



# FOCA AltMoC

Alternative Means of Compliance

## Helicopter Recurrent Training and Checking

This document is an 'Alternative Means of Compliance' issued by FOCA



Scope	Recurrent training and checking on more than one type or variant
Applies to	Helicopter Operators
Valid from	18 April 2018
Purpose	Compulsory

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Prepared by	N. Mordasini, SBHE
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This document is an  
**Alternative Means of Compliance (AltMoC) issued by FOCA**

according to

Regulation (EU) No 1178/2011 (Air Crew), ARA.GEN.120, or  
Regulation (EU) No 965/2012 (Air Operations), ARO.GEN.120

## Preliminary Information

### What is an AltMoC issued by FOCA?

The EASA homepage on the internet states (as of end 2016):

‘Since AMCs are non-binding, regulated persons may choose alternative means to comply with the rule. In this case, however, they lose the presumption of compliance provided by the EASA AMC, and need to demonstrate to competent authorities that they do comply with the law.

The implementing rules for Aircrew licensing, Air Operations, Aerodromes and Air Traffic Controller licensing describe the process to be used by regulated persons and competent authorities when they intend to use an AltMoC to comply with the rules.

Implementing Rules establish that the implementation of AltMoC by organisations is subject to prior approval by the competent authority and indicate what needs to be done in order to obtain the approval.

Implementing Rules also establish the obligations of competent authorities when giving the prior approval to an organisation and when they adopt themselves an AltMoC that can be used by the regulated organisations under their oversight.

One of the obligations stipulated in the Implementing Rules is to notify EASA of such AltMoCs. Competent authorities are requested to use the EASA prepared AltMoC Notification Form for notifying AltMoCs proposed by organisations or used by themselves.

For more information from EASA on AMC and AltMoC, please consult the [FAQ](#).’

To these statements FOCA would like to add the following additional information:

- AltMoCs may not only be issued as alternative to an already existing AMC. FOCA may as well publish AltMoCs that cover issues where no AMC is available. Therefore, the term *alternative* may be slightly misleading in some cases.
- AltMoCs may be seen as an administrative ordinance in traditional Swiss legal doctrine. However, conditions, issuing power and legal effects are pure products of Union legislation. Legal practitioners, attorneys and courts in Switzerland, therefore, should not attempt to categorise AltMoCs under traditional national principles of administrative law. They should always bear in mind that AltMoC are genuine legal instruments of the EU aviation safety regulation.

### What are the effects of an AltMoC issued by FOCA?

AltMoCs issued by FOCA have basically the same legal status and effect as AMCs. Except that the author of AltMoCs is not EASA but FOCA. AltMoCs are not evaluated by EASA in advance but are only reviewed during regular standardisation. Therefore, once released by FOCA, AltMoCs become immediately applicable to all parties under Swiss jurisdiction. In other words, they immediately may be used as an alternative to existing AMCs or they must be used if no such AMC is available. In either case they provide presumption of conformity with the essential requirements and the implementing rules.

However, AltMoCs do not have cross-border effect: an operator under foreign jurisdiction has no legal claim to his competent authority to allow use of an AltMoC issued by FOCA. And FOCA will not automatically accept in its jurisdiction the use of an AltMoC issued by foreign competent authorities.

Different matters are AltMoCs developed and requested by an ATO, operator or regulated person and which are not issued but only approved by FOCA. These have effect for the applicant only. Third parties must submit a complete application for their own including full proof that their AltMoC fulfils the legal requirements.

AltMoC may motivate EASA to initialise own rule making aiming an additional IR or additional AMC. The start of such rule making procedure does *senso stricto* not have any effect on the AltMoC until the time where a revised IR or a new AMC legally replaces the AltMoC. However, such rule making activities might increase the likelihood that competent authorities accept the underlying foreign AltMoC.

