

Title:	Balloon Working Group Recommendations Paper Work Strand 2: Instructor and examiner requirements for instructing and examining pilots seeking the Balloon licence and/or ratings
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Purpose:	To set out a consolidated working group viewpoint regarding instructor and examiner requirements for supporting pilots seeking balloon licences, namely the base BPL, the Commercial Operations rating, and where applicable Commercial Passenger Ballooning privileges. This paper would form the basis of a chapter on this topic in the CAA Phase 2 balloon public consultation.
NOTE:	The content of this paper is draft material for discussion purposes only. While it constitutes the views of the Balloon Working Group, it does not represent, in whole or in part, the corporate views/policies of the Civil Aviation Authority.

Background

1. The consultation response document committed us in Phase 2 to review the requirements for the Commercial Rating for the Balloon Pilot Licence (BPL) as set out in UK Part-BFCL.215. Of particular focus is to ensure the unique needs of Commercial Passenger Ballooning (CPB) are adequately reflected, encapsulating the best aspects of the existing Commercial Pilot Licence (Balloons) [CPL(B)] that it will replace by September 2025.
2. A working group of balloon subject matter experts has been formed to put forward proposals in areas related to the base BPL, CPB and other aspects of commercial non-CPB (formerly known as 'aerial work') ballooning. The group comprised experts in the British Balloon & Airship Club, the Panel of Balloon Examiners, the Commercial Ballooning Association, and experts on instructing and examining of balloon pilots across the available licences and ratings.
3. This paper focuses on instructor and examiner requirements, specifically those for Flight Instructor (Balloons) [FI(B)] and Flight Examiner (Balloons) [FE(B)] instructing and examining pilots obtaining the base BPL, the commercial operations rating and, where applicable, CPB privileges. This paper can be read in conjunction with the Work Stream 1 paper on commercial balloon pilot licensing and the Work Stream 3 paper on the base balloon pilot licence and associated ratings.

Regulatory context

4. Requirements for instructors and examiners supporting balloon pilot licensing are set out in UK Part-BFCL Subparts FI and FE, while ANO licences are covered under ANO Schedule 8, with details for Examiners set out in Standards Document 40: Authorisation of Balloon & Airship Examiners.
5. There are 84 Balloon Instructors in the UK supporting approximately 400 balloon pilots, and a flow of about 50-80 students producing 20-30 newly qualified balloon pilots per year.
6. The Balloon Examiner cadre in the UK is very small, with just 18 examiners that fulfil the requirements of Standards Document 40 and Subpart FE. Of these, 12 examiners are qualified to examine candidates for the CPL(B), and 9 are qualified to examine candidates for the BPL Commercial Operation Rating. The average age of the Balloon Examiners is 67 years, so succession planning to maintain the sector is clearly a consideration. There might already be an issue with the shortage of qualified examiners in the UK, with anecdotal evidence of individuals finding it difficult to obtain the services of an examiner to meet revalidation requirements.
7. **Important note on scope:** this consultation focuses on amendments to *the current BPL licence and ratings*, with a view to updating the Part-BFCL regulation. We will describe transitional considerations facing pilots in implementing these proposed changes in a

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separate paper. However, while we do mention differences between the existing BFCL requirements and those of the ANO balloon licence system, it is *not* meant to describe the transition process from ANO licences to their equivalents in Part-BFCL which is already being managed by the CAA under an existing conversion process.

Topics

8. The working group discussed and recommended proposals for changes relating to the base licence, the commercial operation rating and instructor and examiner requirements across the following topics:
 - A. Instructor training requirements for instructing pilots seeking the commercial operation rating.
 - B. Proposal for Assistant Instructors for instructing student pilots seeking the Balloon Pilot Licence.
 - C. Instructor requirements for the extension of privileges to additional classes of balloons.
 - D. Examiner requirements for examining pilots seeking/maintaining the commercial operation rating (including CPB privileges).
 - E. Examiner requirements for the extension of privileges to additional classes of balloons.
 - F. Senior examiner requirements.
9. Participants tabled to the group written submissions across each of these areas, which were discussed in turn resulting in the positions set out in this paper.
10. It should be noted that once the Part-BFCL regulations are finally implemented in September 2025, the ANO references to the CPL(B) would be removed.

