

**GAP ANALYSIS QUESTIONNAIRE ON
APPROVAL OF AVIATION TRAINING ORGANIZATIONS**

Background

The ASEAN Mutual Recognition Arrangement on Flight Crew Licensing (MRA-FCL) was signed by ASEAN Transport Ministers on 13 Oct 2017 in Singapore. This document lays down the broad principles and framework to facilitate mutual recognition of approvals, certificates and licences related to flight crew licensing.

4 Implementing Protocols (IPs), containing detailed procedures and scope, will be developed in sequence to support the implementation of the MRA-FCL:

1. Qualification of flight simulation training devices (FSTDs)
2. Aviation training organizations
3. Safety oversight capabilities of NAA
4. Conversion of flight crew licences

The questionnaire will identify similarities and differences between regulations and procedures amongst ASEAN Member States on the approval of aviation training organizations. This would support the development of draft standards and procedures for mutual recognition of such training organizations qualified by ASEAN Member States under IP 2.

This gap analysis questionnaire has 11 sections, and will take about 1hour to complete.

For the purpose of this questionnaire, as we are attempting to understand the system in the State as comprehensively as possible, as such, we are differentiating between Flight Training Organizations (FTOs), and Type Rating Training Organizations (TRTOs), where FTOs are organizations that conduct abinitio training for flight crew, and TRTOs are organizations that conduct type rating training for flight crew.

Section 1: Landscape scan

1. How many training organizations hold the CAA's approval? List the training organizations and the type of training approvals.

I. Domestic ATO

1. Domestic Training Organization for theoretical related to ATC and others training specifications.

II. Foreign ATO

1. Fast Aviation Academy (FAA), Philippines

A) TRTO

1. AEROSTAR training service , USA

2. GLOBLE TRAINING AVIATION (GTA), Indonesia

B) Maintenance Training Organization (MTO)

1. D aviation training organization for AME, Malaysia

2. Do these organizations also hold other State's approvals (e.g. EASA, FAA, other ASEAN Member States)

Yes, these organizations also hold other State's approvals:
- ASEAN Member States

3. What type of training organizations are these? (i.e. FTO, TRTO)

a. How many are in the country? How many are overseas? If overseas, where?

b. How many are foreign training organizations that hold your state's approval?

a) Inside country we don't have FTO, TRTO yet. As for at overseas we have for a types FTO in Philippines and for type TRTO in Indonesia and USA.

b) Foreign training organizations that hold Cambodian CAA's approval:

1. Philippines
2. Indonesia
3. Malaysia
4. USA

4. What type of training approvals does the CAA issue? (e.g. CPL, MPL, IR, A320, A330 etc.)

Type of training approvals that the CAA issued are CPL, ~~MPL~~, IR, A320, ATR 72

5. If the CAA does not issue training organization approvals, how does the CAA validate other State's training for the purpose of a license issuance.

We just validated License (base on license holder rating) and converted licenses only.

Section 2: Regulations and processes

1. Where are your CAA's regulations for training organization approval? What other publications are there relating to training organizational approval (include training programmes approval, UPRT, SMS, Quality assurance system etc.)

My CAA's regulations for training organization approval placed in:

- CCAR part 2 -Approved on June, 2016
- CCAR Part 3 -Approved 2009
- PLPM approved 18 Mar 2019
- ICAO Doc 9625 (FSTD)
- ICAO Doc 9841 (ATO)

2. What is the validity period of a training organization approval?

The validity period of a training organization approval is 1 year.

3. What are the fees and charges for a training organization approval? Please describe in the following table.

FTO (initial)	
FTO (renewal)	
FTO (addition of training approval)	
FTO (addition of geographical training location)	
TRTO (Initial)	Level1 = 10 000 USD, Level2 = 5 000 USD
TRTO (renewal)	Level1 = 10 000 USD, Level2 = 5 000 USD
TRTO (addition of training approval)	
TRTO (addition of geographical training location)	

Section 3: Requirements on the organization

1. Does the CAA have requirements on aspects such as the organizational structure of the training organization, key appointment holders, minimum qualification of these appointment holders, instructor to student ratio?

Yes, the CAA have requirements on aspects such as the organizational structure of the training organization, key appointment holders, minimum qualification of these appointment holders, instructor to student ratio.

2. Does the CAA have requirements for instructors? Please describe in the following table.

Instructor	Minimum qualification	Qualification process
Ground instructor	CCAR II, para 2.3.11.9	The operators shall request to CAA
Flight instructor - CPL	CCAR II, para 2.3.11.2	The operators shall request to CAA
Flight instructor – MPL Phase 1 to 4		
Flight instructor – Type rating	CCAR II, para 2.3.11.3	The operators shall request to CAA
Synthetic flight instructor – MPL phase 2 to 4		
Synthetic flight instructor – Type rating	CCAR II, para 2.3.11.6, 2.3.11.8	The operators shall request to CAA

Section 4: Manuals and Documentation

1. What manuals or documentation does the CAA require the training organization to have? E.g. operations manual, training manual, quality manual, SMS manual.

