GA1320

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Posted on 06.12.2022 by Steve Forward

**Category:** General Aviation

Report TitleStudent EC rebate eligibility

### **Initial Report**

**CHIRP** 

The CAA is to be applauded for instigating a scheme for a rebate towards the cost of an EC device. This (I understand) has recently been extended. However, the rebate is only available to existing licence holders or aircraft owners. As Head of Training for a progressive ATO, I have been asked by several student pilots if they could be eligible for the EC rebate, since they can see the huge benefits of such devices. In fact, some have taken the "alternative route" and actually coerced an existing licence holder to make the rebate application on their behalf where the licence holder has chosen not to purchase the device (for either financial or privacy reasons)!

The current rebate eligibility criteria (in my view) is a barrier to flight safety, and the scheme should be extended to allow student pilots to participate for the following reasons (which also counter some of the foreseen arguments "against"). I offer the following observations:

- 1. Increasing the EC population will only help achieve the EC goal the more aircraft that are equipped, the greater the resolution of EC.
- 2. By extending the scheme to student pilots who have obtained a CAA reference number the scheme has an audit trail in still only allowing one rebate per person.
- 3. By offering the scheme to student pilots, it allows the training organisation to integrate such devices into the students' flight training to ensure the device (along with moving map technology) is used effectively and within context. In particular to avoid the situation of "eyes in the cockpit too much", and the limitations of EC at the present time (not all aircraft will be observed). In addition, best practice can also be taught, such as configuring the devices to provide aural warnings via Bluetooth which also counters any Threats and Errors associated with a perceived "down-side" of using such devices. Personally, I have incorporated all of these into our ATO PPL syllabus so all students get trained as a matter of course in these devices at our organisation. Even if a student pilot "just" uses the device to provide EC "out" it would enhance the visibility of that student aircraft including giving more situational awareness to existing EC users of a student's actions (which may or may not be in accordance with standard practices)!
- 4. Hindsight is a wonderful thing. Perhaps it would have been better placed to offer the scheme initially to students in any event to ensure training in the use and best practice of the device

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- was undertaken. At present, there will be many pilots using devices falling into the trap of relying on EC in its entirety and with a consequential lack of "lookout".
- 5. Perhaps a better option would be to offer the rebate scheme to anyone who holds a CAA reference number, and can provide proof of training in the device for the reasons above!
- 6. In the current financial climate, with increasing fuel and insurance costs (to name but two), it is highly unlikely that a training organisation itself will spend the money on equipping their fleet of aircraft with EC. Hence, individual use of EC should be encouraged, and not limited in its present form.
- 7. Existing licence holders and aircraft owners have already had ample opportunity to partake in the scheme, so opening the scheme up to include those detailed above would not be retracting the funding for those it was initially offered to. Indeed, if the scheme has been extended due to the lack of uptake and the existing finds still being available, then this also signifies the eligibility should be widened.

For all of the reasons above, I would urge the CAA to extend the scheme as detailed above, and would encourage all training organisations to embrace (and hence include in their training programmes) new technologies that pilots will make use of once they have gained their licence – whether trained in their use or not!

#### **Comment**

The introduction of EC equipment has potential to be one of the biggest contributors to aviation safety in recent years. CHIRP agrees that it would be highly desirable for students to be included in the EC rebate scheme so that they had the guaranteed opportunity to gain familiarity with such equipment under the guidance of an instructor if the aircraft they were using was not otherwise equipped. With this in mind, CHIRP is a bit underwhelmed by DfT's response and have written formally to DfT (info CAA) to represent this view and urge that they consider including students in any future review of the rebate scheme. In parallel, we'd urge clubs, training organisations and aircraft owners to explore the use of the EC rebate to equip their aircraft.

#### **Key Issues**

### **Dirty Dozen Human Factors**

The following 'Dirty Dozen' Human Factors elements were a key part of the CHIRP discussions about this report and are intended to provide food for thought when considering aspects that might be pertinent in similar circumstances.

**Resources** – inability of students to access the EC rebate scheme.

**Awareness** – use of EC to improve awareness of aircraft in their vicinity.

# lack\_of\_resourcesResources

CHIRP

## ${\color{red}loss\_of\_awareness} {\color{blue} Awareness}$



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