

Alternative Means of Compliance



ORO.FC.105(b)(2);(c) Designation as pilot-in-command/commander

AltMoC No. IT-OPS-2023-002

This document is an Alternative Means of Compliance (AltMoC) issued by ENAC in accordance with Reg. (EU) 965/2012, para. ARO.GEN.120(e).

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Regulation (EU) 965/2012, Annex IV	
Rule paragraph(s)	ORO.FC.105(b)(2);(c)

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1	Rev. 0	July 19 st , 2023
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3	Rev. 0	July 19 st , 2023

Ente Nazionale per l'Aviazione Civile (ENAC) contacts for this AltMoC	
ENAC Department	Direzione Navigabilità e Operazioni (ONO)
Contact details (email)	operazioni.volo@enac.gov.it protocollo@pec.enac.gov.it

1 **Full description of the AltMoC, which includes reasoning of the AltMoC**

ENAC, given the powers and obligations from Italian law, has issued specific prescriptions for the use of Italian aerodromes with specific orographic, meteorological and operational peculiarities or with flight procedures non in accordance with ICAO standards.

These prescriptions could concern additional flight crew experience or qualification requirements including instruction in an FSTD or visiting the aerodrome.

EASA has acknowledged this practice, common to the competent authorities of other UE/ICAO member states, and with the ED Decision 2022/014/R, revising the AMC1 ORO.FC.105(b)(2);(c) "*Designation as pilot-in-command/commander*" in order to take into account these cases.

AMC1 ORO.FC.105(b)(2);(c) defines as category C an aerodrome:

(A) that requires additional considerations to those of a category B aerodrome;

or

(B) for which flight crew experience or qualification requirements stipulated by the competent authority responsible for the aerodrome include instruction in an FSTD or visiting the aerodrome.

In some Italian aerodromes the above mentioned peculiarities and the subsequent ENAC prescriptions are specific for only individual runways and not for the whole aerodrome. In these cases a conflict between ENAC and EASA category "C" familiarisation training requirements could arise in relation to of visiting the aerodrome as an observer and/or undertaking instruction in a suitable FSTD. Indeed, due to meteorological and/or traffic issues or any other reasons, the visit at the aerodrome could not be performed by the operator on the runway that presents specific peculiarities and safety issues, but on a different one, less demanding, nullifying the training effort. Moreover if an operator wanted to plan operations in those aerodromes using only that specific runway that does not present safety peculiarities, it should be unreasonably obliged to perform additional flight training that is only necessary on other runway. This situation could be more critical when instruction in FSTD is not possible for unavailability of certified visual scenario of the aerodrome.

Taking in account what mentioned above, this AltMoc is issued in order to allow ENAC, as Italian Civil Aviation Authority, to stipulate in the Italian AIP, when necessary, different flight crew experience or aerodrome qualification requirements for individual runway of the same aerodrome, taking into account specific and objective different peculiarities of those runways. As a

consequence, Italian operators are allowed to categorise those aerodrome by individual runways, depending on what stipulated by ENAC .

2 **Assessment demonstrating that the IR(s) are met**

Following consultation held among ENAC specialists, this measure is deemed to imply a condition of negligible safety risk and is considered to improve the intent of the relevant AMC, ensuring that the pilot in command/commander is adequately trained in flight or in a suitable FSTD on the specific runways that presents specific peculiarities and for which the Competent Authority responsible for the aerodrome requires additional considerations to those of a category B aerodrome.

On the other hand for aerodromes where no additional crew experience or qualification requirements have been stipulated by ENAC, there is no change in respect to AMC1 ORO.FC.105(b)(2);(c).

3 **Regulatory wording of the used AltMoC**

AltMoC1 ORO.FC.105(b)(2);(c) Designation as pilot-in-command/commander

GENERAL

(No changes)....