The manuals or documentation that the CAA require the training organization to have:

- operations manual,
- training manual,
- quality manual,
- SMS manual

Section 5: Training programme requirements

1. State the training requirements for each type of training approval, including experience requirements and mandatory training, such as UPRT, MPL Phases of training etc.

Type of training	Training requirements
CPL	CCAR II, para 2.3.5.1, 2.3.5.2
CPL with IR	
MPL	CCAR II, para 2.3.6.1, 2.3.6.2
Type rating training	CCAR II, para 2.3.2.4

Section 6: Training facilities, equipment, aircraft requirements

1. What type of simulators are being used for training? What are the credits given for the training/test?

Type of Training/ Tests	Type of FSTD used	Credits given for training / tests conducted in the FSTD	Type of Approval given to the FSTD (e.g. Qualification, User Approval, Approved through the training org)
CPL	Yes	Yes	Yes
IR	Yes	Yes	Yes
MPL – Phase 1			
MPL – Phase 2			
MPL – Phase 3			
MPL – Phase 4			
Type Rating Training	Yes	Yes	Yes

2. What are the CAA’s requirements for training facilities such as classroom, briefing rooms?

Yes, the CAA’s requirements for training facilities such as classroom and briefing rooms.

Section 7: Examiners

1. What are the CAA’s requirements for qualifying to be an examiner? E.g. CAA examiner, examiner appointed in industry, single pilot examiner, multi pilot examiner. What are the experience requirements for each examiner?

The CAA’s requirements for qualifying to be an examiner.

- CAA examiner
- Examiner appointed in industry
- Multi pilot examiner

The experience requirements for each examiner in CCAR 2:

- Para 2.3.12 DESIGNATED PILOT EXAMINERS
- 2.3.12.1 General requirements
- 2.3.12.2 (FE)
- 2.3.12.3 (TRE)
- 2.3.12.4 (CRE)
- 2.3.12.5 (IRE)
- 2.3.12.6 (SFE)
- 2.3.12.7 (FIE)

2. What is the CAA's qualification process of an examiner?

- The qualification/requirement process of an examiner in CAAR II, para 2.3.12.2

3. What is the CAA's appointment term for an examiner?

- It depend on requested of the operators

4. What is the CAA's re-appointment criteria for an examiner?

- CAA will re-appointment when the examiner approved certificate expiry

5. How does the CAA oversight the examiners?

The CAA oversight the examiners on :

- Such check lists,
- The way to fill out of examination forms and
- Examination reports.

Section 8: Record keeping system

1. What are the CAA's requirements for record keeping? Please state what records need to be kept, and for how long?

1. Copy of pilot's license and Validation certificates,
2. Medial certificates,
3. Logbooks, passport & Visa permit,
4. Knowledge and skill test results,
5. Recurrent training documents,
6. Verification letter from CAA of states issued license.
7. All these documents shall keep for 5 years

Section 9: Quality Assurance System

1. Does the CAA require the training organization to implement a Quality Assurance System?

Yes, the CAA require the training organization to implement a Quality Assurance System.

2. What are the CAA's key requirements for the Quality Assurance System?

Yes, the CAA's key requirements for the Quality Assurance System.

Section 10: Safety Management System
1. Does the CAA require the training organization to implement a Safety Management System?
Yes, the CAA require the training organization to implement a Safety Management System.
2. What are the CAA's criteria for a Safety Management System?
<ul style="list-style-type: none"> - Organization structure - Qualification of instructors - Training programs - Record system - Facilities for supporting
Section 11: CAA oversight
1. Does the CAA implement a safety oversight programme on the training organizations who hold your approval? E.g. surveillance programme.
<ul style="list-style-type: none"> - The CAA implement a safety oversight programme on the training organizations. - Inspectors hold approval
2. How often does the CAA conduct safety audits/ inspections on an organization?
<ul style="list-style-type: none"> - The CAA conduct safety audits once per year
3. How does the CAA address safety/ training issues by the training organization? Is there a difference in procedure for major vs minor safety issues?
<ul style="list-style-type: none"> - CAA will address safety after surveillance /audit when there is no major finding on the organization. - There are difference in procedure for major vs minor safety (major issue finding level I, minor finding level II).
4. Does the CAA have an enforcement policy in handling non-compliance?
Yes, the CAA have an enforcement policy in handling non-compliance.

Please complete this questionnaire prior to the ARISE Plus 4th MRA FCL workshop scheduled for 3 – 5 March in Bangkok, Thailand. States would be invited to present their answers to the questionnaire, at

the workshop. Should you have queries regarding the questionnaire, please feel free to contact Ms Nicole Benny or Mr Clyde Ong (Nicole_Benny@caas.gov.sg or Clyde_Ong@caas.gov.sg).