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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





ICAO Doc 9835 (Manual on Impl.of LPR, 2nd 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

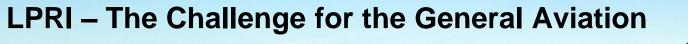
- Some States impose the use of the national language for radio communications (mostly aerodromes) and do not allow English as additional language.
- The use of English at those aerodromes is fined.
- The vaste majority of European States accept English as additional language at all stations.

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, 2nd 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.

Class	Type of flight	Separation provided	Service provided	Speed limitation*	Radio communication requirement	Subject to an ATC clearance
Α	IFR only	All aircraft	Air traffic control service	Not applicable	Continuous two-way	Yes
в	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
с	IFR	IFR from IFR IFR from VFR	Air traffic control service	Not applicable	Continuous two-way	Yes
	VFR	VFR from IFR	 Air traffic control service for separation from IFR; 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.						

ICAO Annex 11: Airspace classes

For aircraft separation:

• IFR:

Air Traffic Control: Radio communication required

• VFR:

See & Avoid: Radio communication not required

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