

EASA Q&A - CR EU 2015/340

Should an STDI endorsement be issued for an OJTI when the person has not successfully completed an OJTI training course, but has successfully completed a training course for the STDI endorsement?

The competences to be gained at the end of the practical instructional techniques course for the OJTI or STDI endorsement are the same (see AMC2 ATCO.D.090(a)(1)), but there may be differences in the assessment (see AMC1 ATCO.D.090(a)(3)) and there may also be natural differences between the courses themselves based on the applicants they are addressing.

Is it possible for a Member State to issue an ATCO licence in accordance with Regulation 2015/340 to an individual who holds an ATCO licence/certificate issued by a non-EU State?

Trending

Reg. 2015/340 does not address recognition of ATCO licences issued by non-EU State or the conditions for the conversion of non-EU ATCO licences into EU ATCO licences. The decision to allow such possibility is left to the Competent Authority concerned, which should also define the process for this purpose, including an evaluation of the evidence of previous professional path of the individual to verify if it satisfies the EU requirements.

Should an STDI endorsement be issued for an OJTI when the medical certificate has been withdrawn?

Yes, provided that the ATCO fulfils the requirements set out in ATCO.C.035 'Application for STDI endorsement', or ATCO.C.040 'Validity of STDI endorsement'.

Why is there a difference in the requirements on the responsibility for undertaking assessment of previous competence in ATCO.B.010(b) compared with ATCO.B.001(d) and ATCO.B.005(e) and how should the difference be interpreted? Some say that the assessment could be conducted by a unit training organisation, while others are of the opinion that the assessment and if needed, additional rating training is to be done by an initial training organisation.

Trending

The purpose of not referring to initial training organisations in ATCO.B.010(b) is to leave some flexibility and to allow the possibility also for a unit training organisation to perform the assessment. Recognising that in most cases an initial training organisation would be in best position to perform the assessment of previous competence, it needs to be taken into consideration that training for rating endorsements is often conducted by unit training organisations. As the privileges of the rating endorsements are associated with the rating in question, the unit training organisation could also be suited to evaluate the previous competence. In any case, in accordance with AMC1 ATCO.B.010(b) the assessment should be based on the requirements set out in Part ATCO, subpart D, Sections 2 (initial training requirements).

Having considered the above mentioned, the competent authority should evaluate, which training organisation under its supervision is eligible to perform the assessment of previous competence taking into account amongst others the requirements of AMC1 ATCO.B.010(b).

The result of the assessment of previous competence may evidence that there is a need for a training 'course' to recuperate an adequate level of skills to enable the applicant starting unit training. In this case, it is up to the Training Organisation performing the assessment to decide what the training needs are depending on the results of the assessment of previous competence. This may also include Initial Training, if the gaps identified so require.

Do STDI instructors need a valid English language endorsement in their licences to obtain and to exercise their privileges?

The language endorsement requirement concerns also STDIs. The rationale is that an ATCO licence holder shall not exercise the privileges of the licences unless he/she has a valid language proficiency endorsement and exercising the privilege of the STDI endorsement is seen as exercising the privileges of the licence.

Regulation 805/2011 requires one or more rating endorsements, including TCL and OCN, to be added to an ACS rating. However, Regulation 2015/340 does not appear to allow for both the TCL and OCN ratings to be added to an ACS rating at the same time.

EASA acknowledges that both TCL and OCN rating endorsements could be associated to the ACS rating at the same time. As this amendment will require a change to the IR, EASA will address it with its next Opinion to EC resulting from rulemaking activities on 'Maintaining of ATCO IR/AMC/GM'.

If an assessors is assessed medically unfit, is he/she is allowed to perform or conduct assessments?

EASA acknowledges that assessors are only required to possess a valid medical certificate, when they exercise the privileges of the assessor endorsement as described in ATCO.C.045(b)(3) and (4), i.e. performing assessments leading to the issue, revalidation and renewal of unit endorsements. He/she could still carry out assessments as in the cases specified in ATCO.C.045 (b)(1), (2) and (5), i.e. assessment related to initial training and to the issue of OJTI/STDI and assessor endorsements (provided that he/she has the required experience).

Furthermore, in reference to the introductory part of Appendix 1 to Annex II 'Format for licence - AIR TRAFFIC CONTROLLER LICENCE', paragraph (b) that states "The licence shall be accompanied by a valid medical certificate, except when only STDI privileges are exercised", EASA acknowledges that it needs to be aligned, which privileges require the existence of a valid medical certificate and it will be addressed with EASA next Opinion to EC resulting from rulemaking activities on 'Maintaining of ATCO IR/AMC/GM'.

