



ENAC
Protocollo del 15/04/2011
0048541/DG

The Director General

The Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec
CANADA H3C 5H7
Fax: 0015149546077

Copy to: Luis Fonseca de Almeida
ICAO Regional Director
European and North Atlantic Office
3 bis villa Emile Bergerat
92522 Neuilly-sur-Seine Cedex
FRANCE
Fax 0033146418500

Delegation of Italy
ICAO Headquarters
Montreal, Quebec
CANADA H3C 5H7
Fax 0015149546769

Subject: 37th Session of the Assembly – Resolution A37-10: Proficiency in the English
Language used for radiotelephony (ref. AN 12/44.6-11/1).

Dear Sir,

Following our letter 35934/CSS dated 22 March 2011 please find herein enclosed the revised Language Proficiency Implementation Plan for Italy.

The revision was deemed necessary in order to add the information on the number of endorsements given on licenses and the record of unlicensed personnel.

A few editorial changes have been introduced as well.

Accept, Sir, the assurance of my highest consideration.

Alessio Quaranta

Enclosures: Language Proficiency Implementation Plan



ENAC

LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

Ed.: 5 March 2011
Rev. 1: 15 April 2011

Handwritten signature or initials in the bottom left corner.



LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

SUMMARY

Italy is fully compliant with the Language Proficiency Requirements (LPR) as defined in ICAO Annex 1 Appendix 1 as far as air traffic controllers and pilots holding a commercial licence are concerned. Full compliance will be assured from 31 December 2011 for aeronautical station operators and for pilots holding private license (included IR privileges) involved in international operations.

Compliance is shown by regulatory framework.

Pilots

JAR FCL-1 and FCL-2 (endorsed by ENAC Regulation "Regolazione tecnica in materia di rilascio e rinnovo di licenze di pilotaggio) requires for pilots with Radiotelephony licence to be checked for proficiency language.

Moreover, European Union has approved Regulation 216/08 to extend European Aviation Safety Agency responsibility to pilot licensing and operators certification among the others. The amended regulation includes in Annexes 3 and 4 (Essential requirements for pilot licensing and operators certification) proficiency requirements in line with LPR; the relevant Implementing rules will entry into force by April 2012 and in the meanwhile the national regulations still apply.

Starting from 5 March 2008 all the new pilot licenses have been issued by ENAC in accordance with the LPR defined in ICAO Annex 1 Appendix 1.

Due to the requirements at the present in force in Italy for pilots holding IR and other pilots involved in international operations, ENAC has issued, on request, a statement confirming the Level 4 to those pilots whose license was issued before 5 march 2008.

That being stated, commercial pilots are in compliance with ICAO LPR requirements as of 5 March 2011, while private pilots (holding IR) involved in international operation have to be checked by actual examination by 31 December 2011.

So far no major incidents have occurred due to the interim measures taken by ENAC since the 5 march 2008.

Air Traffic Controllers and Aeronautical Station Operators

National regulation "Regolamento per la definizione dei requisiti della licenza di controllore del traffico aereo" has been issued on 16 February 2006 for air traffic controllers licensing but its implementation started on 1 April 2008. This regulation includes LPR according with ICAO Annex 1 Appendix 1. However, in order to endorse E.U. Directive 23/2006 the implementation date for LPR was postponed to 17 May 2010.

National regulation "Regolamento per la definizione dei requisiti della licenza di operatore del servizio informazioni volo (FIS)", which covers also the provision of the Aeronautical Station Operator functions, has been issued on 23 March 2011; it states that LPR according with ICAO Annex 1 Appendix 1 has to be met by 31 December 2011.

A handwritten signature is located in the bottom left corner of the page.