## Log of Revision (LoR)

Date	Issue	Revision	Highlight of Revision
05.04.2018	1	0	First Issue

## List of Effective Chapters

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## List of Abbreviations

LoA ISS 1 / REV 0 / 05.04.2018

The following abbreviations are within this AltMoC:

<b>Abbreviation</b>	<b>Definition</b>
AltMoC	Alternative Means of Compliance
AMC	Acceptable Means of Compliance
CAT	Commercial Air Transport
EASA	European Aviation Safety Agency
FCL	Flight Crew Licensing
FOCA	Federal Office of Civil Aviation
GM	Guidance Material
LC	Line Check
LFUS	Line Flying Under Supervision
LPC	Licence Proficiency Check
ME	Multi Engine
ODR	Operator Differences Requirements
OSD	Operational Suitability Data
OPC	Operator Proficiency Check
SE	Single Engine

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## 0 Introduction

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This AltMoC intends to provide a concept for grouping different single-engine helicopters (types and variants) in order to reduce the amount of checks and to extend the recurrent training cycle for flight crew members operating more than one single-engine helicopter in commercial air transport (CAT).

### 0.1 Legal References

Ch. 0.1 ISS 1 / REV 0 / 05.04.2018

Reference	Issue	Subject
Basic Regulation (EC) No 216/2008	20.02.2008	Common rules in the field of civil aviation and establishing a European Aviation Safety Agency
Commission Regulation (EU) No 965/2012	05.10.2012	Laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council
Commission Regulation (EU) No 1178/2011	03.11.2011	Laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council
Commission Regulation (EU) No 748/2012	03.08.2012	Laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations

### 0.2 Purpose of this AltMoC

Ch. 0.2 ISS 1 / REV 0 / 05.04.2018

Some operators conduct operations with different types and/or variants of helicopters. Therefore the flight crew need to perform multiple checks and trainings on these helicopters in order to establish compliance with the licence and operational requirements.

According to ORO.FC.230, for the purpose of the operator proficiency check (OPC), the relevant helicopter types may be grouped. FCL.740.H allows, under certain conditions, the revalidation of all the relevant type ratings by completing the proficiency check in only 1 of the relevant types held.

Beside the provision of a grouping concept for helicopters (types and/or variants), the AltMoC intends to clarify the conditions for checks and trainings according to the concept.

### 0.3 Scope

Ch. 0.3 ISS 1 / REV 0 / 05.04.2018

- Grouping of single-engine helicopters (types and variants) for operational checking and training purposes
- Combination of operator's training and checking (OPC, LC) and the LPC
- Extension of the annual recurrent flight training cycle for a third helicopter type



## 0.4 Terms and Conditions

Ch. 0.4 ISS 1 / REV 0 / 05.04.2018

When used throughout the AltMoC the following terms shall have the meaning as defined below:

Term	Meaning	Reference
<i>shall, must, will</i>	These terms express an obligation, a positive command.	EC English Style Guide: Ch. 7.19
<i>may</i>	This term expresses a positive permission.	EC English Style Guide: Ch. 7.21
<i>shall not, will not</i>	These terms express an obligation, a negative command.	EC English Style Guide: Ch. 7.20
<i>may not, must not</i>	These terms express a prohibition.	EC English Style Guide: Ch. 7.20
<i>need not</i>	This term expresses a negative permission.	EC English Style Guide: Ch. 7.22
<i>should</i>	This term expresses an obligation when an acceptable means of compliance is to be applied.	EASA Acceptable Means of Compliance publications FOCA policies and requirements
<i>could</i>	This term expresses a possibility.	<a href="http://oxforddictionaries.com/definition/english/could">http://oxforddictionaries.com/definition/english/could</a>
<i>ideally</i>	This term expresses a best possible means of compliance and/or best experienced industry practice.	FOCA recommendation

**Note:** To highlight information or an editorial note a specific note box is used.

- The use of the male gender should be understood to include male and female persons.

## 0.5 Definitions

Ch. 0.5 ISS 1 / REV 0 / 05.04.2018

**‘Alternative Means of Compliance’** means those means that propose an alternative to an existing acceptable means of compliance or those that propose new means to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules for which no associated AMC have been adopted by the Agency

**‘Proficiency check’** means the demonstration of skill to revalidate or renew ratings, and including such oral examination as may be required.