What should be assessed and/or examined in relation to conversion training? When are the assessments/examinations to take place and who can conduct the assessments?

Trending

The conversion training courses shall include the determination of the examination and/or assessment methods. The examination and/or assessment should take place during the conversion training course or at least before the ATCOs exercise the privileges of their licences in the changed operational environment. Examinations and assessments should be conducted by appropriately qualified personnel having detailed knowledge of the training objectives and the subjects, topics and subtopics being examined or assessed.

Should an STDI endorsement be issued for an OJTI who is no longer competent? In such case, is there a possibility for a temporary issue of the STDI endorsement or can the OJTI endorsement be retained on the licence if it is anticipated that the OJTI would regain competency?

ATCO.C.010 states that the OJTI endorsement entitles the person to also exercise the privileges of an STDI endorsement (that is, to provide practical training on Synthetic Training Devices (STDs)). Thus, there is no need to introduce both endorsements simultaneously into the licence during the validity of the OJTI endorsement. Once the OJTI endorsement cannot be exercised, it can be exchanged into an STDI endorsement, for which the validity date shall correspond to the validity date of the original OJTI endorsement, until its next revalidation.

What should be assessed and/or examined in relation to refresher training? When are the assessments/examinations to take place and who can conduct the assessments?

ATCO.B.025(a)(5) and (7) require the air navigation service provider as part of the UCS to define processes for assessing competence, including assessment of the refresher training subjects according

to ATCO.D.080(b) and to define the processes to identify the topics, subtopics and training methods for continuation training (including refresher training).

ATCO.D.080(c) stipulates that when subjects of refresher training refresh the skills of ATCOs, performance objectives have to be established and included in the training syllabus.

In this context, GM1 ATCO.D.080 further clarifies that 'refresher training subjects may include rarely used procedures and practices, such as seasonally dependent procedures, trends and observations from occurrence reports and results from normal operation surveys'. Consequently, the use of STD or other simulated environments in this case would allow for the assessment of these procedures and practices, at any time and with the desired effect.

In accordance with AMC1 ATCO.B.025(a)(5);(6), subjects taught during refresher training, such as standard practices and procedures, abnormal and emergency situations and human factors, should be assessed on STD or in other simulated environments and/or examined. This is because it might not be possible to observe the skills related to all refresher training subjects (e.g. those related to seasonally dependent procedures) during the regular assessment.

Assessments are required on subjects that are of practical nature, while other subjects should be examined. When defining the need for assessment and/or examination, attention should be paid on the training objectives (what is the required performance/taxonomy level) and the processes and method for assessment/examination.

It is left to the Training Organisation, in coordination with the Air Navigation Service Provider, to decide and to arrange for the assessment of refresher training subjects in the context of the 'regular' assessment purposed for the revalidation of the unit endorsement. In this case, a clear link between the refresher training subjects and the performance objectives of the assessment needs to be established.

If the assessment of refresher training subjects is taking place during the assessment leading to the revalidation of the unit endorsement, the person conducting the assessment shall be a holder of an assessor endorsement. Should the assessment take place during the refresher training course, the assessments should be conducted by appropriately qualified personnel having detailed knowledge of the training objectives and the subjects, topics and subtopics being examined or assessed. It could be either assessors or e.g. human factors specialists.

In case that the Training Organisation certified for refresher training does not hold a certificate for ATC provision, the processes for assessment and examination should be addressed in the specific agreement concluded between the Training Organisation and the an ANSP.

How should the pages and the information in Item XIIa 'Rating and endorsements with expiry date' be arranged within the ATCO licence format?

Item XIIa 'Ratings and endorsements with expiry dates' could be arranged in two ways:

- either by 1 table in landscape orientation – using 2 pages of 1/8 A4 (e.g. Pages 5 and 6); or
- by 2 tables in portrait orientation – each of them rotated with the respective heading (e.g. Pages 5 and 6).

How should ratings and rating endorsements be linked together in the proposed licence format?