ENAC

LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

TABLE 1-NATIONAL REGULATORY FRAMEWORK

Focal Point Information		
Name	Eleonora Italia	
Title	Head of Personnel Licensing Department	
Organization	ENAC Italian Civil Aviation Authority	
Telephone	+39 06 44185 700 mob. +39 329 018 3454	
fax	+39 06 44185 701	
E-mail	e.italia@enac.gov.it	
Compliance		
Standards and Recommended Practices (SARPs)	Yes, the regulatory framework is in place	
Annex 1	1.2.9.1	Yes, in place: JAR FCL 1.200 and 2.200 for IR holders. Until 5 March 2008, the demonstration was given by the existing assessment methods during theoretical examinations and flight checks. From 5 march 2008 the new assessment methods based on Annex 1 Appendix 1 for evaluating plain language have been added to the existing ones.
	1.2.9.2	Yes in place: Parliament Decree 118 dated 30 May 2008 and "Regolamento per la definizione dei requisiti della licenza di controllore del traffico aereo" Art. 9 for air traffic controllers. For aeronautical station operators English competence of personnel is regulated by the "Regolamento per la definizione dei requisiti della licenza di operatore del servizio informazioni volo (FIS)"



LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

1.2.9.4 appendix 1, attachment A	<p><u>Pilots: Partially in place</u> JAR FCL-1 and FCL-2 (endorsed by ENAC Regulation "Regolazione tecnica in materia di rilascio e rinnovo di licenze di pilotaggio) requires for pilots with Radiotelephony licence to be checked for proficiency language. From 5 March 2008 new licences have been issued with a previous demonstration of language proficiency requirements compliant with ICAO Doc. 9835. For pilots holding a Private IR license with radiotelephony communication, endorsement in English, issued prior to 5 March 2008, the demonstration, up to Level 4, was given based on existing assessment methods, according to JAR FCL 1.005 (b) (5) B. They will be submitted to the new assessment method (Annex 1 Appendix 1) of demonstration within 31 December 2011.</p> <p><u>ATCO and station operators: Partially in place</u> "Regolamento per la definizione dei requisiti della licenza di controllore del traffico aereo" Appendix 3 and attached table for controllers effective since 17 May 2010. For aeronautical station operators English competence of personnel is regulated by the "Regolamento per la definizione dei requisiti della licenza di operatore del servizio informazioni volo (FIS)". Full compliance is due by 31 December 2011</p>
1.2.9.6	<p>Yes, in place: (ENAC Regulation "Regolazione tecnica in materia di rilascio e rinnovo di licenze di pilotaggio" and Regolamento per la definizione dei requisiti della licenza di controllore del traffico aereo" art. 12.5). Pilots and air traffic controllers who demonstrate proficiency below level 6 will be formally evaluated at intervals of 3 years (level 4) and 6 years (level 5). For aeronautical station operators English competence of personnel is regulated by the "Regolamento per la definizione dei requisiti della licenza di operatore del servizio informazioni volo (FIS)".</p>
1.2.9.7	<p>Yes, in place: See information provided in item 1.2.9.6</p>
5.1.1.2 XIII	<p><u>Pilots: Yes, in place</u> ENAC already endorse the LPR on pilot's licence::</p> <ul style="list-style-type: none"> - in section XIII "remarks" : language proficiency, i.e. English level 4 exp. (Appendix 1 to JAR FCL 1/2 .075) - For pilots below level 4: restricted to internal, VFR, other than transportation activity - In the transitional phase, pilots will be given a certificate to enclose to the licence <p><u>ATCO and station operators: Yes in place</u> "Regolamento per la definizione dei requisiti della licenza di controllore del traffico aereo" Appendix 1. Fully implemented since 17 May 2008.</p>



LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

Annex 6	Part I – 3.1.8	<p>Yes, in place: Already provided for by EU-OPS 1.020 (a)(2), those provisions are included in the Essential Requirements for OPS, published as an Annex to the EASA basic regulation. Operators are arranging their placement test and pre assessment test for their new pilots. For pilots already employed and holding an English radiotelephony communication endorsement issued before 5 March 2008, the operator ensures and applies to ENAC for the recognition of level 4, so that all flight crew members will be evaluated within the next 3 years with the new assessment method (Annex 1 Appendix 1).</p>
	Part III-1.1.3	<p>Yes, in place: Already provided for by EU-OPS 3.020 (a)(2), those provisions are included in the Essential Requirements for OPS, published as an Annex to the EASA basic regulation. Operators are arranging their placement test and pre assessment test for their new pilots. For pilots already employed and holding an English radiotelephony communication endorsement issued before 5 March 2008, the operator ensures and applies to ENAC for the recognition of level 4, so that all flight crew members will be evaluated within the next 3 years with the new assessment method (Annex 1 Appendix 1).</p>
Annex 10 Volume II	5.1.1.1	<p>Yes in place: Regulation (CE) 2096/2005 requests for compliance with Annex 10 Vol. II. Military Service Provider fully comply with the regulation. Remaining providers ensure compliance with the requirements based on existing procedures.</p>
	5.2.1.2.1	See information 5.1.1.1
	5.2.1.2.2	<p>Yes in place: Regulation (CE) 2096/2005 requests for compliance with Annex 10 Vol. II</p>
	5.2.1.2.3	<p>Yes in place: Regulation (CE) 2096/2005 requests for compliance with Annex 10 Vol. II</p>
Annex 11	2.29.1	<p>Yes in place: Regulation (CE) 2096/2005 requests for compliance with Annex 11. Military provider fully comply with the regulation. Remaining providers ensure the ability to speak and understand the language for radiotelephony according with existing procedures.</p>
	2.29.2	<p>Yes in place: Regulation (CE) 2096/2005 requests for compliance with Annex 11</p>



ENAC

LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

Table 2-Estimate of national level of implementation

Date: 07/02/2011				
Pilots involved in international operations	ATPL	CPL	MPL	Method of assessment of level of proficiency
	4874	2935	none	
Level 3 and below	5%	10%	NA	<ul style="list-style-type: none"> - Until the 5th of march 2011 according to the previous methods of assessment - By the 5th of march 2011 all pilots have been assessed according to test developed in compliance with ICAO and JAR FCL requirements.
Level 4	65 %	70 %	NA	
Level 5	20%	15%	NA	
Level 6	10%	5%	NA	
PPL				
Date: 07/02/2011				
Indicate numbers of PPLs involved in international operations	Total 7262 Circa 3100 about 40%	Briefly described the method of assessment of level of proficiency	Pilots holding a licence with radiotelephony communication endorsement in English issued prior to 5 March 2008 will be submitted to the new assessment method (Annex 1 Appendix 1) of demonstration within 31 December 2011.	

Date: 07/02/2011					
Air Traffic Controllers employed in operational services	Aerodrome	Approach	Area	Student	Method of assessment of level of proficiency
	237	645	580	60	
TOTAL					
Level 3 and below	0%	0%	0%	0%	Test
Level 4	85%	87%	82%	90%	Test
Level 5	15%	13%	18%	10%	Test
Level 6	0%	0%	0%	0%	Test

**LANGUAGE PROFICIENCY IMPLEMENTATION PLAN****TABLE 3—LANGUAGE PROFICIENCY TRAINING PROGRAMMES**

State oversight of aviation language training has been established yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	
Language Training will be provided through:	
Air navigation Service Provider	X
Air operator/airline	X
Educational Institutions	X
Private organizations	X

A handwritten signature in black ink, appearing to be 'S. P. ...', is located in the bottom left corner of the page.



ENAC

LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

TABLE 4—LANGUAGE PROFICIENCY ASSESSMENT FOR LICENSING PURPOSES

State oversight of aviation language assessment has been established	yes	
Formal evaluation of personnel who have demonstrated level 4 and level 5 has started	yes	
Pilots		
The Language Proficiency Assessment is developed by:		
Civil Aviation Authority	X (through the company selected with a tender)	
Air Operator		
Educational Institution		
Private Organization		
The Language Proficiency Assessment is administered by:		
Civil Aviation Authority	X (and the selected private organisation - Mayflower)	
Air Operator		
Educational Institution		
Private organization		
Controllers and Aeronautical Station Operators		
The Language Proficiency Assessment is developed by:		
Civil Aviation Authority		
Air Navigation Service Provider	X (ATCOs)	
Educational Institution		
Private Organization	X (for aeronautical station operators by a company selected with a tender)	
The Language Proficiency Assessment is administered by:		
Civil Aviation Authority		
Air Navigation Service Provider	X (ATCOs)	
Educational Institution		
Private Organization	X (for aeronautical station operators)	



