

## Letters to the Editor

### Saving the IMC

Sir,  
While I understand that change is rarely welcomed the recent comments on the IMC /EASA developments were hardly fair. I have been an AOPA member for many years and sit on the EASA FCL 008 committee. The majority of the committee are GA pilots and its members (which include a German AOPA representative) are without exception constructive and reasonable people trying to deliver a structure which works for GA across Europe. EASA has imposed an absolute minimum of constraints and indeed has been very supportive. That they have made this effort even though the vast majority of the European pilot community did not perceive the IMC /IR to be a priority issue.

The draft proposals represent a quite outstanding opportunity for all UK pilots. Those IMC holders who use the privileges of their rating to the full can choose to upgrade to a full IR with quite modest additional requirements. For the majority who use their rating in marginal VFR conditions or instructors who want to fly VFR on top the proposed en route rating will provide for most of their current needs. They will lose approach privileges but gain the right to fly in IMC en route in all classes of airspace throughout

Europe. The future of the FAA IR is not within the committees remit but should no bilateral agreement emerge holders of the FAA IR will be able to gain an EASA IR with modest additional training. All this has been made possible by designing a flexible system in which experience and competence count. Training hours will not be the sole criteria. This is a complex topic which is not best dealt with in sound bites. I suggest that if AOPA presents the facts to the membership in some detail they might be surprised at the positive response. I would be happy to contribute to this process if asked. I must make clear that the above opinions are my own and I have no authority to speak for EASA.

**Jim Thorpe**

*As one who owes his life to the IMC rating, it distresses me that its basic lifesaving purpose is so poorly understood. 1. It helps a pilot maintain control if he inadvertently encounters IMC. 2. It helps him return safely to the earth. It is not there to make life easier, or to allow the holder to set out on flights he or she would not otherwise make. An alternative that does not allow the teaching and practice of instrument approaches is in my view unacceptable and will cost lives.*

*IAOPA is fully behind the idea of making the IR more attainable and always has been; personally I've been watching every attempt to move in that direction down the years and I'll believe it when I see it, especially now that the EC is pressuring EASA to curb its work. But even if TK requirements are dramatically reduced, there is no reason that the IMC rating should be horse-traded for anything*

*else; EASA's rule-makers have made it clear that as a last resort the UK can maintain it as a national rating, and the problems of attaching it to a licence are not insurmountable.*

*I'd be interested to hear what AOPA members think of this situation. Email your views to pat@richmondaviation.co.uk and we'll look at this topic in the next issue of the magazine. – Pat Malone*

### Talking shop

Sir,  
I write in support of Martin Robinson's article urging the CAA to prosecute irresponsible pilots and take away their licenses.

I would ask that we go further and take it on ourselves to report irresponsible and dangerous behaviour. I know that the idea of "shopping" our fellows is alien, but recent events have brought me, sadly, to this conclusion.

Consider the pilot who missed me by 500 feet horizontally (same level) in IMC because he descended well below his cleared level. A one-time error? It turns out that he also flew straight through an aircraft in the hold in IMC – again ignoring ATC instructions. On another occasion, trying to assert what he considered was his right, he headed straight for a large commercial aircraft on a taxiway and blocked it – it had to shut down and be moved by a tug. I could go on with other examples, but the point is that each of the pilots and controllers were different and treated each event as a one-off and did not report it. The person I am talking about is now dead, killed in an aircraft accident.



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I have this harrowing feeling that had I reported my near miss, maybe he would have been taken on one side and advised to calm down. He might have resented it, but I think his widow and children might think differently.

I am requesting anonymity for this letter because I have no wish for the individual or his family to be identified.

**Name and address supplied**

### Closing flight plans

Sir,

Firstly let me congratulate you on a very readable and interesting magazine – *General Aviation*. I find it keeps me up to date with all the latest bureaucracy and there are generally some very interesting articles as well.

But I have to point out that in Tony Purton's article – Do It Yourself – about the new AFPEX flight planning system, there is one mistake that should be brought to the attention of other readers. In the UK, when returning to the destination airfield as stated on the FPL, you do not need to close the flight plan. I suppose no harm will be done to make a phone call, but it isn't necessary, as stated in Safety Sense leaflet 20c. If I am mistaken, then please let me know, as I frequently fly to my own strip where as I understand it, the AFTN take the attitude – no news is good news. All other countries require flight plans to be closed.