A. Instructor training requirements for instructing pilots seeking the commercial operation rating

Context/current situation

11. Currently balloon pilots wishing to become balloon instructors must comply with BFCL.300, which stipulates that pilots must hold a BPL including privileges, ratings and certificates for which the instruction is to be provided; be entitled to act as PIC in the balloons on which flight instruction is undertaken; and hold a valid FI(B) certificate. BFCL.315 sets out privileges and conditions for conducting flight instruction, and BFCL.320 stipulates prerequisites and requirements.
12. Under the ANO system, PPL(BA)s wishing to conduct instruction in balloons had to undertake the BBAC Instructor Training Course which has been evolved to comply with Part-BFCL.
13. The working group took the view that the *general* instructor requirements as currently set out in Part-BFCL are appropriate and do not require any change.
14. However, there was an agreement that training for instructing/examining in commercial operations needs to be enhanced, and that the experience requirements for instructors instructing pilots aspiring to conduct CPB should be significantly upgraded.
15. For commercial operations, participants argued that there is no specific training requirement or course for instructing for the commercial operation rating. The training course currently required under BFCL.315(a)(3) for night rating or tethered flight rating, and the training course provided at AMC1 BFCL.330(b) has specific content on Tethered flight and Night flying in Exercises 18 and 19 respectively. The group felt that there should be content mirroring this specifically for the Commercial Operation rating. Both these provisions should be amended accordingly.
16. For instructing taking place in a CPB environment (not when training candidates towards the initial granting of the commercial operation rating), the general experience prerequisites were considered to be inadequate given the unique demands and risks associated with passenger

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operations. Commercial ballooning experts within the working group argued that instructors training within a CPB environment should have minimum experience both as PIC in CPB line flying, and as PIC in the classes and hot-air group sizes in which instruction is taking place.

Proposals and rationale

17. There is already a training course at an ATO or DTO that FI(B) applicants must complete in accordance with BFCL.330(b), to which they must first pass a pre-entry assessment under BFCL.330(a) to assess their ability to take the course. The syllabus for this training is provided under AMC1 BFCL.330(b), and such new material in the training syllabus covering commercial operations would need to be created, but this could mirror existing material in the syllabus at Exercises 18 and 19 for tethered flight and night flying respectively. This material could be developed using the framework of those exercises as a starting point, but adding any additional material based on what we develop for the CPB refresher course for commercial pilots.
18. As regards the prerequisite experience for instructing in the CPB environment, there was considerable discussion over how this should be captured in the regulations. Some argued that other provisions in the regulations already achieve this; while others asserted that a clear minimum number of hours of CPB PIC time should be entrenched in the regulations.

Issues and discussion

19. There was little opposition to the instructor training requirements for commercial operations, especially given that much of what is proposed here was already done under the BBAC Instructor Training Scheme, so would-be instructors would not face a significant increase in requirements compared to what is currently the case.
20. There was considerable discussion about an appropriate minimum experience for instructors providing training within the CPB environment. Some argued for levels of CPB experience which most group members felt were more akin to examiner requirements, which do need the high experience as there is a much greater level of judgment involved. The hot-air balloon group size progression is already covered in the general commercial rating requirements, where commercial balloon pilots will have to demonstrate minimum PIC hours in CPB for each successive progression (if wishing to undertake CPB in the additional group). This engenders a level of CPB experience by an instructor who would be the commander of what will almost invariably be a CPB flight where groups C or D are involved.
21. There was a view that there should be a minimum level of commercial experience in each hot-air group size prior to instruction in that group. This protects against someone immediately instructing on a new (to them) group size without gaining any prior CPB experience in that group. The suggestions were:
 - Number of hours in CPB operations: 100 hours has been suggested, while others suggested as many as 400,
 - Number of hours in the hot-air balloon size group: 50 hours has been suggested, while others have suggested 75 hours.