There are two rating endorsements (Terminal Control (TCL) and Oceanic Control (OCN)) that can be attached either to the Approach Control Surveillance (APS) or the Area Control Surveillance (ACS) rating. The licence template establishes in point IX a place for ratings and another one for rating endorsements, with no link between these two. The question is how to differentiate between the two: to which rating (APS or ACS) corresponds each one of those rating endorsements (TCL or OCN)? Is it necessary at all to make the distinction?

The 'pairing' of the current rating(s) and rating endorsement(s) is visible in point XIIa, which lists the ratings and rating endorsements according to the unit endorsements. Apart from that, there is no need to distinguish further.

ATCOs who already hold a licence with an on-the-job training instructor (OJTI) endorsement according to Regulation (EU) No 805/2011, could they have their licence replaced to include the synthetic training device instructor (STDI) endorsement, with the same expiry dates?

ATCO.C.010 states that the OJTI endorsement entitles the person to also exercise the privileges of an STDI endorsement (that is, to provide practical training on Synthetic Training Devices (STDs)). Thus, there is no need to introduce both endorsements simultaneously into the same licence, until the OJTI is valid. Once the OJTI endorsement cannot be exercised anymore, it can be exchanged into an STDI endorsement whose validity date shall correspond to the validity date of the original OJTI endorsement, until its next revalidation.

Is the same 'practical instructional techniques course' valid for obtaining/revalidating the OJTI/STDI licence endorsements?

The competences to be gained at the end of the practical instructional techniques course for the OJTI or STDI endorsement are the same (see AMC2 ATCO.D.090(a)(1)), but there may be differences in the assessment (see AMC1 ATCO.D.090(a)(3)) and there may also be natural differences between the courses themselves based on the applicants they are addressing.

How to deal with practical instructors employed at an initial training centre who no longer hold a medical certificate?

If the practical instructor was holding an OJTI endorsement, it can be exchanged for an STDI endorsement. If the practical instructor was holding an STDI endorsement though, there is no need for exchange.

How to issue a licence with STDI privileges for applicants not holding a licence and associated ratings issued in accordance with Regulation (EU) No 805/2011?

If the ratings are issued in accordance with Directive 2006/23/EC, they are 'grandfathered'. Thus, a licence with an STDI endorsement could be issued to applicants who fulfil the provisions of ATCO.C.035. In order to exercise the privileges of the STDI endorsement, the holder has to demonstrate compliance with ATCO.C.030(b) including demonstrated knowledge of current operational practices.

If the ratings are issued earlier than the Directive, the competent authority would need to assess the equivalence between the old (ICAO?) ratings and the current ones. In the case where the applicant has not held a licence (because there were no licences in the Member State in question), the applicant would need to provide evidence for the working experience in the ATC domain in question and related training records to the competent authority, which would need to evaluate whether the applicant fulfils the requirements of ATCO.C.035.

Is there a requirement for an ATCO who holds an ACS rating to also hold an ACP rating?

No, there is no such explicit requirement in the Regulation. This depends on the service provided. If Air Traffic Control (ATC) is only provided with the use of surveillance equipment, there is no need for the ATCO to also hold the procedural rating, e.g. for applying vertical separation in emergency situations, this should be part of the ACS training. If the contingency plans also include procedures for service continuity by means of providing (limited) procedural ATC, a procedural rating should be required. It also needs to be taken into account what applies for the maintenance and revalidation of the unit endorsement.

It was explained at the ATCO Regulation Workshop in March 2015 that in the event of surveillance failure which results in having to switch to a procedural environment, once the failure is contained and the environment made safe, the provision of any further service would require an Approach Control Procedural (APP) or an Area Control Procedural (ACP) rating. What about if the unit or sector, operated in a rigid environment of 1 departure every 10 minutes, is to be handed over to a surveillance unit/sector and with no other traffic involved, would this be considered a requirement for the procedural rating?

As a rule of thumb, the provision of procedural ATC requires a procedural rating. It should be evaluated on a case-by-case basis, e.g. whether procedural separation/clearances/procedures would be used.

The removal of the age limit from an ATCO licence is a difference against the ICAO Standards And Recommended Practices (SARPs). Are Member States required to file a difference to ICAO or has EASA already notified ICAO on behalf of Member States?

Filing of differences falls within the competence of the Member States, since EASA (or the EU) is not an ICAO member. EASA, however, prepares the Compliance Checklist for ICAO Annex 1 in relation to Regulation (EU) 2015/340, which will be communicated to the Member States via the network of the European National Continuous Monitoring Coordinators.