**‘Revalidation’** (of, e.g. a rating or certificate) means the administrative action taken within the period of validity of a rating or certificate which allows the holder to continue to exercise the privileges of a rating or certificate for a further specified period consequent upon the fulfilment of specified requirements.

**‘Type of aircraft’** means a categorisation of aircraft requiring a type rating as determined in the operational suitability data established in accordance with Part-21, and which include all aircraft of the same basic design including all modifications thereto except those which result in a change in handling or flight characteristics.

# 1 Implementing Rules

Ch. 1 ISS 1 / REV 0 / 05.04.2018

## ORO.FC.230 Recurrent training and checking

- (a) Each flight crew member shall complete recurrent training and checking relevant to the type or variant of aircraft on which they operate.
- (b) Operator proficiency check
- (1) Each flight crew member shall complete operator proficiency checks as part of the normal crew complement to demonstrate competence in carrying out normal, abnormal and emergency procedures.
- ...
- (c) Line check
- (1) Each flight crew member shall complete a line check on the aircraft to demonstrate competence in carrying out normal line operations described in the operations manual. The validity period of the line check shall be 12 calendar months.

## ORO.FC.240 Operation on more than one type or variant

- (a) The procedures or operational restrictions for operation on more than one type or variant established in the operations manual and approved by the competent authority shall cover:
- ...

### Existing Acceptable Means of Compliance – OPS:

- AMC1 to ORO.FC.230 and AMC1 to ORO.FC.240.

## FCL.740.H Revalidation of type ratings – helicopters

- (a) For revalidation of type ratings for helicopters, the applicant shall:
- (1) pass a proficiency check in accordance with Appendix 9 to this Part in the relevant type of helicopter or an FSTD representing that type within the 3 months immediately preceding the expiry date of the rating; and
- (2) complete at least 2 hours as a pilot of the relevant helicopter type within the validity period of the rating. The duration of the proficiency check may be counted towards the 2 hours.
- (3) When applicants hold more than 1 type rating for single-engine piston helicopters, they may achieve revalidation of all the relevant type ratings by completing the proficiency check in only 1 of the relevant types held, provided that they have completed at least 2 hours of flight time as PIC on the other types during the validity period.

The proficiency check shall be performed each time on a different type.

(4) When applicants hold more than 1 type rating for single-engine turbine helicopters with a maximum certificated take-off mass up to 3 175 kg, they may achieve revalidation of all the relevant type ratings by completing the proficiency check in only 1 of the relevant types held, provided that they have completed:

- (i) 300 hours as PIC on helicopters;
- (ii) 15 hours on each of the types held; and
- (iii) at least 2 hours of PIC flight time on each of the other types during the validity period.

The proficiency check shall be performed each time on a different type.

(5) A pilot who successfully completes a skill test for the issue of an additional type rating shall achieve revalidation for the relevant type ratings in the common groups, in accordance with (3) and (4).

- (6) The revalidation of an IR(H), if held, may be combined with a proficiency check for a type rating.
- (b) An applicant who fails to achieve a pass in all sections of a proficiency check before the expiry date of a type rating shall not exercise the privileges of that rating until a pass in the proficiency check has been achieved. In the case of (a)(3) and (4), the applicant shall not exercise his/her privileges in any of the types.

**Existing Acceptable Means of Compliance – FCL:**

- AMC1 FCL.740.H(a)(3) Revalidation of type ratings — helicopters

## 2 Cross-Crediting of Checks and Trainings

Ch. 2 ISS 1 / REV 0 / 05.04.2018

### 2.1 Recurrent Training and Checking when Operating more than one Single-Engine Helicopter

Ch. 2.1 ISS 1 / REV 0 / 05.04.2018

#### Grouping

According to ORO.FC.230 (b) (4) and for the purpose of this AltMoC, single engined turbine helicopters (or single engined piston helicopters) with a MTOM up to 3175 kgs may be, due to the similar characteristics, considered as part of the same single-engine turbine group (or the same single engine piston group). Operators may use the grouping for their flight crew members, provided they meet the requirements of FCL.740.H (a) (3) or/and (a) (4).