Recommendation

22. There were no objections within the working group regarding the proposed additions requiring FI(B) candidates seeking to instruct for commercial ratings to undergo a specific training course. We will develop the syllabus details as part of AMC. Our recommendation is to revise Subpart FI as follows:

BFCL.315 FI(B) certificate – Privileges and conditions

(a) Subject to compliance of applicants with point BFCL.320 and with the following conditions, an FI(B) certificate shall be issued with privileges to conduct flight instruction for:

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- (1) a BPL;
 - (2) the extension of privileges to further classes and groups of balloons provided that the applicant has completed at least 15 hours of flight time as PIC in each relevant class;
 - (3) a night rating or a tethered flight rating **or a commercial operation rating**, provided that the applicant has received specific training in providing instruction for the relevant rating at an ATO or at a DTO; and
 - (4) an FI(B) certificate, provided that the applicant has:
 - (i) completed at least 50 hours of flight instruction on balloons; and
 - (ii) in accordance with the procedures established for that purpose by the competent authority, conducted at least one hour of flight instruction for the FI(B) certificate under the supervision and to the satisfaction of an FI(B) who is qualified in accordance with this subparagraph and nominated by the head of training of the ATO or the DTO.
23. The hot air balloon group size that an FI(B) can instruct in is already controlled by the ratings, groups and experience that the individual holds. For instructors of commercial operation rating candidates, either first issue or those undergoing refresher training, we believe that there should be a minimum number of hours of PIC flying in CPB operations. There is currently a debate about how many hours this should be:
- Some members of the working group suggested this should be 50 hours overall;
 - Others suggest this should be at least 200 hours overall including 50 hours per hot-air balloon group.
 - On balance, the CAA thinks that 50 hours provides an appropriate level of safety assurance when considering a candidate must still pass a skill test or proficiency check with an appropriately qualified FE(B).
24. In terms of this approach, an amendment to BFCL.315 as follows could achieve this:

BFCL.315 FI(B) certificate – Privileges and conditions

(a) Subject to compliance of applicants with point BFCL.320 and with the following conditions, an FI(B) certificate shall be issued with privileges to conduct flight instruction for:

- (1) a BPL;
- (2) the extension of privileges to further classes and groups of balloons provided that the applicant has completed at least 15 hours of flight time as PIC in each relevant class. **For the extension of privileges to Commercial Operations, a minimum of 50 hours as PIC of commercial passenger flights;**

Dissenting views?

25. There remained disagreement regarding the minimum qualifying experience:
- Number of hours in CPB operations: 400 hours
 - At least 200 hours overall including 50 hours per hot-air balloon group.

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Possible consultation questions

26. Do you agree with our approach of requiring instructors intending to instruct on commercial ratings to undergo specific training, along the lines of what is already required for tether and night ratings?
27. Possible answers:
 - Yes
 - No, prefer Part-BFCL to remain unchanged
28. Do you have any specific views on what should be covered in the training syllabus?
29. Do you agree with the view that instructors for the commercial operation rating should have a minimum number of 50 hours of PIC flying in CPB operations?
30. Possible answers:
 - Yes
 - No, prefer Part-BFCL to remain unchanged
31. Do you have any comments?

B. Proposal for Assistant Instructors for instructing student pilots seeking the Balloon Pilot Licence**Context/current situation**

32. It has been argued that the 12 hours of dual flight instruction by an FI(B) for the issue of the base BPL, as set out in BFCL.130 are too burdensome on both candidates and FI(B)s.

Proposals and rationale

33. To relax the burden on FI(B)s while still ensuring that BPL candidates receive a sufficient number of hours of good quality, standardised dual instruction, members of the working group have proposed the creation of an 'Assistant Instructor' authorisation, applicable to initial training for the BPL only, that would be able to undertake all but at least a minimum number of hours/flights of instruction that would be conducted by FI(B)s.
34. The Assistant Instructor authorisation [AI(B)] would be created in Part-BFCL and have relaxed prerequisites, training, issue and revalidation:
 - Prerequisite experience: they would require 50 hours of PIC balloon flying.
 - Training: an AI(B) training course at an ATO or DTO (syllabus would be developed as AMC). This would be light touch in nature that could be delivered in a short time (e.g. one day).
 - Privileges: provide training for the issue of a BPL excluding areas where an FI(B) qualification is specifically required. (The proposal mandates a minimum of 4 hours and 4 dual flights with an FI(B), with the balance of hours required being with either an FI(B) or an AI(B).)
 - Issuing process: an AI(B) authorisation would be issued by an ATO or DTO, for conducting training to BPL candidates registered with that ATO/DTO.
 - Revalidation: at least annually by the ATO or DTO that issued the authorisation using criteria that would be developed under new AMC.
35. Such an AI(B) could remove the burden from FI(B)s for conducting most of the dual flight training for BPL candidates. BFCL.130(b) setting out the BPL training instruction would be amended so that of the 12 hours of dual flight instruction required, only at least 4 hours and 4 flights would need to be undertaken with an FI(B).

