

Consolidated List of Industry Comments

Draft advisory Circular - Monitor Checks on Approved Check Pilots and Advanced Qualification Program Evaluators

Note: ATAC and NATA comments have been amalgamated with NACC's comments.

Comment	TCCA Response
<p>ITEM 1 / NACC</p> <p>1.3(2) Description of Changes:</p> <p>Need clarification on how the ACP M, or the Operator, is made aware if the ACP requires a CASI? Our members do not want to schedule their ACPM and then find out later that a CASI is required.</p>	<p>Section 4.8(1) of the Advisory Circular (AC) has been revised to state that operators must submit a list of planned monitors to TCCA at least 90 days in advance of the month of the planned monitor (versus the exact date). This section also states that TCCA will provide no less than 60 days advance notice if a CASI will be conducting the monitor.</p> <p>For example, if an operator plans on conducting a monitor check(s) in the month of May, the operator must submit the list of "planned" monitors to TCCA by end Jan (indicating that the monitors will be conducted on a "To Be Determined" date in the month of May).</p> <p>In turn, TCCA will notify the air operator by end Feb (60 days in advance of the month) if any of the monitor checks will be conducted by a CASI (for reasons related to risk, performance, or sampling).</p>
<p>ITEM 2 / NACC</p> <p>4.2 Type M Eligibility Requirements:</p> <p>We favor that the Check Pilot eligibility for M authorization be based on his historical performance instead of fixing a minimum number of years of experience and a minimum number of check flights performed. This would be more aligned with a performance-based philosophy.</p> <p>For example, a negative performance could be defined as:</p> <ul style="list-style-type: none"> - Failure to requalify in the past - Repetitive 2s on his/her previous recurrent monitors. 	<p>Historical performance is a factor that will be included in TCCA's assessment of an applicant's suitability for Type M authorization. However, there is a need to include additional qualifying criteria (years of experience and number of flight checks) to ensure that delegates selected for the Type M role have the sufficient depth of experience, knowledge and credibility to adequately perform a standardization role.</p>

<p>ITEM 3 / NACC</p> <p>4.2 Type M Eligibility Requirements:</p> <p>A minimum of five years-experience as an ACP may be a bit restrictive in order to ensure there are enough ACP(M) to cover all the monitors.</p> <p>Propose to clarify that the five years is not tied to current aircraft type. Even if this is not the case the junior fleets may not have enough pilots meeting this criteria? In that case would three years-experience be considered as this would improve not only scheduling flexibility but also the nomination process as 5 years' experience may limit carriers <u>to using the 'most senior' and not necessarily 'most appropriate'.</u></p>	<p>The requirement for five years of experience is not tied to a specific aircraft type.</p> <p>Section 4.2 (Eligibility Requirements) has been restructured to address various concerns, including NACC's concern that the requirement for five years of experience may limit the viability of this initiative. Along with other changes, the experience requirement has been reduced to four years of experience. If an air operator has ACPs / AQPEs that are good candidates for the Type M role but fall short of the experience requirements, CASIs remain available to conduct monitor checks and fill any void until the ACPs / ACPEs have the required experience to apply for Type M consideration.</p>
<p>ITEM 4 / NACC</p> <p>4.2 Type M Eligibility Requirements:</p> <p>We need an interpretation of "Operational Flying Experience". Does this mean holding a PPC, or a minimum number of flight hours?</p> <p>Some of our member's ACP's do complete line flying on a regular basis, but some only fly for currency, would that be considered sufficient?</p>	<p>As stated in the response to item 3, eligibility requirements have been restructured. The revisions in section 4.2 of the enclosed draft of the AC address NACC's concern and provide the requested clarity.</p>
<p>ITEM 5 / NACC</p> <p>4.3 Air Operator Eligibility Requirements:</p> <p>The proposed item specifying the level of compliance "C" is not aligned with SMS philosophy. Again, the performance of the operator must be ensured through PVIs and PIs, which may reveal findings or non-compliance, but an operator that complies through a corrective action plan (CAP) in a timely matter should be considered: compliant.</p> <p>The repetitive findings or non-compliance on same items may be assessed as non-compliant and in turn this would prevent an air operator from being eligible.</p> <p>Please clarify; what ratings other than compliance are there?</p>	<p>This item has generated considerable confusion and it is agreed that it is not entirely consistent with SMS philosophy. The item has been re-worded as follows:</p> <p><i>"No uncorrected or repetitive findings related to pilot training in surveillance results that the Issuing Authority deems to be significant enough to prevent the sponsorship of a delegate for Type M authority".</i></p>

