

Part 135 D-Cat Privileges Reviewed

Recent occurrences led the CAA to conduct a review of the D-cat instructor privileges, and as a result, some Part 135 expositions may need updating.

The D-cat was initially introduced in the mid-1960s as an airline pilot qualification to utilise a highly experienced pool of airline pilots who didn't want to become fully-fledged instructors.

To ensure it wasn't misused, privileges were restricted to instrument flight training and type ratings.

Driven by demand for non-airline type role training in other sectors, particularly for Part 135 operations, the D-cat instructor rating has become a staple in such role training as sling loads, night vision imaging systems, and multi-engine instruction.

The Issue

The CAA has determined that action needs to be taken to clarify the use of D-cat instructors within some Part 135 operations.

When the rating was conceived, the intention was that the operational privileges afforded to a D-cat by their employer should be exercised only within that same air operation.

Due to developments within aviation, however, D-cat privileges have gradually expanded within the operational training sphere, and some of the Part 135 training programme requirements have not kept pace.

Read in isolation, Part 61 restricts the D-cat instructor ratings to instrument flight training and type ratings. But if Part 61 is read in conjunction with Parts 121, 125, and 135, the rules allow D-cats to provide operational flight instruction, so long as they have sufficient role experience.

Because the skills required to give initial flight instruction are totally different to those required for operational instruction, D-cats are restricted to operational flight training only. Pilots receiving operational instruction are already qualified, and in many cases, have considerable flight experience.

The Answer

Some Part 135 operator expositions will need to be updated to ensure they comply with rule 135.553, which requires that they contain the training programmes and syllabuses. These training programmes must be accepted by the CAA.

A, B, or D-cat instructors with suitable role experience will continue to deliver the training programmes, and those approved instructors need to be named in your exposition.

Training programmes must ensure that all crew members are sufficiently trained and competent to complete required duties.

Bill MacGregor, CAA Principal Aviation Examiner, says rule 135.553 training programmes need to reflect an organisation's scope of activities and risk environment.

"For example," says Bill, "if the organisation conducts high-tension power line surveys or mountain operations, including heli-skiing and snow landings, then the programme must describe the equipment, knowledge, skills and techniques necessary to conduct that operation."

"Operational instructors delivering the training programme must hold an A, B, or D-cat instructor rating as their basic instructional qualification. They must also have demonstrated experience in the role in which they are delivering training. Instructors must also demonstrate to the organisation biennially that they remain competent to deliver the training programme."

The CAA expects these improved training programmes to be in place before completing the first of any of the following assessments:

- » application for issue or renewal of an AOC; or
- » application for addition of flight crew training privileges (M6) to the Operations Specifications; or
- » application for approval of an SMS implementation plan.

Once a training programme is established, it may be conducted internally, or contracted to a Part 141 training organisation, but it remains the responsibility of the organisation to ensure the programme is properly implemented. ■