Initial Training Centre Assessors will be granted 'grandfather rights', according to Regulation (EU) 2015/340, with regard to the assessor endorsement. Shall this assessor privilege be endorsed on their licence?

Trending

Such privileges are not automatically 'grandfathered'. It is up to the evaluation of the Member State how to convert the privileges of personnel acting as examiners or assessors for initial training (according to Regulation (EU) No 805/2011) into an assessor endorsement (according to Regulation (EU) 2015/340). Based on that evaluation, Member States may establish conversion requirements for this personnel in order to be issued with an assessor endorsement. The conversion shall be performed in accordance with the opt-out derogations.

Appendix 1 of Annex 2 is quite prescriptive as regards the content of the licence. It indicates that each page of the licence shall be one-eighth A4 (first quality paper). Do we need to identify all the pages with numbers and do they all belong to the same piece of paper? For the optional item V (holder's address), should we decide not to ask for it, can we delete line V from the licence?

The licence should ideally be one piece of paper of six pages (including the list of abbreviations). In this case, there is no need to identify the pages with numbers as the identification is done by the numbers of the columns (items). If the licence is printed on separate pages, the licence number and the date of issue, as well as page numbers, should be printed on each page. Item V (holder's address) can be left empty, or it can be omitted from the licence, while still maintaining the layout of page 2.

Is it acceptable to have a licence with electronic elements, with the possibility for the ATCO to get the data via the Internet or by connecting the licence to a computer? Is a credit card format acceptable? If yes, can we have on the recto of the card the elements of page one, an on the verso the items of page 2? Is it compulsory to have all the permanent items displayed on the plastic card? Are there any EASA requirements for the font type and size, as well as the size of the card? For the signature of the holder, is it acceptable to use the signature on the application form and duplicate it on the licence (credit card format)?

The licence format, as set out in Regulation (EU) 2015/340, is developed in line with the specifications for personnel licences as required by ICAO Annex 1, and its purpose is to facilitate the recognition of licences at EU level. The means used to display the required information is left to the competent

authorities. It should be either first quality paper and/or other suitable material, including plastic cards, which prevent or readily show any alterations or erasures. Any entries to or deletions from the form should be clearly authorised by the competent authority. The size of each page shall be one-eighth A4. There are no EASA requirements for the font type and size. Both the permanent and variable items shall be displayed on or as part of the licence. Only the variable items may appear on a separate or detachable part of the main form. The signature of the holder (as 'permanent' item) should appear on the 'main part' of the licence.

What does 'national licence endorsement' mean in GM1 ATCO.AR.D.001(c)?

Following Standardisation feedback, the Guidance Material in question has been introduced with the aim of allowing competent authorities to enter any additional licensing information deemed necessary, such as national licence endorsements and/or Radio-Telephony (R/T) licences. National licence endorsements may be issued for various reasons. They may convey additional information, according to national needs, but they are not subject to recognition at EU level. Such national licence endorsements may not limit or extend the privileges granted by the licence itself. It is important to note that they are not to be mistaken with national rating endorsements, which cannot be maintained according to Regulation (EU) 2015/340.

In case we have specimen of the new licences before issuing them, would EASA be in the position to verify whether they comply with the new requirements?

EASA would naturally advise competent authorities via various forms and fora on the implementation of the new requirements. However, the advance verification of licences not yet issued would not be in line with the shared competences in this domain and wouldn't be compatible with the Agency's task to conduct the standardisation inspections neither.

What are the assessor prerequisites for assessing applicant OJTIs and applicant assessors?

In order to assess for the purpose of the practical instructional techniques course for OJTIs/STDI, the person shall hold an assessor endorsement and shall have 3 years' OJTI/STDI experience. This means that only persons who have held at least an ATCO licence can perform such assessments. Currency is not a requirement. This is to ensure that the person in question is capable of maintaining safety during the assessment and capable of fully assessing the skills that are needed for the future OJTI in relation to maintaining safety. The human factor expert in the example may be the most appropriate person to deliver the course, but is not trained for assessing their applicants in the operational context and to verify the safety element to be possessed by the future OJTI.

ATCO.A.010 'Exchange of licence' — Is this procedure valid also for the medical certificate?

No, there is no need to exchange the medical certificate. Medical certificates issued by any certified aero-medical examiner (AME)/ aero-medical centre (AeMC) are mutually recognised. Please, refer to GM1 ATCO.A.010 'Recognition of licences and certificates'.

