

Structure of Part-FCL: Classification System / Identification of Subparts

Finding:

EASA proposes for the EASA-FCL the same Numbering System as JAR-FCL1 and 2: This is a mixture of letters, abbreviations and numbers. Most European countries do not use systems with numbers and letters for the classification of legal text. They use a kind of Decimal Classification. Such a numbering system is used as well by ICAO in Annex 1.

In addition:

The **Letters** for the definition of the Subparts in JAR-FCL and in EASA-t FCL are **not identical** in all cases (7 of 10 - see list below). This will lead to confusions.

Allocation of letters in JAR-FCL1+2	Allocation of letters in EASA Part-FCL	Proposal
SUBPART A GENERAL REQUIREMENTS	SUBPART A GENERAL REQUIREMENTS	SUBPART 1 GENERAL REQUIREMENTS
SUBPART B STUDENT PILOT (A/H)	SUBPART B LEISURE PILOT LICENCE LPL	SUBPART 2 LEISURE PILOT LICENCE LPL
SUBPART C PRIVATE PILOT LICENCE (A/H) – PPL(A)	SUBPART C PRIVATE PILOT LICENCE (PPL), SAILPLANE PILOT LICENCE (SPL) AND BALLOON PILOT LICENCE (BPL)	SUBPART 3 PRIVATE PILOT LICENCE (PPL), SAILPLANE PILOT LICENCE (SPL) AND BALLOON PILOT LICENCE (BPL)
SUBPART D COMMERCIAL PILOT LICENCE – CPL(A/H)	SUBPART D COMMERCIAL PILOT LICENCE CPL	SUBPART 4 COMMERCIAL PILOT LICENCE CPL
SUBPART E INSTRUMENT RATING (A/H) – IR(A)	SUBPART E MULTICREW PILOT LICENCE – MPL	SUBPART 5 MULTICREW PILOT LICENCE – MPL
SUBPART F CLASS AND TYPE RATING (A/H)	SUBPART F AIRLINE TRANSPORT PILOT LICENCE ATPL	SUBPART 6 AIRLINE TRANSPORT PILOT LICENCE ATPL
SUBPART G AIRLINE TRANSPORT PILOT LICENCE – ATPL(A/H)	SUBPART G – INSTRUMENT RATING – IR(A)	SUBPART 7 INSTRUMENT RATING – IR(A)
SUBPART H INSTRUCTOR RATINGS (A/H)	SUBPART H CLASS AND TYPE RATINGS	SUBPART 8 CLASS AND TYPE RATINGS
SUBPART I EXAMINERS (A/H)	Subpart I ADDITIONAL RATINGS	SUBPART 9 ADDITIONAL RATINGS
SUBPART J THEORETICAL KNOWLEDGE REQUIREMENTS AND PROCEDURES FOR THE CONDUCT OF THEORETICAL KNOWLEDGE EXAMINATIONS FOR PROFESSIONAL PILOT LICENCES AND INSTRUMENT RATINGS	SUBPART J INSTRUCTORS	SUBPART 10 INSTRUCTORS
not applicable	SUBPART K EXAMINERS	SUBPART 11 EXAMINERS