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Title	Implementing Rules for Pilot Licensing - Part-FCL
NPA Number	2008-17b

British Gliding Association (office@gliding.co.uk) has placed **21** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
35	(General Comments)	0	The comments in this response to NPA17b represent the formal response of the UK British Gliding Association	
662	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.015 Application and issue of licences, ratings and certificates	5	<p>FCL.015 Application for issue of licences, ratings and certificates Comment:</p> <p>Regulation (EC) 216/2008 recognises that qualified entities may deliver specific certification tasks for the competent authority. It is proposed that the text within FCL.015 should be amended as underlined below to read;</p> <p>BGA Proposal (a) An application for the issue, revalidation or renewal of pilot licences and associated ratings and certificates shall be to the competent authority, or to the appointed qualified entity, in a manner established by this authority. The application shall be accompanied by evidence that the applicant complies with the requirements for the issue, revalidation or renewal of the licence or certificate as well as associated ratings or endorsements, established in this Part and Part Medical.</p>	
569	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.105.S LPL(S) - Privileges and	15	There are a number of inappropriate differences between LPL(S) and SPL which we believe simply to be drafting differences: highlighted on the attached file.	LPL(S) SPL Drafting Differences pdf.pdf (300.7kb) 

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	conditions			
570	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.105.S LPL(S) - Privileges and conditions	15	<p>FCL.105.S (page 15) & FCL.205.S (page 21) <u>NPA Proposal</u> (b) The holder of a LPL(S) shall only carry passengers after s/he has completed 10 hours of flight time as pilot-in-command of sailplanes, powered sailplanes or TMG. . <i>Comment</i> Neither: <i>The skill test for the issue of a LPL(S) and of an SPL (AMC No1 to FCL.125 and to FCL.235, page 204),</i> Nor <i>The specified flight instruction for the LPL(S) and SPL (AMC to FCL.110.S and FCL.210.S, page 241),</i> <i>contain any mention of any aspect of passenger flying.</i> <i>A pilot will <u>not</u> acquire the necessary skills while flying solo.</i> <i>Further, most glider solo flying takes place in single seat aircraft.</i> <i>It is thus essential that a further test or check is required before permitting passenger flying.</i> . <u>BGA Proposal</u> FCL.105.S (b) & FCL.205.S (b) (2) Should both read: shall only carry passengers after s/he has: (1) completed 10 hours of flight time as pilot-in-command of two seat sailplanes, powered sailplanes or TMG. and (2) passed a proficiency check with an instructor, demonstrating appropriate passenger handling skills</p>	
36	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 5: Specific requirements for the LPL for sailplanes - FCL.130.S LPL(S) - Launch methods	15 - 16	<p>FCL.130.S LPL(S) Launch methods <u>NPA Proposal</u> (a) (3) in the case of bungee launch, a minimum of 10 launches performed in dual instruction or solo under supervision. (c) In order to maintain their privileges in each launch method, pilots shall complete a minimum of 5 launches during the last 24 months.</p>	

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			<p><i>Comments:</i> <i>Bungee launching is a method which last for only a few seconds; there are no variations in technique or failure modes to be taught. The syllabus of training contained in this NPA has, of course, no section for teaching bungee launching. The sole UK club which practices bungee launching requires just a single launch to establish competence. The excessive number of launches proposed here add extra hazard to the volunteers who pull the rope. This activity entails a small risk of such injuries as cuts and sprains: the risk is willingly accepted by these volunteers, but the Agency would be irresponsible to increase it without any flight safety justification. The proposed number of launches to maintain the privileges are also excessive for bungee launching.</i></p> <p><u>BGA Proposal</u> <i>(3) in the case of bungee launch, 1 launch performed in dual instruction or solo under supervision.</i> <i>(c) In order to maintain a minimum of 5 launches (for bungee launching 1 launch) during the past 24 months.</i></p>	
86	B. Draft Opinion Part-FCL - Subpart I: Additional Ratings - FCL.800 Aerobatic rating	42	<p>FCL.800 Aerobatic rating (Page 42) <i>Comment:</i></p> <ol style="list-style-type: none"> <i>1. UK sporting gliding has many decades experience of safe aerobatic flying. Our pilot's do not currently require a rating. Their training is monitored by local practices and rules but does follow a national syllabus</i> <i>2. Many pilots only ever aspire to an elementary level of aerobatics which is well below that required in the AMC. We believe, therefore, that the requirement for training is set at far too high a level for sailplane pilots - and seems to be largely informed by the powered flying requirements. In addition, there are only very few training sailplanes available which are permitted to fly the range of manoeuvres proposed in 4.1</i> <i>3. We also have reservations about the requirements for hours. There is enormous variety in the way that aerobatic instruction time can be logged. On one extreme, the entire block to block time for an aerobatic sortie is claimed; in contrast, some only claim the time spent actually manoeuvring. Specifying training in terms of hours is thus quite inappropriate for sailplanes. For sailplanes, the number of instructional aerobatic flights is a more meaningful figure.</i> <i>4. In addition, sailplane aerobatics must take place at the airfield, making supervised solo a valuable option.</i> 	