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36. This AI(B) authorisation could have the added benefit of creating an experience pathway for progression to becoming an FI(B).

Issues and discussion

37. Initially, there was some objection to this proposal. There was objection about the need for any instructor to supervise more than the minimum 4 hours. That objection also questioned the need for such an authorisation in the first place, arguing that the current cadre of FI(B)s is sufficient to support the needs of the balloon community and therefore take-up of both candidates seeking this authorisation as well as BPL candidates seeking training by anyone other than FI(B)s would be quite limited.
38. It was also argued that creating a new level of instructing could create confusion among BPL candidates. There should only be one category of instructors, with training delivered by them only, and any additional categories could dilute the public's perceptions of the standard of instruction.
39. The rebuttal to both these points is that Assistant Instructors would reduce the burden on the instructor community while providing some level of assurance on the quality of instruction.
40. There was also a view that the AI(B) training course would be too burdensome. This was despite the reassurance that this could be made as straightforward and as accessible as possible, with an emphasis on a short (maximum one day) ground school.
41. There was also a point raised about the Assistant Instructor recency requirements. The view was that a 12 months revalidation period might be impractical and that a 24 month period might be more appropriate. It was also suggested that a minimum of at least one training flight should be conducted in a 12 month period in order to maintain the Assistant Instructor authorisation.

Recommendation

42. Despite these objections, the majority of the working group recommended that this proposal be taken forward to consultation. Regulatory amendments to create such a category would be relatively straightforward:
- A new BFCL.350 would be created setting out the Assistant Instructor Authorisation, its privileges, prerequisites and training that should be provided, and revalidation requirements. AMCs to this section would set out the syllabus for such training, and the revalidation process.
 - BFCL.300(a)(1)(ii) on flight instructor certificates would be amended to add the Assistant Instructor Authorisation.
 - Several consequential amendments would be necessary in BFCL.050 on recording of flight time, allowing Assistant Instructors to log flight time during which they act as an instructor in a balloon.

Dissenting views?

43. The objection to this recommendation held by a minority of the working group was that the creation of an Assistant Instructor authorisation was unjustified on the basis of the counterarguments presented above.

Possible consultation question

44. Do you agree with our approach of introducing an Assistant Instructor authorisation, and changing the minimum required number of dual training flights and hours to be undertaken with a FI(B) to at least 4 hours and 4 flights (instead of 12 hours)?
45. Possible answers:
- Yes

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- No, prefer Part-BFCL to remain unchanged

46. Do you have any comments?

C. Instructor requirements for the extension of privileges to additional classes of balloons

Context/current situation

47. It was suggested that the 15 hours of flight time in an additional class prior to extension of privileges for instructing by an FI(B) in that class, as set out in BFCL.315(a)(2), is not sufficient.

Proposals and rationale

48. To ensure that an FI(B) has sufficient experience prior to instructing on additional classes, it is proposed that the minimum hours required is increased to either 20 or 30 hours on the additional class and a minimum number of 15 flights on the additional class is added.
49. This adjustment to the current requirement would help to ensure that the FI(B) has experience of the additional class, prior to instructing. While this is important for all additional classes, it is pertinent to gas balloons where it is possible to do 15 (or 30) hours of flight time in one flight, but that would not give the instructor significant experience in various aspects of the aircraft (for example, set up, take off and landing).

Issues and discussion

50. There was consent within the group that this requirement should be adjusted due to the differences between the classes of balloons.

