

Independent instructors and how instrument flying training could look in the future

Jim Thorpe

Jim Thorpe, an experienced Instrument Rating flight instructor, is deputy chairman and technical specialist for independent aviation association PPL/IR. He is also a member of FCL.008, the European Aviation Safety Agency's specialist working group tasked with developing pan-European instrument flying licence proposals from which EASA's recent NPA 2011-16 was drawn.

The NPA, which is open for consultation until 23 December 2011, details the Agency's proposals for instrument meteorological conditions (IMC) flying for European pilots. The proposals contain a new modular-based training route for IFR pilots which includes an En route Instrument Rating (EIR) and Competency-based IR (CBM IR), reported on in last edition of FTN. The NPA can be accessed via EASA's website: <http://www.easa.europa.eu/rulemaking/notices-of-proposed-amendment-NPA.php>

While the general response to EASA's notice of proposed amendment (NPA 2011-16), detailing changes to European instrument flying licences, has been extremely positive, there does appear to have been some difficulty in understanding how this might work in practice. In particular, questions have been raised about the way an Approved Training Organisation (ATO) and an independent instructor might work together.

The existing system of instrument training was designed around the needs of the airline industry. The current 50 or 55 hour courses were arrived at not by some careful analysis of the needs of an IR candidate but rather an allocation of the remaining hours when all the other boxes for an integrated ATPL course had been ticked. This made it particularly unsuitable for the needs of the private pilot and the NPA was directed towards addressing this issue. Indeed FCL.008 made efforts to avoid anything which might be seen as unhelpful by those involved in commercial training and their belief was that commercial training would continue unaffected. However a feeling seems to have arisen that the proposed system will become the de facto way in which all candidates might attain an IR. In one sense this is a compliment to the NPA but some stakeholders seem to see it as a threat.

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From a flight training school's perspective the situation regarding private pilots wanting an IR is clear. At the moment the uptake of JAA

PPL IRs is negligible so anything that emerges from the NPA is new business and surely to be welcomed. Additionally, there may well be substantial numbers of FAA IR holders who will also now need EASA qualifications. This again is entirely new business.

The negative is the possibility that the reduced compulsory hours requirement, and the use of independent instructors, will take business away from established commercial IR schools. If this were true it implies that it would be possible to pass the IR skills test with less training and that the current number of compulsory hours is excessive. I suspect that most schools would argue strongly that this is not the case and they do everything possible to give candidates the best chance of a first time pass on the challenging IR skills test. To repeat the point, the NPA is not primarily about commercial training. However I do suggest that it offers even more flexibility and it would do no harm for training organisations and regulators to reflect on how they operate. They might do worse than consider if there is any measurable evidence to separate those graduates off highly structured six-week, full time courses in the UK, with all the overheads and costs that implies, with graduates from intensive two-week courses delivered by independent US instructors who visit candidates' home airfields with a desktop procedure trainer.

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Leaving aside these musings, in Europe, even with the proposed changes, there is little doubt in my mind that if a candidate requires an IR with the object of becoming an airline pilot then the best way to go in the future will still be a fulltime course at a specialist ATO. The ATO will have more flexibility in terms of total training time and it may be that exceptional candidates will spend less money and complete the course somewhat quicker. Other candidates will still take 50 /55 hours or even longer just as they do now. It's competence based and there is no change in the situation where an ATO has to sign the candidate off as fit for test. Actually the whole process of the 170A check flight, which students still have to undertake before being permitted to undertake the skills test, seems to me an anachronism from the days when booking CAA exam flights were like finding hens teeth and could only be booked by approved schools months in advance. Why should an examiner not test anyone who is willing to present themselves? Surely it is for the school and the candidate together to make the difficult judgement as to the right moment, taking into account the inevitable trade off between uncertainty and cost pressures.

