are thinking of taking advantage of this relaxed system and believe going it alone will work then good luck. We think you are in for a painful surprise assuming you can find an examiner at all much less one that will test you. Did we mention that the CAA has not yet published an examiner list much less a list with all the aircraft types and equipment on which the examiners are current?

The BASA Bilateral Talks

Those who think that the BASA is the knight in shining armour coming to rescue them should think again. The very best that it might offer, if the results emerge at all this year, is that the test would be a revalidation test rather than an initial skill test. That would make more examiners available although not that many more. Traditionally the revalidation test, although it follows the same format as an initial test, is significantly more relaxed. These revalidation examiners still answer to the CAA and are still subject to audit. It seems unlikely to us that the CAA would let such a situation pass without yet more time consuming consultation, general agonising over minutia and issuing of guidelines. Yet more delay will ensue.

More time Extensions

Maybe you think that EASA will allow a further delay even though this legislation has been in the pipeline for about a decade with pilots assuming it would never happen. Our MD presented at an EASA conference recently and listened to the guy from the European Commission (EASA's boss in effect) explain that a further delay would require parliamentary approval. This was possible but not something they were enthusiastic about. The rather big 'but' is that the time taken, even assuming the parliament agreed to any proposal and there were no holdups, would be 6 months.

Doing the test outside the UK

Maybe you can do all this really easily in Transylvania by giving some local examiner with vampire tendencies a few drops of your blood. We have spoken to some 12 NAAs. Their attitudes fall in the range 'we will get round to offering a conversion procedure in due course' via indifference to outright hostility to the process. If you succeed in achieving a cheap easy skill test outside the UK this then please share your experiences so the whole pilot community can benefit.

The ATO's will string this out to make money

We doubt many ATOs will even want to be involved. This is a messy one off situation. It requires knowledge of the FAA system that not all IR approved ATO's will have. The larger ATO's focussed on airline cadets are highly unlikely to want to be diverted from their main business. At Rate One Aviation, while we enjoy the flight training, we are certainly not looking forward to the hours of

administration that will be involved. Frankly, but for fact that that this need has coincided with a slack period, we would probably not be that interested ourselves. Our CBM IR courses cannot operate till the new theoretical knowledge courses are in place so we currently have spare resources. It may be that by early 2015 we will be unable to support FAA IR conversions.

Independent Instructors

There may well be some excellent freelance instrument instructors available but we cannot quite see how they can be up to speed on the IR skill test system. For this to be the case they would have to be working within an ATO (in the current system). This is not to disparage their instructing skills. As we keep pointing out this is not just about instrument flying. It's about finding the least painful way through administrative procedure, and then delivering the very particular skill set the test demands.

Let Get on with it

Here at Rate One we are fed up with waiting. If you come to us for our assessment we will proceed as follows:-

We will check and sign off the following items. We then provide a certificate which you can hand to the examiner who we will find and brief. The examiner is always free to ask any questions they like and is also free to ask you to show him any reasonable manoeuvre or procedure. However they are only human. We suggest that if we provide an honest confirmation as to your TK knowledge and to the legality of your N registered aircraft and FAA license then they will treat you as they would any normal UK candidate. **HOWEVER WE CANNOT AND DON'T GUARANTEE THIS.**

We ask you to provide the following for us to check. In some cases we will ask you to bring paper copies for us to keep on file.

Aircraft Documents

1. C of Airworthiness
2. C of Registration
3. Aircraft Flight manual and supplements
4. Radio Licence
5. Weight and Balance schedule
6. VOR checks
7. Maintenance certificate annual or 100 hour check
8. Insurance cover including instruction and testing
9. Interception procedures

Pilot Licence

1. Licence current (FAA and EASA)
2. Medical EASA + FAA needs to be current at time of test. Any audiogram issues resolved
3. FAA IR
4. FAA MEL / SEL as appropriate
5. High performance sign off (>200 HP)
6. Complex sign off (retractable flaps and or VP prop)
7. High Altitude sign off (unlikely only over 25,000 ft)
8. Log book with 50 hours PIC IFR time
9. IFR Currency satisfied 6 approaches, holding & intercepts last six months
10. BFR current