Recommendation

51. The group recommend adjusting the requirements to include a minimum of at least 10 flights, and the minimum hours to be either 20 or 30 hours. Following further discussion, the CAA favour setting this at 15 flights and 30 hours.
52. In terms of this approach, an amendment to BFCL.315 along the following lines could achieve this (note that there is a proposed addition to sub-paragraph (2) in Section A above, this recommendation is separate from that and does not change it):

BFCL.315 FI(B) certificate – Privileges and conditions

(a) Subject to compliance of applicants with point BFCL.320 and with the following conditions, an FI(B) certificate shall be issued with privileges to conduct flight instruction for:

(1) a BPL;

(2) the extension of privileges to further classes and groups of balloons provided that the applicant has completed at least **15 flights and 30** hours of flight time as PIC in each relevant class.

Dissenting views?

53. There were no dissenting views from any working group member to this recommendation.

Possible consultation question

54. Do you agree with our proposal to adjust the requirements for an instructor wishing to extend their privileges to instruct in additional classes, by changing the minimum requirements to be at least 15 flights and 30 hours of flight time (instead of 15 hours)?

55. Possible answers:

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- Yes
- No, prefer Part-BFCL to remain unchanged

56. Do you have any comments?

D. Examiner requirements for examining pilots seeking/maintaining the commercial operation rating (including CPB privileges)

Context/current situation

57. The working group looked at the current requirements for balloon examiners, including those examining candidates for the attaining and maintenance of commercial privileges, and considered possible changes.
58. Examiners under Part-BFCL are covered in Subpart FE, while the ANO system relies on CAA Standards Document 40 which sets out detailed requirements for examiners as well as Type Rating Examiners (TREs) and Revalidation Type Rating Examiners (RETREs).
59. The differences between the two regimes are quite significant, as summarised in Table 1 below.

Table 1: Comparison of examiner requirements for commercial privileges for ANO and Part-BFCL systems

	ANO Commercial Examiner	ANO TRE	Part-BFCL FE(B)
Hours required	600	300	250
Hours required on CPB flights	300	200	Not specified
Experience for Assessment of Competence for issue of instructor certificate	(Privilege granted at PPL(BA) examiner level)		350
Other experience required	1 year as PPL(BA) examiner		Current base licence FE(B) specific standardisation course module for commercial operations
Other requirements	Commercial Assessment of Competence Interview Board with Appointments Committee Induction training with an examiner Attendance at Panel of Examiners meetings	Commercial Assessment of Competence Interview Board with Appointments Committee Induction training with an examiner	Specific Assessment of Competence for Commercial Operations Skills Test/Proficiency Check

Proposals and rationale

60. The group took the view that there is scope to increase the Part-BFCL requirements within reason to bring it more into line with some aspects of the ANO system. While most of the requirements for Part-BFCL seem appropriate, the experience requirements in BFCL.415 seem too light compared to what seemed to work under the ANO system. While 600 hours under the ANO system was thought to be excessive, 500 hours was considered an appropriate compromise between the two regimes.
61. Moreover, there are limited additional requirements for examiners conducting skill tests and proficiency checks for attaining/maintaining CPB privileges which was felt to be suboptimal considering the unique risk characteristics of CPB and the importance of examiner contact in

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ensuring an appropriate application of standards. The working group supported:

- a minimum CPB experience of 200 hours as PIC on CPB operations;
- a minimum of at least 50 to 100 hours as PIC on CPB operations on the hot-air balloon group concerned, or on the group concerned and on larger groups combined; and
- this should be in addition to the specific training on an examiner standardisation course.