I have heard several spurious arguments in defence of a fixed training hours requirement. One is that the additional hours impart some general skills rather than just training to pass the test. This seems unlikely; everyone focuses on passing the test and why would they not, given they're paying in the region of £4 a minute for their flying. There is no evidence that the test is matched to the real world skills needed by commercial pilots or private pilots. It is simply a consistent check that candidates have achieved a well defined set of skills, some of which are highly relevant, some less so and some plainly irrelevant. The skills test focus is almost inevitable therefore. In a highly expensive, stressful process with limited relevance to real world needs it is completely rational for most candidates to have ticking-the-box as the main goal.

Another suggested issue is where some of the instruction occurs outside an ATO and there is a resulting lack of training records or audit trails. Again one might reference the USA where an IR test candidate can appear with no records whatsoever beyond normal logbook sign-offs and the theoretical knowledge pass certificate. However, if a training record is seen as vital then this is easy to address by simple paper or electronic duplicate records being held by both

instructor and candidate.

Let's imagine that a commercial IR candidate has some strong reason to want to use a local instructor. Maybe they were a bit cheaper and in a much more convenient location than the nearest specialist school. The potential negatives would be significant. First, they wouldn't be training in the test environment using test routes. Second, they would struggle to find an aircraft with the ideal mix of HSI, GPS, RMI autopilot etc. If they did find such an aircraft it might well differ from the one offered by the ATO they would be using at a later stage. They might well end up having to learn two different sets of speeds and SOPs therefore. All this is hardly likely to increase their chance of a first time pass. And considering the cost of the initial skills test all it might take is a partial pass to wipe out any savings. It seems highly unlikely therefore that any candidate would opt to use an independent instructor in this way.

A viable approach would be for commercial ATOs to encourage a limited number of independent instructors. In effect they would represent a sales force and a broadening of the ATO's geographic appeal. The instructor would do the school's standardisation programme and might

be able to source a local aircraft that came close to matching the school aircraft characteristics. You will note the struggle to create a credible scenario without the full involvement of the ATO. This means it makes it very difficult for an independent instructor using some ad hoc arrangement to compete head-on with a well organised, fulltime commercial school.

The opportunity for other co-operative business models also exists. Perhaps an independent instructor, who believes there is an ongoing stream of business, could take the risk of sourcing a suitable aircraft and develop training routes which match the test route characteristics using an ATO's SOPs. He might also agree with the ATO to use their simulator. In the end, market forces will drive the ways in which the NPA might operate.

Another area for co-operation could be found with the local flying school, presently a

Registered Facility (RF), which will become a 'light touch' ATO under EASA, whatever light touch may come to mean. It might be possible for such schools to enter into formal arrangements with a specialist ATO, making it viable for them to operate well-equipped modern aircraft for differences training, PPL hire, the En route Instrument Rating (EIR) and the IR. It is worth reflecting that the RF will face some challenges in the new system and operating as a light touch ATO is hardly likely to reduce their costs. They will lose their IMC business, other than renewals, and all post-PPL instrument training will require an instructor with a full IR. The EIR will be the most obvious volume replacement business and it will require instructors that a small school might find hard to justify to employ on a fulltime basis. Perhaps competent, well qualified part time instructors, working for two or three schools will be life savers.

Unsurprisingly if we turn to a private pilot wishing to get an IR the role of the independent instructor becomes obvious. Candidates are likely to have limited time and possibly financial constraints, in terms of cash flow timing rather than total cost. They may want to do the course over several years. They may want to use their own aircraft. They might want the instructor to accompany them on business trips. They might want to get an EIR along the way and build some solo IFR experience. In other words, they need flexibility and training tailored to their circumstances and this is where the independent instructor can shine. If asked if this is the most certain, quickest or cheapest way to get an IR the answer is likely to be no. This may not matter, however, since going to a commercial school for six weeks, operating on the ATO's terms, with inconvenient schedules and locations, is simply not an option for those who lead busy professional lives. What these pilots want is a process that fits their needs and takes account of their constraints. It will take them longer and it may well cost more, but on the other hand it will be more enjoyable. And most importantly, it should better prepare them for the realities of single pilot IFR flying which is what they will be using the rating for. The reality is that a newly qualified IR holder, straight from the skills test, is highly likely to have little or no idea of how to cope with real instrument flying. For them there is no ops department, line training or experienced captain alongside. Instead they are left to launch themselves into what can be

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a quite daunting environment. A longer process with more real world exposure and the ongoing support of a local mentor will therefore make that transition less painful. By this process significant numbers of private pilots will once again be able to acquire and use an instrument flying qualification.

