

Alternative Means of Compliance



Type Renewal for Flight Test Rated Pilots AltMoC No. IT-LIC-2018-002

Regulatory reference:	
Regulation (EU) 1178/2011, Annex I	
Rule paragraph(s)	FCL.740 AMC1 FCL.740(b)

List of Effective Pages:		
Page number	Revision number	Revision date
1	Rev.0	14 th december 2018

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1	<i>Full text of the AltMoC</i>
<p>Renewal of Class and Type Ratings: Refresher Training at an ATO or DTO, or with an instructor</p> <p>A new subparagraph (d) is added to the current AMC1 FCL.740(b)</p> <p>(d) If the applicant for a renewal holds a flight test rating issued in accordance with FCL.820 and were involved during the period of validity of the relevant type or class rating in the development, certification or production flight tests, and have completed 10 hours of flight time as PIC on test flights, can have the relevant type or class rating renewed without further training, checking, or assessment by an ATO or DTO.</p>	

2	<i>Full description of the AltMoC, which includes reasoning of the AltMoC</i>
<p>The procedure for the issue of a type or class rating as expressed in the FCL.725(e) clearly suggests that an holder of a flight test rating issued in accordance with FCL.820 has acquired adequate competencies to properly and safely operate any type or class rating provided he/she has completed a certain amount activity in development, certification or production flight tests for that aircraft type. The same holder of a flight test rating, if continues to be involved in development, certification or production flight tests, should be able then to renew his/her type rating without additional training. This seems to be the case of holders of flight test rating who are regularly employed by aircraft manufacturer (some holding more than one type rating at the same time), which in this case would benefit from such provision. In addition the AltMoC has added to the provision of renewing the type rating also that for the renewal of a class rating.</p>	

3	<i>Assessment demonstrating that the IR(s) are met</i>
<p>This AltMoC meets the IR both in terms of compliance with the amount of flight testing activity required and the level safety assured.</p> <p>The flight test rated pilot holder of the type or class rating is required to fulfill at least what is required in the FCL.725(e) which entitled the pilot for the issuance of a new type rating to begin with. The renewal of a type rating is of a lower risk level compared to the issuance of a new type rating, and using the same requirements of the former, the safety level is at least equivalent. Also, including the renewal of the class rating does not add any significant risk, and covers what it may have been an overlook of the regulation(s)</p>	



4	<i>Procedures for the use of the AltMoC</i>
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	AltMoC Procedures for the Applicant
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	<p>In the event of an holder of a flight test rating being involved in development , certification or production flight test for an aircraft type or class choosing to renew of his/her type ratings by using this AltMoC shall bring a report signed by a responsible person of the manufacturer or the MRO of the required activity to a (DA) ENAC airport office and have the type or class renewal endorsed on his/her licence.</p>
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