Issues and discussion

62. There was little opposition to the proposal of increasing the minimum prerequisite experience to something more in line with the ANO system. While there have been concerns about creating too much of a barrier for new examiners in the midst of an examiner shortage, the overwhelming view in the working group was that examiners should be required to have sufficient experience, and to not dilute standards in addressing workforce shortages.
63. However, the question of CPB experience both generally and at group level remains, with the number of hours in each group level being a matter of contention. It was agreed that a person with commercial examiner authority with minimal experience in a large balloon in a CPB context lacks the breadth of experience for undertaking commercial examinations in a large balloon, therefore potentially lacking the ability to make appropriate judgments of candidates. It could be appropriate to consider layering recency or currency requirements to guard against minimal hours in the distant past, however mandating a large number of hours of recency risks serving against high-hours examiners who may have relatively low recent experience by default. Moreover, it is observed that although most commercial examiners no longer undertake normal CPB line flying, they tend to amass appropriate experience examining to compensate. Following further discussion, introducing a 100 hour minimum on the group that they examine on was considered an appropriate compromise.
64. There was also a question as to whether examiners should also possess prerequisite experience as an instructor, as is the case presently under the ANO system. In Standards Document 40, for example a hot-air balloon PPL(BA) examiner must have completed not less than 10 hours flying instruction experience and have successfully trained 1 PPL(BA) candidate within 2 years preceding the date of application. Also in that document, what is termed a 'Professional Pilot Licence (Balloons) Examiner' [a CPL(B) examiner] must have held the duties of a PPL(BA) examiner for at least a year, which has those instructing prerequisites. There was considerable discussion on this matter, and the discussion centred around what this prerequisite is aiming to achieve. If the aim is developing skills as an examiner, the fact that examining and instructing are two entirely different activities requiring very different skills means making instructing a prerequisite of examining might not be the most efficient way of achieving the outcome. If the aim is developing the appropriate amount of competence from practical experience, then this could be achieved by minimum PIC time as a commercial or CPB pilot both generally and in the relevant hot-air group sizes. It was also suggested that having a good understanding of the instructional process can assist an examiner in their ability to assess a candidate, as well as this understanding enabling the examiner to advise the candidate in the case of an unsuccessful examination, in order to promote a future positive outcome.
65. Finally, there was discussion on the Standards Document 40 CPL(B) requirement for an interview with the examiner appointments committee. Some questioned what regulatory aim this requirement is designed to fulfil and whether this could be achieved by other means such as prerequisite experience. Others felt that the interview served a useful purpose.

Recommendation

66. To summarise we recommend that for all examiners (and notably those examining in the CPB environment):
- Minimum 500 hours experience as PIC in balloons (for all examiners);
 - Minimum 200 hours experience as PIC of CPB operations (when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks);
 - Minimum 100 hours experience as PIC of CPB operations in the group size (or larger

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sizes) being examined (when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks).

67. This would be achieved by the following amendments to BFCL.415:

BFCL.415 FE(B) certificate – Privileges and conditions

Subject to compliance of the applicant with point BFCL.420 and with the following conditions, an FE(B) certificate shall be issued upon application with privileges to conduct:

- (a) skill tests and proficiency checks for the BPL and skill tests for the extension of the privileges to another balloon class, provided that the applicant has completed **250 500** hours of flight time as pilot on balloons, including 50 hours of flight instruction covering the full syllabus of a BPL training course;
- (b) skill tests and proficiency checks for the commercial operation rating as specified in point BFCL.215, provided that the applicant ~~complies with the experience requirements set out in paragraph (a)~~ **has completed 500 hours of flight time as pilot on balloons, including at least 200 hours on Commercial Passenger Ballooning operations,** and has received specific training during an examiner standardisation course in accordance with point BFCL.430. **Validity per hot air balloon group is subject to having completed at least 100 hours Commercial Passenger Ballooning operations on the group concerned (or on the group concerned and on larger groups combined).**
- (c) assessments of competence for the issue of an FI(B) certificate, provided that the applicant has:
 - (1) completed **350 500** hours of flight time as pilot on balloons, including 5 hours of instruction to an applicant for the FI(B) certificate;
 - (2) received specific training during an examiner standardisation course in accordance with point BFCL.430.

Dissenting views?

68. There were no dissenting views from any working group member to this recommendation.

Possible consultation questions

69. Do you agree with our proposals to increase the requirements in Part-BFCL for examiners undertaking examining to pilots seeking Commercial Passenger Ballooning privileges to bring them more into line with the ANO requirements they will replace? Namely:
- Increase the minimum experience as PIC in balloons from 250 hours to 500 hours (slightly less than the ANO CPL(B) currently requires, to apply to all examiners);
 - Introduce a minimum 200 hours experience as PIC of CPB operations (when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks);
 - Introduce a minimum 100 hours experience as PIC of CPB operations in the hot-air balloon group size being examined (when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks).