<p>Item 6 / NACC</p> <p>4.7 Qualification / Recency Requirements:</p> <p>Seeking confirmation that only the Type Rating is required, and there is no expectation from TCCA that there are any currency requirements...meaning, an ACP current on the CRJ, holds a type rating on the DH8, may be granted M Authority for the CRJ and also for the DH8?</p>	<p>Correct, there are no currency requirements other than the requirement to possess knowledge of all Special Authorizations that are applicable to the flight check and knowledge of company operations manual, SOPs, etc. Section 4.7 has been revised to incorporate this 'knowledge' requirement.</p>
<p>Item 7 / NACC</p> <p>Appendix A – Monitor Check Guide, Section 1.0 (3):</p> <p>Similar to the ACPM there should be a bullet point outlining that the ACP M is working for the Minister when conducting these checks.</p> <p>Propose consideration be given to adding another bullet point outlining what the ACP M may conduct vs. a CASI.</p>	<p>Both suggestions have been incorporated in sections 4.1(1) and 4.1(2).</p>
<p>Item 8 / NACC</p> <p>Appendix A – Monitor Check Guide, Section 6.3 (1)(e):</p> <p>Need guidance for National Ops air operators who have internal processes in place to advise TCCA of other failures as well.</p>	<p>Suggested guidance has been added to section 6.3(1)(e).</p>
<p>Item 9 / NACC</p> <p>Appendix C – Monitor Grading Matrix:</p> <p>Need clarification on if an AQP carrier would be able to continue using the existing I/E grading guideline or would they be required to grade using the Monitor Check Grading Matrix in Appendix C.</p>	<p>Yes, for AQP existing I/E grading guidelines can be used. There is no requirement to use the Monitor Check Grading Matrix in Appendix C for AQP.</p>
<p>Item 10 / NACC</p> <p>4.2 Eligibility Requirements (Type M):</p> <p>Subparagraphs (b) and (e) mean that a highly experienced ACP without a valid medical (so a sim-only authority) is not eligible to become an ACP(M). Is that deliberate?</p>	<p>Yes, delegates with 'sim-only' authority have been purposely deemed ineligible for Type M authority. TCCA's aim is to ensure Type M candidates possess all the desired attributes for the role, which includes having current industry experience on the line / in the aircraft. Section 4.2 has been slightly modified to accommodate a temporary loss of medical (90 days or less).</p>

<p>Item 11 / NACC</p> <p>4.4(1)(a)(i)(B) Implementation Plan:</p> <p>This is a very small scope for a trial phase. At the 705 working group there were two non-National Operations airlines participating. Since there would only be two fixed-wing operators, would one be excluded? If not, that would then mean that no 702, 703 or 704 operators would be permitted, nor would any other non-National Operations carriers. While I can appreciate the desire to keep the group somewhat small, opening it to ALL of National Operations and only TWO other, non-National Operations fixed wing carriers seems overly restrictive, especially since the intent is to sample a 'broad spectrum of operations'. The non-National Operations sample is a VERY small sample size.</p>	<p>Agreed. An adjustment has been made to the scope / number of operators that will be eligible to participate in phase one (trial phase). The scope has been revised to include all subpart 705 air operators and a total of four operators from the remaining subparts. For subparts 702, 703 and 704 TCCA is not prepared to expand the scope beyond four operators for the trial phase.</p>
<p>Item 12 / HAC</p> <p>4.7 Qualification / Recent Experience Requirements:</p> <p>The challenges associated with scheduling a Monitor Ride with Transport Canada are significant and the requirement to hold a PPC on a single-engine type, when the ACP holds a PPC on a multi-engine type will present a hardship. For reasons that are discussed more fully, below, HAC is suggesting that if the ACP holds a multi-engine PPC, then only a PCC should be required on a single-engine type.</p>	<p>The thrust of the comment is more applicable to the recent experience requirements that an ACP requires to conduct PPCs as opposed to being applicable to the Advisory Circular / Type M initiative. The following points applicable to the Type M initiative are offered for clarity:</p> <p>(1) With respect to the link between monitor rides and the 'requirement to hold a PPC on a single-engine type and multi-engine type, note that the ACP Type M does not require a valid PPC on a single and multi-engine helicopter in order to conduct a monitor check. As stated in the AC in paragraph 4.7(1)(a)(iii), the ACP only requires a "Valid PPC on one of the aircraft types on the ACP / AQPE's Letter of Accreditation", in order to conduct a monitor check.</p> <p>(2) With respect to the 'monitoring' of an ACP Type M that has single-engine and multi-engine helicopters listed on their Letter of Accreditation, only one monitor check is required, either on a single or multi-engine type. [AC - section 4.7(1)(a)(vii)]</p>