You ask for comments on ATSOCAS – I cannot see why the system has been changed as the Basic service is no different to the old Flight Information. Traffic information is still given if the controller isn't too busy and everything apart from the name seems to be identical. So why the change? I have now heard British pilots asking European FISs for a Basic service. Is this supposed to be common throughout the EU or is this another complication?

Other matters I want to get off my chest.

Mode S – I have just been through the Netherlands and read the AICs carefully before leaving, and found that the whole matter of Mode S appears to be in as big a mess as the Labour Party. If I had spent good money replacing a Mode C transponder whilst I fly VFR, I would be very annoyed with whoever dreamt up the scheme. I heard the Amsterdam controller asking someone with mode S to squawk mode C – which is impossible, and he then asked someone to squawk mode S in the Schiphol TMA which is a mode S prohibited area at the moment for VFR below 1200 feet.

ELTs – Surely these are for the pilot and passengers' aid and to help the Search and

Rescue find you quickly. Whilst we live on an island and water crossings have to be made to get to another country, they are going to be no use to me if they are fixed in an airplane transmitting or not from the bottom of the sea. I'll stick with my PLB thank you.

Part M – My chief engineer, who I consider is probably the best mechanic in his organisation, is now practically deskbound because of excess paperwork, meaning that the lads are servicing my aeroplane. So why is it supposedly safer?

RAF LARS transmission quality. I have complained about the quality of transmissions from some RAF stations in the past and have been told that they are sometimes muffled because the controllers have to use their own headsets. I find it annoying when pilots miss parts of the message because of this and sometimes have to ask for the message to be repeated several times. Noise reduction headsets help, but even these don't make up for the poor transmission quality. I notice it particularly from RAF Coningsby. As soon as I change to Humberside, it suddenly becomes crystal clear again.

Apart from all that, I still enjoy my flying.

**Paul Stephens  
North Yorkshire**

### Mind your language

Sir,

Following up my 'Tongues of Fire' letter (*General Aviation*, June 2009), I am now the proud possessor of CAA Language Proficiency – Level 6 Expert. I qualified for this precious endorsement during my last dual check with the CFI of The Pilot Centre at Denham, who is herself a CAA examiner with Level 6 English.

To test the CAA's bureaucracy, I e-mailed [pldlanguage@caa.co.uk](mailto:pldlanguage@caa.co.uk) asking for my language proficiency to be endorsed in the four licenses I hold; PPL, NPPL, Flight R/T Licence and Radio Operator's Certificate of Competence. This is the reply I received:

'With reference to paragraph 1.2.9.4 of Annex 1 to the Convention in International Aviation (ICAO) Annex 1 regarding Language Proficiency, I am writing to advise that our records confirm that the above mentioned pilot has been assessed to hold English Language

proficiency Level 6. This level was granted on 20 May 2009 and is valid for life. At this time the CAA will not indicate the level on the licence but this letter can be accepted as confirmation of the language proficiency level.'

The letter I have received does nothing for me but satisfy my curiosity - and perhaps my pride! Understandably, if the CAA receives too many requests for confirmatory letters they may well start charging for them.

What interests me now is what will happen in March 2011 when the Level 4 endorsements expire (after three years) and renewal is required. Will the CAA remind pilots, or will pilots have to remember to apply for an extension of their Level 4 endorsement? How will this be recorded in the licence and how much will it cost? I'm rather glad I have got my Level 6 endorsement out of the way so I don't have to worry about it any more.

**Tony Purton  
Denham**

### Colour blind

Sir,

I am surprised by an author comment within the brief article: 'FDRs for turbines?' at the foot of page 8 of the June 2009 issue of GA magazine. There is an almost throw-away assertion that the writer regards the appellation 'black boxes' as a misnomer.

On the contrary, I think that the term is indeed very apt to describe the flight data and cockpit voice recorders. As the columnist must surely know, the expression 'black box' started life as a technical expression, referring only to the generalised functioning of a device (in terms of its input, output and any transfer characteristics without any knowledge being required about its internal workings); and not as a reference to its colour.

The same phrase has been turned into the vernacular by the modern media, which is seemingly where the confusion over apparent misnaming originates. This may appear a somewhat trivial point in the grand scheme of things, but the more that efforts are made to explain this relatively simple distinction, the better informed and educated the public will become about matters aviation.

**Tim Sheridan**

*I wrote 'misnamed' black boxes because when I don't, I get letters saying I'm wrong and they're actually orange. Either way, I'm stuffed. – Pat Malone ■*



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