



## The Challenge for the General Aviation

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- IAOPA (Int. Council of Aircraft Owner & Pilot Associations)
  - Representation of General Aviation in 72 countries
  - 450'000 Members
- CPL – FI – FE (all VFR)
- CEO AOPA Switzerland since 1996
- LPRI TF: Member



## LPRI: The GA Pilot's view

- IFR: ( ✓ )
- VFR: ✖
  - English Language
  - Applicable Airspace



## English Language



## ICAO Doc 9835 (Manual on Impl.of LPR, 2<sup>nd</sup> edition):

- 4.3.5
  - Radiotelephony communications shall be conducted either in the language of the station on the ground **or in English.**
  - ICAO provisions do not in any way limit the use of a national, regional or local language but **recognize the practical requirement for English to be available** for the many pilots who do not speak the national language of a particular State.
- 4.4.12
  - There is **no language proficiency Standard applicable for glider** and free balloon pilots...



## EASA, Flight Crew Licensing

### **FCL.055 Language proficiency**

Aeroplane, helicopter, powered-lift and airship pilots required to use the radio telephone shall not exercise the privileges of their licences and ratings unless they have a language proficiency endorsement on their licence in **either English or the language used for radio communications** involved in the flight. The endorsement shall indicate the language, the proficiency level and the validity date.



## Facts/Reality

- Some States impose the use of the national language for radio communications (mostly aerodromes) and do not allow English as additional language.
- The use of English at those aerodromes is fined.
- The vast majority of European States accept English as additional language at all stations.



## Burdens and hurdles

- Not feasible for pilots to have Radiotelephony and Language Proficiency Endorsements in various national languages
- Discriminatory for General Aviation
- Regulation without safety improvement
- Decrease of safety due to uncertainty



## Conclusion 1

**Beside any national languages,  
English shall be accepted at all  
radio stations.**



## Applicable Airspace



## ICAO Doc 9835 (Manual on Impl.of LPR, 2<sup>nd</sup> edition):

- 4.4.6  
The language proficiency requirements apply to any language used in international aeronautical radiotelephony communications, but **not** to any language used in **domestic** operations.
- 4.4.12  
There is **no language proficiency Standard applicable for glider** and free balloon pilots...
- Appendix A (Extract from Annex 1, 1.2.9.1 Language Proficiency)  
Aeroplane, airship, helicopter and powered-lift pilots and those flight navigators who are **required to use** the radio telephone aboard an aircraft shall demonstrate the ability to speak and understand the language used for radiotelephony communications.

# LPRI – The Challenge for the General Aviation



## ICAO Annex 11: Airspace classes

### For aircraft separation:

- **IFR:**  
Air Traffic Control:  
Radio communication  
required
- **VFR:**  
See & Avoid:  
Radio communication  
not required

Class	Type of flight	Separation provided	Service provided	Speed limitation*	Radio communication requirement	Subject to an ATC clearance
A	IFR only	All aircraft	Air traffic control service	Not applicable	Continuous two-way	Yes
B	IFR	All aircraft	Air traffic control service	Not applicable	Continuous two-way	Yes
	VFR	All aircraft	Air traffic control service	Not applicable	Continuous two-way	Yes
C	IFR	IFR from IFR IFR from VFR	Air traffic control service	Not applicable	Continuous two-way	Yes
	VFR	VFR from IFR	1) Air traffic control service for separation from IFR; 2) VFR/VFR traffic information (and traffic avoidance advice on request)	250 kt IAS below 3 050 m (10 000 ft) AMSL	Continuous two-way	Yes
D	IFR	IFR from IFR	Air traffic control service, traffic information about VFR flights (and traffic avoidance advice on request)	250 kt IAS below 3 050 m (10 000 ft) AMSL	Continuous two-way	Yes
	VFR	Nil	IFR/VFR and VFR/VFR traffic information (and traffic avoidance advice on request)	250 kt IAS below 3 050 m (10 000 ft) AMSL	Continuous two-way	Yes
E	IFR	IFR from IFR	Air traffic control service and, as far as practical, traffic information about VFR flights	250 kt IAS below 3 050 m (10 000 ft) AMSL	Continuous two-way	Yes
	VFR	Nil	Traffic information as far as practical	250 kt IAS below 3 050 m (10 000 ft) AMSL	No	No
F	IFR	IFR from IFR as far as practical	Air traffic advisory service; flight information service	250 kt IAS below 3 050 m (10 000 ft) AMSL	Continuous two-way	No
	VFR	Nil	Flight information service	250 kt IAS below 3 050 m (10 000 ft) AMSL	No	No
G	IFR	Nil	Flight information service	250 kt IAS below 3 050 m (10 000 ft) AMSL	Continuous two-way	No
	VFR	Nil	Flight information service	250 kt IAS below 3 050 m (10 000 ft) AMSL	No	No

\* When the height of the transition altitude is lower than 3 050 m (10 000 ft) AMSL, FL 100 should be used in lieu of 10 000 ft.



## Facts/Reality

- Some States require a Language Proficiency Level 4 when using any radio station even in airspaces without ATC.
- Radio Communication in uncontrolled environments (airspaces) are mostly blind transmissions.



## Burden and hurdles

- Neither clearances nor binding instructions are broadcasted in an uncontrolled environment (airspace).
- Blind transmitting does not require a language proficiency.
- Regulation without safety improvement



## Conclusion 2

**Language Proficiency Level 4  
in English in Airspaces Class  
Delta and higher only.**



## Proposal of IAOPA

**No State shall implement additional rules to the ICAO regulations concerning Language Proficiency.**

Therefore:

- **At least English Language shall be allowed at all radio stations.**
- **No Language Proficiency Level 4 in Airspaces Class Echo and lower.**



**Many thanks for your attention**