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			<p>BGA Proposal</p> <p>1. FCL.800 (b) (1) to read: at least 40 hours (20 hours for sailplanes) as pilot-in-command in the appropriate aircraft category (3) to read: 5 hours of dual aerobatic instruction time (or, for sailplanes, 20 aerobatic flights which are either dual instruction or supervised solo) Add a further paragraph (4) (sailplanes only) a proficiency check with an instructor who holds the rating., 4.1.(S)</p>	
571	B. Draft Opinion Part-FCL - Subpart I: Additional Ratings - FCL.805 Sailplane towing and banner towing ratings	42	<p>FCL.805 (page 42)</p> <p><i>Comment:</i> <i>The provisions in the NPA for a sailplane towing rating are very flawed and have the potential to encourage dangerous flying.</i> <i>The purpose of an aerotow is be to deliver the sailplane pilot to the point in the sky where s/he needs to be economically and safely. A crucial component of a tug pilot's skills, therefore, is an understanding of the sailplane pilot's needs.</i> <i>1) UK gliding has always acheived these objectives without any need for a sailplane towing rating.</i> <i>2) This success has been achieved by training pilots who are skilled and experienced in both aeroplane and soaring flying. UK gliding clubs have found that powered pilots with bare knowledge of sailplane flying need a great deal of training. In contrast, glider pilots with little more than a power licence can quickly achieve the required standard. Where clubs have tried using 'pure' power pilots with minimal gliding experience the resulting tows can be ineffective and sometimes dangerous.</i> <i>.</i> <i>This experience is closely matched by military flying. No air force would dream of introducing formation leading until a pilot is a competent "No2" (in this case a competent aerotow glider pilot). Formation and aerotowing skills are almost identical. The NPA requirement of 40hrs in command of aeroplanes, yet only 3 familiarisation flights in an aerotowed sailplane is completely the wrong way round.</i> <i>3) As the NPA17 is written, the proposed 10 dual instruction flights will require, for the majority of current tug types, the services of a LAFI(A) or FI(A) and most gliding clubs do not have ready access to these pilots. Buying in their services will be expensive, in both time and money. In demanding a LAFI(A) or FI(A), the proposal excludes the very pilots with the experiance to effectively teach towing (ie pilots with sailplane skills).</i> <i>UK clubs have used soaring pilots with CRI ratings in this role with great success. The</i></p>	

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			<p><i>NPA has been wrong to exclude this. Currently, UK FIs can demand £20 or more per hour for flying club work. This towing requirement would increase the demand and thus their fees.</i></p> <p><i>In summary, this proposal requires expensive instructors, with no required understanding of the subject they are teaching, to train pilots with the wrong experience themselves, for a rating that has been proven to be unnecessary.</i></p> <p><i>The items below reflect our hard won experience. The final two maintain the option of using "pure" aeroplane pilots but stiffen up the sailplane experience to a suitable minimum level.</i></p> <p><u>BGA Proposal</u></p> <p><i>First: the banner and sailplane towing ratings should be split.</i></p> <p>.</p> <p><i>Second: Remove all references to the towing rating for sailplanes.</i></p> <p>ALTERNATIVE WORDS FOR SAILPLANE TOWING</p> <p><i>(Perhaps FCL.806)</i></p> <p><i>"Applicants for a sailplane towing rating shall have:</i></p> <p><i>(1) 100 hours flight time as pilot-in-command, to include (for initial issue of the rating) 5 hours pilot-in-command of the aircraft type involved</i></p> <p><i>(2) received appropriate theoretical knowledge instruction on towing operations and procedures</i></p> <p><i>(3) completed 10 dual instruction flights towing a sailplane. This dual flying can be flown with a LAFI(A), FI(A), or CRI who holds the rating in question.</i></p> <p><i>(4) a LAPL(S) or SPL with aerotow launching restriction removed</i></p> <p><i>Alternatively, the applicant shall have:</i></p> <p><i>(5) the experience and training specified in FCL.805 for banner towing. The 10 dual flight requirement can be flown with a LAFI(A), FI(A), or CRI who holds the rating in question.</i></p> <p><i>(6) demonstrated sailplane aerotow flying to the same standard that is required for a LAPL(S) or SPL holder to have the aerotowing restriction removed, with a minimum of 3 launches."</i></p> <p>AND</p> <p><i>1. Delete the requirement for 40 hours in type (see 1 above).</i></p> <p><i>2. There are 4 different licences to which a towing rating can be attached LAPL(A), PPL(A), LAPL(S) with TMG, & SPL with TMG. It should be specified that the appropriate towing rating on one is valid on all.</i></p>	