Other

1. Current GPS data base
2. Fire extinguisher in date
3. First aid kit in date
4. 2 Check lists
5. No throw over yoke
6. Brakes on P2 side

TK

We will give you a short written test in flight planning, meteorology and air law. This is not to catch you out. It simply demonstrates that you have the most basic operational knowledge needed to fly IFR in European airspace. Depending on how you do in the written test and how long you have been flying IFR in Europe we might need to refresh your knowledge with an hour or twos discussion. We then follow this up with a second written test. The sole aim is to reach the point where we can honestly say your grasp of useful theoretical knowledge is comparable to that of someone who has just passed their IR skill test. **Please note this attestation has no legal force. It is not based on an official system or permission.** However we think it will work and that providing you don't make a hash of the pre-flight preparation common to all EASA skill tests, the examiner will not find it necessary to ask additional questions. To repeat what has been said elsewhere an EASA examiner has the right to ask anything. In reality, is it very rare indeed for them to do so unless the candidate in some way indicates to them by their attitude, preparation or indeed performance in flight that their knowledge is lacking.

Assessment of flight skills

We will also assess your current skill level relative to the IR test requirements. This will start with simply talking through a typical skill test profile. In some cases it may not even be necessary to fly. We will be able to reach an agreed position just by talking about what the skill test involves. Then we can move immediately onto your first training flight. However, if you or we think it will be valuable we will fly an assessment using an abbreviated skill test profile.

Training

This will obviously be entirely individual. It can be on your own aircraft. Rate One Aviation is one of the relatively rare ATO's approved to train on effectively any aircraft that does not require a type rating. Alternatively you can use our aircraft or simulator. In some circumstances a combination of the simulator and your own aircraft may be most appropriate. If you prefer we can recommend training some or all of which you can take with another ATO. This might suit if, for example, our Gloucester location is inconvenient for you.

Candidates with non UK licences

We will need to talk about this on an individual basis. In theory at least any EASA State should accept a skill test in another state. However the examiner will need to be approved for tests by the state holding your medical. In theory this is easy to obtain but in practice some states erect administrative hurdles. We may need to ask for a modest deposit in advance if we need to arrange for an examiner undergo qualification for a new state

The skill test

There is a long and slightly tedious description of a typical test route at the end of the note. This is what a normal candidate is expected to deliver. The avionics set up relates to our own aircraft but it will give you an idea of what is expected. Our best guess is that the examiners will be lenient with FAA candidates to the extent they will recognise your real world experience and will not expect

checks and procedures to be quite as anal as is normally the case. They might even turn a momentary blind eye if your flying has been generally good but there is the odd excursion outside the normal performance limits. However they will not under any circumstances turn a blind eye to busting minima /cleared levels or exceeding flight tolerance and then doing nothing to correct the discrepancy for extended periods.

On the other hand they can reasonably expect experienced IFR pilots to be better at RT and in managing the flight, situational awareness and prioritising resources than the normal inexperienced candidates. If your flying is sloppy and you do not demonstrate a sound grasp of the basics such as Aviate /Navigate/ Communicate and Power / Attitude / Trim then its 'hello retest'. It is surprising how many experienced pilots still cannot do a decent landing or remember to use into wind aileron in a cross wind take off. You won't fail a skill test on this sort of thing alone but you cannot expect a degree of leniency in the minutia of the CAA concept of a skill test and then not deliver on basic airmanship.

Rate One Aviation's Edge

We can talk to the examiners in advance and we won't use examiners (more than once!) who don't seem to us to have the right attitude. Don't misunderstand this. They will fail you if you make serious errors and we fully support them in this. We don't use the same examiner for more than few tests to avoid the relationship getting too cosy. All the stories of people failing for minor discrepancies are, just that, stories. The examiners are, almost without exception, good people. We give them a briefing note in advance explaining our SOPs. These SOPs are based on our CAA approved manual. If they don't like some minor item they talk to us and we adapt. If it's something specific to one test then they brief the candidate on the day. If they really think we have got something wrong then they are asked to contact the CAA to get them to change our approval. Let's say it again. This is not about an easy test. It is about having a predictable way of delivering the standard that the test requires with the minimum of emphasis on things that are irrelevant in everyday single pilot operations.

