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Deborah H Martin,
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[Via email: deborah.martin@tc.gc.ca](mailto:deborah.martin@tc.gc.ca)

Ms. Martin:

The Helicopter Association of Canada would like to request a change to the current solo requirement for the Commercial Helicopter licence. Our rationale for this request is set out below.

Executive Summary

The Helicopter Association of Canada proposes that a reduction in the current solo flight requirement for a commercial helicopter pilot licence, would permit valuable additional dual training to be delivered to students, within the existing minimums of the approved course structure. We believe that this would result in an increase in both the proficiency and safety of newly licensed pilots in Canada.

Background

The current Transport Canada training requirements for an approved commercial helicopter pilot's licence course include a minimum of 55 hours dual and 35 hours of solo flight within the 100 hour course structure.

When Transport Canada first reduced the 150 hour ICAO training requirement to 100 hours for an approved course, we believe that the assumption was, that the rotary wing approved course would then be similar in nature to the equivalent fixed wing approved course. However the dual and solo flight requirements for each of these two categories are not aligned.

When the Fixed Wing approved program was introduced, the total number of hours was reduced by 25% (200 hours to 150 hours), and the solo requirement was reduced by 30% (100 hours to 70 hours). The effective reduction in available dual time, therefore, was a decrease of 20 hours (100 hours to 80 hours), or 20%.

When the Rotary Wing approved program was introduced, the total number of hours was reduced by 33% (150 hours to 100 hours), and the solo requirement was not reduced at all (still 35 hours). The effective reduction in available dual time was a decrease of 50 hours (115 hours to 65 hours), or 43%!

There have been on-going discussions within the helicopter training community and Transport Canada since 1989 when a new requirement for 10 hours of dual instrument training (to be included within the 55 hours dual minimum) was introduced. A number of years later, an additional requirement for sling load operations was introduced to the course, again without any alteration of the hourly ratio of dual/solo minimums.

Adding to the burden of these regulatory requirements, industry demands for more proficient off-airport and emergency handling skills have made it increasingly difficult for flight instructors to develop adequate student proficiency with 35% of the minimum training period taken up with mandatory solo practice.

Our HAC Flight Training Committee believes that while some solo experience is necessary for the student pilot, the value of some additional dual instruction in terms of increased student proficiency, will outweigh the main benefit of solo practice, which is increasing a student's self-confidence.

Recently a survey was sent out to all the FTU's in Canada and the response was overwhelmingly in favour of reducing the solo requirement to allow for more dual training to be included in the basic training course. The feeling among industry instructors was that a higher level of proficiency and safety could be achieved by spending more dual time with the candidate, and that such a high proportion of solo time in the course was thought to be inefficient and less productive.

Proposal

At the most recent meeting of HAC's Flight Training Unit and Licensing Committee in November 2016, our committee members agreed to invite Transport Canada to reconsider the current 35 hour solo requirement for approved courses of Rotary Wing training.

In the interests of promoting superior helicopter instruction methods in Canada, and to encourage safe flying practices and advanced skill levels, with tangible benefits that would be carried forward to industry, it would enhance the Canadian approved Rotary Wing Commercial Helicopter Pilot training program, if the existing 35 solo hour requirement were to be reduced, so that additional dual training experience could be delivered to the students within the current 100 hour minimum.

We respectfully ask that Transport Canada consider options that might achieve this change at its earliest convenience.

Regards,

A handwritten signature in blue ink, appearing to read "Fred L. Jones". The signature is fluid and cursive, with the first name "Fred" being the most prominent.

Fred L. Jones BA LLB
President and CEO
Helicopter Association of Canada