#### Variants

When credits defined for training and checking requirements in data established in accordance with Regulation (EU) No 748/2012, the flight crew member may complete his training, OPC and the LC in only one of the variants held if said variants fall under a single licence endorsement and the operations of the relevant variants are sufficiently similar\*. Differences between variants according to OSD (or an ODR table, if no OSD is available) should be addressed, on a yearly basis during the recurrent training, through a briefing or training, as appropriate.

#### Types

Furthermore, when the cross-crediting of checks on various types are allowed for type rating revalidation purposes according to paragraph FCL.740.H of regulation (EU) Nr. 1178/2011 and the operations of the relevant types are sufficiently similar\*, the same type related crediting is possible for the OPC and the LC required in ORO.FC.230, in which case all applicable conditions of FCL.740.H should be met.

The OPC should be performed each time on the type least recently used for the checks. The relevant single-engine helicopter types that may be grouped for the purpose of the OPC should be contained in the operations manual.

When three different helicopters types are operated, the recurrent flight training on the third type may be extended to 18 months, provided that

- the different types are part of the same group of helicopters and
- the recurrent flight training covers all major system failures.

\* sufficiently similar in terms of

- 1) use of aerodromes or operating sites;
- 2) normal procedures, including take-off and landing procedures;
- 3) use of automation.

### 2.2 Line Check on a Specially Arranged Representative Flight

Ch. 2.2 ISS 1 / REV 0 / 05.04.2018

The line check should be completed on a commercial flight, where the person conducting the line check occupies an observer's seat. To be able to perform the LC on a specially arranged representative flight, the operator shall have an appropriate AltMoC according to ORO.GEN.120.

### 2.3 Combination of Training and Checking

Ch. 2.3 ISS 1 / REV 0 / 05.04.2018

According to AMC1 ORO.FC.230 the aircraft / FSTD training may be combined with the operator proficiency check. Furthermore the OPC may be combined with the LPC. It should be noted that the flight training shall be prior or adjacent to, but not simultaneous, with the check(s). The flight shall be interrupted by a landing to allow a clear disjunction between the different objectives.

### 3 Cross-Crediting of Operational Checks and Trainings – Examples

Ch. 3 ISS 1 / REV 0 / 05.04.2018

#### 3.1 Variants

Ch. 3.1 ISS 1 / REV 0 / 05.04.2018

A pilot operating three different variants of the AS350 / EC130 helicopter type should perform the operational checks (OPC, LC) and the recurrent flight trainings as follows:

Month/Year	OPC	Line Check	Flight Training	Performed in (variant)	License Endorsement
January 2018	X	X	X*	AS 350 B3	AS350 / EC130
June 2018	X		*	AS 350 B2	AS350 / EC130
January 2019	X	X	X*	EC 130 T2	AS350 / EC130
June 2019	X		*	AS 350 B3	AS350 / EC130
January 2020	X	X	X*	AS 350 B2	AS350 / EC130

\*Differences between variants according to OSD should be addressed, on a yearly basis during the recurrent training, through a briefing or training, as appropriate.

#### 3.2 Types

Ch. 3.2 ISS 1 / REV 0 / 05.04.2018

A pilot operating three different helicopter types should perform the operational checks (OPC, LC) and the recurrent flight trainings as follows:

Month/Year	OPC	Line Check	Flight Training	Performed in (type)	License Endorsement
January 2018	X	X	X*	AS 350 B3	AS350 / EC130
June 2018	X		X*	R66	R66
January 2019	X	X	X*	Agusta Bell 206 B	Bell 206
June 2019	X		X*	AS 350 B3	AS350 / EC130
January 2020	X	X	X*	R66	R66

\*Training of all major system failures.