<p>Item 13 / HAC</p> <p>4.2(1)(d) Eligibility Requirements (Type M):</p> <p>The current requirement to have a minimum of 40 PPCs may constrain the eligible pool of ACPs. Most helicopter operators only have 5-10 pilots, and it could take four or five years to meet the minimum standard to qualify for the “M” designation. In the face of a significant shortage of experienced pilots in the coming years, it may be timely to revisit this requirement with a view to reducing it, particularly since there are other tools available to assess the suitability of the individual from a safety, experience, and continuing eligibility perspective.</p>	<p>The Type M delegation is intended for industry check pilots that have a minimum of four years of checking experience (revised from five years). Type M delegates will be overseeing and mentoring other delegates and must have the credibility, knowledge and experience to draw from to effectively carry out this task.</p> <p>Given that that the requirement for checking experience has been reduced to four years, a corresponding decrease has been applied to the number of PPCs that a delegate must have conducted as an ACP (reduced to 32 from 40).</p> <p>With respect to HAC’s reference to helicopter operators with 5 – 10 pilots, these operators will not be eligible to participate in this initiative, given that an air operator requires a minimum of five ACPs / AQPEs within the company to be eligible.</p>
<p>Item 14 / HAC</p> <p>4.4 1(a)(i)(B) Implementation Plan:</p> <p>One of our members has commented that they were led to believe that only <i>four</i>, CAR 702, 703, and 704 operators from across the country will be invited to participate in the “M” program – only two of which, we are led to believe, will be helicopter operators. HAC believes that for the program to succeed, there must be greater availability of “M” – qualified ACPs. Our operator-members are dispersed across the country in some of the most isolated areas of Canada, and we believe that the program will only succeed if “M” services are available more locally. We were also led to believe, in spite of the November 1 2018 Effective date in the DRAFT, that the trial period under discussion is 18 months. If this is true, we believe that the trial period for the program should be eliminated altogether. We consider that there are enough embedded safeguards in the system to reduce the risk to very low levels. Our industry segment is in need of significant relief in the near term. An extended trial period will limit the availability of “M” services, under circumstances when we are already experiencing difficulty obtaining timely ACP Monitor Rides.</p>	<p>This initiative is a significant departure from current ACP oversight practices and implementing this program change in a conservative and measured manner enhances the safety and effectiveness of the roll-out. TCCA is confident that there is low-risk associated with offering the Type M initiative to large air operators that have robust quality assurance systems and highly-developed training programs. The 18-month trial phase that limits participation in subparts 702, 703, and 704 is necessary to better assess the risks, prudence and practicality associated with extending this initiative to smaller air operators.</p> <p>With respect to the need to increase TCCA’s capacity to conduct monitor checks on ACPs that support the helicopter industry, this program change will support that effort by reducing the overall volume of monitor checks that TCCA conducts. In turn, this will create spare (CASI) capacity to conduct monitor checks on ACPs that service subparts 702, 703 and 704.</p> <p>It is important to note that TCCA’s objective is not to eliminate CASI involvement in the conduct of monitor checks, but rather to minimize CASI involvement in the conduct of monitor checks that are viewed by TCCA as low-risk.</p>

Item 15 / HAC

4.7(1)(b) Recent Experience Requirements:

We believe that the requirement for [the Type M ACP] to conduct two monitor checks on an ACP in a twelve-month period may be excessive.

As stated in the response to item 14 and 15, this initiative is not intended for small air operators that have do not have five or more ACPs / AQPs within the company. As stated in 4.3(1)(c), the air operator must... “Employ sufficient ACPs (Type A) or AQPEs (Type E), such that each person holding an ACP / AQPE (Type M) authority within the air operator will be conducting monitor checks on no less than four ACPs or AQPEs”.

Based on the above criterion, the requirement for an ACP Type M to conduct a minimum of two monitor checks in a 12-month period is achievable and necessary for competency.