ENAC

LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

TABLE 5- NUMBER OF ENDORSEMENTS GIVEN ON LICENSES AND THE RECORD OF UNLICENSED PERSONNEL

	No. of licences	No. of endorsed licences under Annex 1, paragraph 5.1.1.2, XIII for LPRs	No of endorsed licences under article 39 b of the Chicago Convention for LPRs
ATPL + CPL + MPL	7809	7419	390
PPL	7706	5225	2481
	No of licensed or unlicensed personnel as appropriate	No. of endorsed licences under Annex 1 paragraph 5.1.1.2, XIII or equivalent record for unlicensed personnel for LPRs	No of endorsed licences under article 39 b of the Chicago Convention for LPRs
Controllers	2772	2772	N.A.
Aeronautical station Operators	110	0	0



ENAC

LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

TABLE 6 - INTERIM MEASURES TO MITIGATE THE RISK

Pilots (international operations)	2008	2009	2010
Commercial multi-pilot operations	The implementation of LPR training provided by training organizations since 2007 in compliance with Annex 1 Appendix 1 and Doc. 9835 requirements. As transitional implementation, pilots holding a licence issued before 5 March 2008 will be given maximum level 4, in order to evaluate them all with the new assessment method in compliance with ICAO regulations and requirements no later than 2011	The implementation of LPR training provided by training organizations since 2007 in compliance with Annex 1 Appendix 1 and Doc. 9835 requirements. As transitional implementation, pilots holding a licence issued before 5 March 2008 will be given maximum level 4, in order to evaluate them all with the new assessment method in compliance with ICAO regulations and requirements no later than 2011	The implementation of LPR training provided by training organizations since 2007 in compliance with Annex 1 Appendix 1 and Doc. 9835 requirements. As transitional implementation, pilots holding a licence issued before 5 March 2008 will be given maximum level 4, in order to evaluate them all with the new assessment method in compliance with ICAO regulations and requirements no later than 2011
General Aviation multi-pilot operations	See above	See above	See above
Commercial single-pilot operations	See above	See above	See above
General Aviation single-pilot operations	See above	See above	See above
Controllers	Italian controllers although not assessed according with LPR regulation (Annex 1 Appendix 1) have been selected and trained for English knowledge and phraseology and are considered suitable for operations. Historical data don't show any occurrence due to lack of English knowledge	Italian controllers although not assessed according with LPR regulation (Annex 1 Appendix 1) have been selected and trained for English knowledge and phraseology and are considered suitable for operations. Historical data don't show any occurrence due to lack of English knowledge	Italian controllers although not assessed according with LPR regulation (Annex 1 Appendix 1) have been selected and trained for English knowledge and phraseology and are considered suitable for operations. Historical data don't show any occurrence due to lack of English knowledge



LANGUAGE PROFICIENCY IMPLEMENTATION PLAN

Notification of Difference From Annex 1

1. The following differences will exist on 5 March 2011 between the regulations/practices of Italy and the language provisions as detailed in Table 1 of this implementation Plan:

<i>Annex Provision</i>	<i>Difference Category</i>	<i>Details of difference</i>	<i>Remarks</i>
§1.2.9.4 "As of 5 March 2008, aeroplane, airship, helicopter and powered-lift pilots, air traffic controllers and aeronautical station operators shall demonstrate the ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1"	B (Different in character or other means of compliance)	For pilots holding a private IR flight licence with a radiotelephony communication in English, issued before 5 March 2008, ENAC, on demand, will maintain valid the endorsement at level 4 already granted based on assessment methods enforced before that date up to 31 December 2011. This is in order to complete private pilots IR evaluation with the new assessment method in compliance with ICAO regulations and requirements no later than 31 December 2011 For aeronautical station operators full implementation of LPR regulation is postponed to 31 December 2011	The assessment method, for pilots, is in compliance with Annex 1 Appendix 1 requirements starting from 5 March 2008.

2. By the date indicated below, Italy will have complied with the language provisions as detailed in Table 1, for which differences have been notified in 1 above.

<i>Annex Provision</i>	<i>Date</i>	<i>Comments</i>
§ 1.2.9.4	Private IR Pilots: 31 December 2011 Aeronautical station operators: 31 December 2011	Within the dates indicated all pilots, air traffic controllers and aeronautical station operators will be submitted to the new assessment methods in compliance with Annex 1 Appendix 1 requirements.