Possible answers (repeated for each bullet point):

- Yes
- No

Do you have any comments? (Not repeated)

E. Examiner requirements for the extension of privileges to additional classes of balloons

Context/current situation

70. Following the discussion about instructor requirements for additional classes detailed in Section C, the working group discussed the requirements for balloon examiners wishing to extend their privileges to undertake skill tests for the extension of privileges to another balloon class.
71. Part-BFCL.415(a) has overall requirements that have to be met in order to undertake skill tests for the extension of privileges to another balloon class, but does not have any requirements that are specific to any additional classes. The ANO system, in addition to a requirement of 500 hours in hot air balloons, requires 100 hours in the specific class of balloons (gas, hot-air airship or combination).

Proposals and rationale

72. The group took the view that there is scope to increase the Part-BFCL requirements in this area, but no specific proposals were made by the group. The CAA have considered this further, and following further discussion, propose that a minimum of 25 flights and 50 hours of flight time in the additional class should be required, prior to the examiner gaining the privilege to undertake skill tests in the additional class.

Issues and discussion

73. There was concern that if this was not reviewed, there could be a requirement at the instructor level for instruction on additional classes, but no requirement at the examiner level. This could give rise to a situation where an examiner who holds the additional BPL class rating but has minimal experience on that class is able to examine in the additional class.

Recommendation

74. The CAA recommend that a requirement of a minimum of 25 flights and 50 hours of flight time on the additional class prior to extension of privileges is added.
75. This would be achieved by the following amendment to BFCL.415 (noting that there are proposed changes in the sub-paragraphs which are detailed in Section D above, and which are included in the regulation extract below):

BFCL.415 FE(B) certificate – Privileges and conditions

Subject to compliance of the applicant with point BFCL.420 and with the following conditions, an FE(B) certificate shall be issued upon application with privileges to conduct:

- (a) skill tests and proficiency checks for the BPL and skill tests for the extension of the privileges to another balloon class, provided that the applicant has completed ~~250~~ 500 hours of flight time as pilot on balloons, including 50 hours of flight instruction covering the full syllabus of a BPL training course, and for the extension of privileges to another class, has completed 25 flights and 50 hours of flight time as pilot on that class of balloon;

[No changes relating to this recommendation in the remaining paragraphs.]

Dissenting views?

76. There were no dissenting views from any working group member to this recommendation.

Possible consultation questions

77. Do you agree with our proposal to increase the requirements in Part-BFCL for examiners undertaking examining in an additional balloon class by requiring a minimum of 25 flights and 50 hours of flight time as pilot on that additional class?

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78. Possible answers:

- Yes
- No, prefer Part-BFCL to remain unchanged

79. Do you have any comments?

F. Senior examiner requirements

Context/current situation

80. The assessment of competence of examiners themselves is currently provided by BFCL.445 and their validity, revalidation and renewal requirements in BFCL.460. The regulations include AMC setting out an assessment of competence syllabus including briefing, conduct of skills test, and/or proficiency check required to record and issue the appropriate certificate.
81. However, there is currently some inconsistency over who oversees these activities. BFCL.445 specifically mentions the role of a Senior Examiner 'specifically authorised by the CAA' (or a CAA inspector) to conduct assessments of competence. The requirements for this qualification of Senior Examiner are embodied in AMC1 BFCL.445; BFCL.460. However BFCL.460 for revalidation/renewal does not mention this, instead referring to 'an examiner specifically authorised to do so by the CAA' (not the Senior Examiner from BFCL.445) for conducting the 24-month skills test, proficiency check or assessment of competence, and an 'ATO or a DTO approved by the CAA' for providing an examiner refresher course.
82. Moreover, the AMC providing the Senior Examiner requirements lack clarity or regulatory certainty on what constitutes an acceptable level of experience that a senior examiner should reasonably be expected to possess. The AMC states 'a level acceptable to the CAA' and this should be reworked to something clearer.