Skill test and the real world

The skill test has been almost unchanged for decades and its content has diverged from real world practice especially as it affects the single crew operation. Of late there has been some informal movement to address this. It is also important to understand that much of the resistance to change comes from the commercial flight schools not the CAA. Some schools are quite happy doing this the old way. If this way is acceptable to the airlines, who are in a sense their ultimate customers, then that is their business and it's hard to argue against the logic.

Small changes are arriving but their acceptance is not universal. There is more use of the autopilot, more use of GPS, less emphasis on single needle tracking and a somewhat less obsessive approach to precision in the hold. That said you are still expected to deliver a drift corrected hold and fly inbound within 5 degrees for a reasonable time. To date you have not been able to use your GPS with the HSI set on the inbound track but given that this will now be the only navigational display available on some aircraft we suspect even this limitation will soon be abandoned. Overall, Rate One Aviation has been at the forefront of pushing to encourage modernisation of the skill test within the basic EASA framework.

Screens

These are no longer required. A hood or foggles are OK. Rate One Aviation has also been instrumental in bringing about this change.

CAA Audit

The CAA staff examiners always have the right to take over any test. There are now only two or three of them so it doesn't happen often but it will occur from time to time. They are perfectly fair examiners and while such an audit is hardly a morale boost for the candidate neither should it make any significant difference to the outcome or cost of a skill test.

Autopilots

Autopilots are now allowed other than for flying the procedures and the hold. Autopilots can be a bit of a two edged sword if their use has led to you be rusty with your hand flying. We will treat this on an individual basis but suspect that for many, the best policy will be to hand fly the whole flight other than when level in the airway. If you are going to use the autopilot you must understand how to test it and how to use all its functions especially the multiple ways of disconnecting it in an emergency

ADF

If you don't have one fitted then it is possible to test providing we can find precision and non-precision approaches that can legally be flown. To the best of our knowledge this is only possible in the Channel Islands or Northern France. There are airfields such as Southampton which have VOR based approaches but they are not necessarily airfields that always accept training and exam flights. This is another area where an ATO expertise in knowing what can be made to work saves time, money and grief.

If you have a fixed card ADF as opposed to an RMI then this makes the test significantly harder.

GPS

You can use GPS navigation and RNAV is an option for the non-precision approaches. You will need to turn off WAAS so that there is no advisory glide slope. Yes that is pretty stupid but don't shoot the messenger. Your database will need to be completely up to date.

Advance Equipment

If your aircraft has a stormscope, radar, pressurization etc. then a working knowledge is expected. This extends to things like emergency gear lowering and feathering mechanisms where individual aircraft types have quite different systems.

Cost

Our prices are to be found on the website. The assessment is, for the moment at a bargain price. As we explained above resources are limited across the industry and you all know what happens to prices when supply is reduced. At the moment the assessment charge is circa £300. It takes most if not all of a day. A normal full days training for an IR candidate earns Rate One Aviation about £700 We think it unlikely that assessment prices will remain stable.

Summary

This note has given you all the facts. No one knows more about this strange niche in instrument flight training than Rate One Aviation. Our Managing Director quite literally introduced this conversion method into the EASA legislation and argued over a five year process for keeping it as simple as it is. Obviously it is not welcome even so but without this effort you might be doing a 40 hour course and the full set of written theoretical knowledge exams. Very few pilots can claim they are as sharp and current as they would like to be. This training will have some benefit and you will emerge a better pilot than when you started. We would not claim the training focus is ideal nor is it the best possible value training per £ or € spent. However it is the best we have. If you want to continue legally flying IFR in Europe then we suggest you get on and sort this out soon.