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To : Direction de l'Aviation Civile
Licensing department

Ms. Mirjam Huizer

Ms. Carole Fleres

COVID 19: Article 71(1) of Regulation (EU) 2018/1139 Exemption notification form, Issues to be included to cover the needs of European General Aviation

Dear Ms. Huizer and Ms. Fleres

As training or certifications sessions should become more difficult to carry out in times of the COVID19 Pandemic as we face it in Luxembourg and throughout Europe, all validity of certificates, approvals, validations may be temporarily extended for 4 months with the possibility for the NAA for further extension up to 9 months from their legal expiry. This should apply, not exhaustively, to:

- **FCL.025. Theoretical knowledge examination for the issue of licenses and ratings**
- **FCL.055 Language proficiency**
- **FCL.060 Recent Experience.** all the mentioned periods should be extended.
- **FCL.140.A LAPL Recency Requirements** and FCL.140.H LAPL(H) and SPL and BPL BFCL.160.(a)1

In Addition to the previously published Exemption notification form according to Article 71(1) of Regulation (EU) 2018/1139, covering **CPL, MPL, Flight Instructors and Examiners within** organizations, we also recommend to include these license holders **outside** of organizations:

Class ratings, type ratings and instrument ratings endorsed in Part-FCL commercial pilot licenses (CPL, MPL, ATPL) for operating aircraft representing those classes and types within and **without** an organization for which Annex III (Part-ORO) to Regulation (EU) No 965/2012 is applicable;

(i) Part-FCL instructor and examiner certificates the holders of which are involved in training and checking of holders of the class and type ratings specified in point 1(i) above.

- FCL.625 IR – Validity, revalidation and renewal
- FCL.740. Validity and renewal of class and type ratings, for Aeroplanes, Helicopters, Balloons and Airship
- FCL.815. Mountain rating
- FCL.940. FI Validity of Instructor certificate
- FCL.1025 FE Validity, revalidation and renewal of examiners certificates.
- FCL.626 IR, IR theoretical knowledge validity

MED.A.045 a) Validity, revalidation and renewal of medical certificates:

- 1 and 2: Class 1 Medicals, the extension needs to cover also license holders outside an organisation
- 3: Class 2 Medicals, the extension needs to cover also holders of non-commercial medical certificates.
- 4: LAPL Medical: the extension needs to cover also holders of a LAPL

Further areas that need to be covered:

Also **maintenance organizations** and their staff have an urgent need for an extension. But as we are not specialists in this domain, the relevant paragraphs still need to be identified.

The same problems apply for **Airworthiness Review Certificates (ARCs)**. One day after the expiration of an ARC, an aircraft must not be moved to a maintenance shop without a permission to fly, which makes the process very complicated. Routine maintenance like 100hr checks can still be enforced, but the annual ARC needs to be extended like the personal licenses.

Please contact us if further information is required.

Sincerely

Best Regards

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