Proposal and rationale

83. An argument has been made within the working group that the 'Senior Examiner' role should be used for both initial issue and revalidation/renewal of examiner certificates.
84. In relation to the experience requirements for Senior Examiners, the following were considered appropriate by the working group:
- 1,000 hours of PIC flight time, of which
 - [for examiners seeking privileges to examine CPB candidates], there was a debate within the working group as to the minimum hours PIC flight time in CPB operations: some suggested 200 hours, while others thought this should be at least 500 hours. On balance, the CAA are minded to favour the 500 hours minimum, considering the importance of this role, but consideration needs to be given that this higher amount could create an unnecessary barrier that might result in a paucity of senior examiners in the future.
85. Beyond experience, there was a view that progression to Senior Examiner authorisation should not be based automatically on experience, but should remain a decision by the CAA.

Issues and discussion

86. Minimum requirements for Senior Examiners seeking privileges to examine commercial non-CPB candidates: given that someone initially wishing to attain the commercial operation rating would be assessed to be capable of undertaking CPB flying (even if they have less than 100 hours PIC at the time), an examiner with BFCL.415(b) able to assess skill tests and proficiency checks for the commercial operation rating is required. There is no need to differentiate for CPB vs non-CPB for a FE(B), and therefore no need for a SE(B) to have this differentiation.
87. There is also a question as to whether the Senior Examiner requirements should be set out in its own heading in the regulations, rather than as part of the Examiner assessment of competence and validity, revalidation and renewal sections. This would provide greater clarity of the role of Senior Examiners.

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Recommendation

88. We recommend rewording the regulations so that:
- Senior Examiners (and inspectors from the CAA) are the only individuals who conduct those FE(B) assessments of competence, both for initial issue and revalidation/renewal of examiner certificates; and
 - Senior Examiners have a minimum experience requirement as proposed above; and
 - Senior Examiners are appointed by the CAA as the CAA require.
89. These changes could be achieved with the following amendment to BFCL.460 and a new BFCL.470 setting out possible wording for rules and guidance material in relation to Senior Examiners:

BFCL.460 FE(B) certificate – Validity, revalidation and renewal

(a) An FE(B) certificate shall be valid for five years.

(b) An FE(B) certificate shall be revalidated if its holder has:

(1) during the validity period of the FE(B) certificate, completed an examiner refresher course which is provided either by the CAA or by an ATO or a DTO and approved by the CAA, during which the holder shall receive theoretical knowledge instruction for refreshing and updating the knowledge relevant for balloon examiners; and

(2) within the last 24 months preceding the end of the validity period of the certificate, conducted one skill test, proficiency check or assessment of competence under the supervision and to the satisfaction of an inspector from the CAA **or a senior examiner specifically authorised to do so by the CAA.**

BFCL.470 SE(B) certificate

The CAA shall appoint, where required, Senior Examiners that are specifically authorised for assessments of competence of FE(B)s and oversee their validity, revalidation and renewal.

AMC1 ~~BFCL.445; BFCL.460 FE(B)~~ BFCL.470 SE(B) certificate

[Text as current AMC1 BFCL.445; BFCL.460]

GM1 BFCL.470 SE(B) certificate

An applicant for the SE(B) certificate should have completed 1000 hours of flight time as pilot on balloons, including, when assessing for the purpose of the issue or revalidation of examining privileges for the commercial operations rating, at least 500 hours on Commercial Passenger Ballooning operations.

Dissenting views?

90. There were no dissenting views from any working group member to this recommendation.

Possible consultation question

91. Do you agree with our approach to reword the regulations on the assessment of competence for examiners so that:

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- Senior Examiners, in addition to an inspector from the CAA, are the only individuals who conduct FE(B) assessments of competence, both for initial issue and revalidation/renewal of examiner certificates; and
- In addition to specific authorisation by the CAA, Senior Examiners must have a minimum experience requirement of 1,000 hours of PIC flight time, of which [for senior examiners seeking privileges to examine commercial operations candidates] at least 500 hours PIC flight time in CPB operations,

Possible answers (repeated for each bullet point):

- Yes
- No, prefer Part-BFCL to remain unchanged

Do you have any comments? (Not repeated)