ATCO.AR.D.001(a)(2) ...authorisation for assessors... — Does this mean that the competent authority shall specifically approve the assessors who will renew and revalidate unit endorsements?

It is up to the competent authority to decide whether they want to delegate this task to (certain) assessors. If they do, a procedure has to be established and the assessors have to be specifically authorised for the task.

Radio-telephony — I cannot find any provisions in Regulation (EU) 2015/340 requiring ATCOs to hold a radio-telephony certificate in order to be able to provide Air Traffic Services (ATS). There is also nothing on this in the licence form.

Trending

There are no requirements in Regulation (EU) 2015/340 for a radio-telephony licence. These requirements stem from the International Telecommunication Union (ITU) and are dealt with at national level. However, in accordance with GM1 ATCO.AR.D.001(c), there is the possibility for the competent authority to include the radio-telephony licence in point XIII of the licence format, if they so wish.

It is still unclear whether training for a rating endorsement is initial training or unit training. Is it up to the competent authority to decide? If training for a rating endorsement is considered to be initial training, does the ATS unit providing the training need to be certified for initial training?

Training for rating endorsements can be both initial training and unit training (see ATCO.D.005(a)(1) and (2)). It is up to the training organisation to define the training and include it either in the initial training plan or as part of a unit endorsement course, both of which have to be approved by the competent authority. If the training for a rating endorsement is provided by an ATS unit as part of a unit endorsement course, the ATS unit (Air Navigation Service Provider (ANSP)) has to be certified in order to provide training relevant to the rating endorsement in question. The type of training and the rating endorsement, for which the training is provided, shall be indicated to the competent authority when applying for the training organisation certificate (see ATCO.OR.B.001(c)(5)) and shall also be marked on the training organisation's certificate according to the template provided in Appendix 2 of Annex II.

ATCO.D.015(f) 'Initial training plan' - What does this paragraph mean?

As the provision ATCO.D.010(b), referenced in ATCO.D.015(f), explicitly refers to 'training for an additional rating', the initial training plan shall include the description of a process to permit an applicant who has successfully completed initial training (therefore holding a student ATCO licence or an ATCO licence) to join an initial training course only for the rating training course therein, to achieve one or more additional ratings. This provision is relevant in particular in the case of integrated initial training courses, which are established in accordance with ATCO.D.020(a) and (b).

Is it possible for ANSPs to provide training (e.g. transitional, pre-OJT, OJT, and continuation training) when having 'training' marked on its ANSP certificate without being certified as an ATCO training organisation?

With the new ATCO Regulation (EU) 2015/340 and the introduction of the ATCO TO certificate template, the possibility according to Article 27(3) of Regulation (EU) No 805/2011 stating that 'The certificate may be issued for each type of training or in combination with other air navigation services, whereby the type of training and the type of air navigation service shall be certified as a package of services' is not anymore valid.

Furthermore, it is important to note that according to Article 8(2) of Regulation (EU) 2015/340 the certificates for air traffic controller training organisations shall be replaced with certificates complying with the format laid down in Appendix 2 of Annex II to said Regulation, and for the new applicants according to ATCO.AR.E.001(b), if the applicant training organisation fulfils the applicable requirements, the competent authority shall issue a certificate using the format established in Appendix 2 of Annex II.

When a total number of minimum hours to exercising the privileges of unit endorsement is established e.g. 150 in accordance with ATCO.B.025(a)(3), would it be sufficient for an OJTI to exercise his/hers privilege for 75 hours and the remaining 75 as OJTI?

Yes, it would be acceptable. The intent of the rule is to ensure that the OJTIs exercise the privileges of the licence 'on their own' and do not maintain the privileges just by instructing.

How would it be possible to obtain information about Alternative Means of Compliance (AltMoCs) to the requirements of Regulation 2015/340 used by other Member States?

States are obliged to inform EASA only if they adopt AltMoCs, those will then be treated according to the procedure set out in the rule.

To support Member States in the uniform application of the provision in question, EASA has created a webpage on its website to include [information on AMC and AltMoCs](#), including a form to be used to notify the Agency.

Said website clearly disclaimed that EASA maintains this list of AltMoCs notified to it by the competent authorities of the Member States ('CAs') for purely information purposes, at the request of the CAs. The content may be subject to changes at any time without prior notice. This material is amongst others not professional advice, or any form of assessment, judgement or acceptance by EASA.