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Those negatives faced by a commercial pilot candidate using an independent instructor will not have disappeared entirely for a private pilot, but with different parameters the benefits might also differ. For example, perhaps a private pilot opts to take the test in their own aircraft. It may not have the ideal equipment fit for a skills test but as compensation they will be very familiar with it. (One must hope that the unreasonable UK requirement for aircraft to be approved for test will be abandoned. If its IFR legal then it should be test legal.) Also, it may be that the cost advantages of using an approved simulator for part of the training becomes irrelevant because the candidate will acquire ample total qualifying hours over the extended period of training. Instead the candidate might be advised to do a few hours on an ATO simulator or use some desktop procedure trainer, based on its value as a training aid and not on its ability to deliver less costly training hours. Some of the training flights might conceivably be used for business purposes. While the training value will be less than a dedicated training flight, from a skills test perspective, they will still be very valuable. Ultimately the independent instructor will be a personal advisor able to suggest the best option to fit individual circumstances, and because the NPA model gives flexibility it allows individuals to use that flexibility to their best advantage in their own terms.

UK schools and instructors have the great advantage of the English language. The chance to perfect their aviation English is, and will be, a big draw for many candidates from mainland Europe. We have the disadvantage of the CAA and of VAT levied on flight training. I am not about to go into an anti CAA rant. They are a large organisation and inertia is slowing their ability to react to the huge changes EASA implies. There is a lot they could do to make the UK training industry more competitive without having any affect on the quality of the output. A large proportion of the CAA functions have been taken away and I suggest this implies a more targeted evidence-based style of regulation and inspection. At present, all too often we seem to have solutions searching for problems.

RFs have been very lightly regulated and there have been no serious problems as a result. They will become ATOs so why would they need more regulation to do what they already do satisfactorily? Beyond that, why couldn't a small RF /ATO provide some instrument training? They have been doing it for the IMCR without any apparent difficulty. Why must there be such a large difference in requirements for an approved IR school and an RF? There is no obvious reason why a small school could not deliver some quality instrument training. The exact balance of flexibility and regulation would need intelligent compromises but the proposed EIR and competency-based modular IR (CBM IR) will produce significant new business and could be a catalyst to revitalise that section of the industry directed at training private pilots who want to use their aircraft as a viable mode of transport and not just a hobby.

How might the CAA help? It's not one dramatic thing; it's lots of small factors. Why not just use IFR training goggles like the rest of the world? There is no need for screens which damage the aircraft and arguably reduce the ability of the instructor to maintain a good look out. Why have approved aircraft and approved checklists? If the aircraft is legal for instrument flight and has a manufacturer's approved checklist then that should be sufficient. That is not to say that a different checklist might help a candidate pass the skills test; it's simply that there is no need for an approval process. It's not the CAA's job to consider the financial viability of schools, check their health and safety policy etc. these duties are enshrined in civil law. Why do the operations manual and the training manuals grow into massive tomes with lengthy repetition of material easily found elsewhere? The assumption seems to be that unless the ATO started by rearing the goose from which to get the feathers to make the quill pen with which to write the manuals it is in some way cheating by not working from first principles. Almost all the required information is available in electronic form and there is no reason why the whole training industry could not maintain 80 or 90 percent of the necessary material on a single website with the remaining 10-20 percent being school-specific.

The ideal endpoint should and could be that anyone who wants to do IR training of any sort has easy access to appropriate facilities. In some places this will be specialist commercial IR schools with all instruction conducted in-house. In other instances specialist ATOs will work with non-specialist schools or independent instructors. In some locations clubs or general flying schools will do some multi-engine and IR training; in others it will be independent instructors. No matter what the training process the candidate will in the end be assessed and trained by an approved ATO and then be required to pass an unchanged common skills test. This is an exciting, entirely positive development and it is up to regulators, schools, individual instructors and pilots to make the best possible use of the opportunities.



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