ROUTE, AREA AND AERODROME KNOWLEDGE FOR COMMERCIAL OPERATIONS

The experience of the route or area to be flown and of the aerodrome facilities and procedures to be used should include the following:

(a) Area and route knowledge

(No changes)....

(b) Aerodrome knowledge

*(1) Aerodrome **or, where applicable, runway** familiarisation training should include knowledge of obstructions, physical layout, lighting, approach aids and arrival, departure, holding and*

instrument approach procedures, applicable operating minima and ground movement considerations.

*(2) The operations manual should describe the method of categorisation of aerodromes **or, where applicable, of runway**, and, in the case of CAT operations, provide a list of those aerodromes/**runways** categorised as B or C.*

*(3) **Different categorisation of individual runways of the same aerodrome is applicable only where the competent authority responsible for an aerodrome has stipulated and published in AIP specific and different flight crew experience or qualification requirements, including instruction in an FSTD or visiting the aerodrome, for specific runways only and not for the whole aerodrome.***

*(4) All aerodromes **or, where applicable, all runways of the aerodromes** to which an operator operates should be categorised in one of these three categories:*

*(i) category A — an aerodrome **or, where applicable, a runway** that meets all the following conditions:*

(A) a straight-in 3D instrument approach procedure with a glide path angle of not more than 3.5 degrees to each runway expected to be used for landing;

(B) at least one runway with no performance-limited procedure for take-off and/or landing, such as no requirement to follow a contingency procedure for obstacle clearance in the event of an engine failure on take-off from any runway expected to be used for departure; and

(C) night operations capability.

*(ii) category B — an aerodrome **or, where applicable, a runway** that does not meet the category A conditions or which requires extra considerations due to:*

(A) non-standard approach aids and/or approach patterns, such as restrictions on the availability of straight-in instrument approach procedures;

(B) unusual local weather conditions, such as environmental features that can give rise to turbulence, windshear or unusual wind conditions;

(C) unusual characteristics or performance limitations, such as unusual runway characteristics in length, width, slope, markings or lighting that present an atypical visual perspective on approach;

(D) any other relevant considerations, including obstructions, physical layout, lighting, etc., such as restrictions on circling in certain sectors due to obstacles in the circling area;

(E) training or flight crew experience requirements stipulated by the competent authority responsible for the aerodrome that do not include instruction in an FSTD or visiting the aerodrome.

*(iii) category C — an aerodrome **or, where applicable, a runway**:*

(A) that requires additional considerations to those of a category B aerodrome; or

*(B) for which flight crew experience or qualification requirements stipulated by the competent authority responsible for the aerodrome include instruction in an FSTD or visiting the aerodrome or the **runway, where applicable.***

*(c) Prior to operating to a category B aerodrome **or, where applicable, runway,** (planned destination or required alternate), the pilot-in-command/commander should:*

- (1) comply with any requirements stipulated by the competent authority responsible for the aerodrome; and*
- (2) be briefed, or self-brief by means of programmed instruction, about the additional considerations applicable to operations to that category B aerodrome/**runway.** The completion of the briefing should be recorded. This recording may be accomplished after completion or confirmed by the pilot-in-command/commander before departure on a flight involving category B aerodrome(s) as destination or alternate aerodromes.*

*(d) Prior to operating to a category C aerodrome **or, where applicable, runways** (planned destination or required alternate), the pilot-in-command/commander should:*

- (1) comply with any requirements stipulated by the competent authority responsible for the aerodrome; and*
- (2) be briefed or self-brief by means of programmed instruction, about the additional considerations applicable to operations to that category C aerodrome **or runway;** and*
- (3) visit the aerodrome **or the runway** as an observer and/or undertake instruction in a suitable FSTD. The observer should occupy an observer's seat where installed. If an observer's seat is not available and cannot be installed, the pilot-in-command/commander may occupy a pilot seat to conduct the aerodrome visit with a suitably qualified commander nominated by the category C aerodrome operator.*

The completion of the briefing, visit and/or instruction should be recorded.