



Proposal of change of AMC1 BOP.ADD.315(b) Recurrent training and checking

Czech Balloon Federation strongly encourages European Ballooning Federation to propose to EASA changing of the wording of AMC1 BOP.ADD.315(b) Recurrent training and checking. Currently an examiner is required to conduct the operator proficiency check what in our opinion creates unnecessary burden to the operators with no benefit to safety and it does not meet the goal set by BOP.ADD.315 (b).

Thus, Czech Balloon Federation proposes to change the AMC1 BOP.ADD.315(b) wording as follows:

PROFICIENCY CHECK

~~(a) in case of flight crew members engaged in commercial passenger ballooning, include the content of the proficiency check for the commercial operation rating specified in AMC1 BFCL.215(d)(2)(i) (AMC & GM to Part BFCL); and~~

The operator proficiency check shall be conducted by the flight operation manager nominated in accordance with BOP.ADD.040 (c)(1).

JUSTIFICATION

1. BOP.ADD.315 (b) says that the operator proficiency check should cover “the relevant aspects associated with the specialised tasks described in the operations manual“. We believe that it is impossible for an examiner to understand the operation manual and relevant aspects of the operation procedures of every balloon operator to the level that he can properly conduct the check. Flight operation manager nominated by BOP.ADD.040 (c)(1), who sets and implements the flight procedures, understands the best the specific aspects of the operator’s operation procedures. He is the best person to decide whether the pilot understands and follows the operator’s flight procedures correctly and conduct the operator proficiency check.

2. It is generally considered that only one operator proficiency check is required even when a pilot flies for several operators. However, to our knowledge, there is no rule which supports that. Moreover, we believe, that operator proficiency check should be valid just for one specific operator as the “universal” operator proficiency check would not cover differences between different operations (what is in fact requirement of BOP.ADD.315 (b)). In theory a pilot can conduct the operator proficiency check for example in Spain and then fly for 24 months in Sweden in totally different conditions and flying area, with different balloons and equipment following different operation procedures. This is not safe! The flying procedures can vary a lot in between operators!

3. Strictly following the current rules, the pilot must conduct the operator proficiency check with every operator he wishes to fly. Flying for several operators during the flying season is quite usual. Operators are very often helping each other in sharing of the pilots, there are



freelancers' pilots. As we see no rule which says "only one operator proficiency check is valid for all operators" we Český balonový svaz, Šeránkova 4, Brno 616 00, tel. +420 511 111 605, fax +420 511 111 605 <http://www.balonovysvaz.cz> e-mail: info@balonovysvaz.cz assume, that a pilot must be checked every time he flies for a new operator. This can easily overwhelm the examiners, creates necessary burden to the operators and most importantly this has no benefit to the safety.

4. Ability of a pilot to perform commercial operation and commercial passenger ballooning operation is fully covered by BFCL.215 (d)(2). When a pilot fulfils the requirements set by BFCL.215 (d)(2) (in case of a new pilot BFCL.215 (b)) he/she should be considered as capable to perform commercial pilot duties. The operator proficiency check should not be focused on the pilot skills in general but to operator's specific procedures. There is no need for an examiner for that.

5. If the operator proficiency check must be conducted by an examiner there is no practical use of BFCL.215 (d)(2)(ii). Thus, requirement of an examiner for the operator proficiency check creates inconsistency between Part OPS and Part BFCL. We believe that BFCL.215 (d)(2)(ii) creates perfect sense, ensures appropriate level of safety, and follows well established practice in many EU countries. Thus, BFCL.215 (d)(2)(ii). should be kept as it is and requirement of an examiner for the operator proficiency check should be deleted.

6. Moreover, no rule specifies which balloon class or group should be used for the operator proficiency check creating another inconsistency between Part OPS and Part BFCL.

Conclusion:

Czech Balloon Federation strongly believes that the proposed change of AMC1 BOP.ADD.315(b) addresses all the issues above. We are ready to discuss the topic and perhaps come to another way how to solve the problem. But the rules should not stay as they are. Many thanks for the consideration.

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