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			<p>3. Add to FCL.905.CRI CRI - Privileges and Conditions</p> <p>(a) and towing ratings.</p>	
663	B. Draft Opinion Part-FCL - Subpart J: Instructors - Section 2: Specific requirements for the light aircraft flight instructor	47	<p>FCL.905.LAFi, Part B, Page 47</p> <p>Comment: The proposals identify that the privileges of a light aircraft flight instructor (LAFI) are to conduct flight instruction for the issue, revalidation or renewal of a LPL but not an SPL. The logic of prohibiting a LAFI(S) from instructing for the issue of an SPL is understood, but the proposal takes this logic too far. In particular:</p> <ul style="list-style-type: none"> • The flight instruction specified for LPL(S) are SPL are identical (AMC to FCL.110.S and to FCL.210.S) • The skill tests specified for LPL(S) and SPL are identical (AMC No1 to FCL.125 and to FCL.235) • LAFI(S) and FI(S) have identical pre-requisites for their training courses (FCL.915.LAFI (d) & FCL.915.FI (f)) • LAFI(S) and FI(S) undergo identical training courses (FCL.930.LAFI (b)(1) and (b)(2)(i) & FCL,930.FI (b)(1)(ii) and (b)(2)(iii)) • LAFI(S) and FI(S) restricted privileges are identical (FCL.910.LAFI & FCL.910.FI) • LPL(S) and SPL recency requirements are identical (FCL.230.S) <p>There is, thus, no reason, identified in the proposal why a LAFI(S) should not instruct for SPL, or why an FE LPL(S) should not examine for SPL.</p> <p>During the early part of training, when a pupil has not yet gone solo and so does not require a medical certificate, she or he may not even have decided what type of licence s/he wishes to train for. Requiring an arbitrary choice between identical instructors makes no sense..</p> <p>BGA Proposal (Alternative text)</p> <p>FCL.905.LAFI (b) a LPL (1) For sailplanes only, where instructor standards and flying training requirements are identical, a LAFI(S) may instruct for the issue, revalidation or</p>	

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			<p>renewal of an SPL. FCL.1005.FE:(Page 66) (g) (1) skill tests for the issue of the LPL(S) and, for sailplanes only, where instructor standards and flying training requirements are identical, skill tests for the issue of the SPL. Should, however, EASA consider that they are legally forced to continue to pursue the current proposal, an amendment to FCL.210.S is proposed: FCL.210.S (b) Applicants for an SPL who have met all the requirements for the issue of a LPL(S) shall be fully credited towards the requirements in (a).</p>	
27	<p>B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC to FCL.115 and FCL.120 - Syllabus of theoretical knowledge for the LPL - II. Additional subjects for each category - II.C. Sailplanes</p>	193 - 194	<p>AMC TO FCL.115 and FCL.120 SYLLABUS OF THEORETICAL KNOWLEDGE FOR THE LPL II.C. SAILPLANES 6. OPERATIONAL PROCEDURES - SAILPLANE <u>NPA Proposal</u> 6.6. SPECIAL OPERATIONAL PROCEDURED AND HAZARDS) BGA Proposal 6.6. Relevant operational procedures and hazards</p>	
28	<p>B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC No 1 to FCL.125 and to FCL.235 - Contents of the skill test for the issue of a LPL(S) and of an SPL</p>	204 - 206	<p>p206 AMC No1 to FCL.125 and to FCL.235 Contents of the skill test for the issue of a LPL(S) and of an SPL SECTION 2 LAUNCH METHOD SECTION 2(A)c - delete the word 'simulate' this is not needed. SECTION 3 GENERAL AIRWORK <u>NPA Proposal</u> a Maintain straight and level flight; attitude</p> <p><i>Comment:</i> <i>Level flight is not appropriate for sailplanes</i> BGA Proposal a Maintain straight flight; attitude <u>NPA Proposal</u> <u>Section 3</u> <i>Comment:</i> <i>There is no proposed requirement to test for local area navigation. This is a critical skill.</i> BGA Proposal</p>	

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			<p><i>add:</i> <i>h Local Area Navigation and awareness: Maintain appropriate awareness and maintenance of location, particularly with respect to local airspace and traffic requirements</i></p>	
68	B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC No 1 to FCL.125 and to FCL.235 - Contents of the skill test for the issue of a LPL(S) and of an SPL	204 - 206	<p>Page 205 AMC 1 to FCL.125 and FCL.235 Contents of the skill test for the issue of a LPL(S) and of an SPL <u>NPA Proposal</u> 2. Checks should be completed in accordance with the flight manual and/or the authorised check list</p> <p><i>Comment:</i> <i>Local circumstances may require checklist items in addition to those specified by the manufacturer.</i></p> <p><u>BGA Proposal</u> 2. Pre flight servicability checks should be carried out in accordance with the flight manual or the servicing schedule. Pre flight vital actions should be carried out as appropriate, but must include the minimum described in the flight manual.</p>	
258	B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC to FCL.110.S and to FCL.210.S - Flight instruction for the leisure pilot (sailsplanes) and the sailplane pilot licence (SPL)	241 - 246	<p>AMC TO FCL.110.S AND TO FCL.210.S FLIGHT INSTRUCTION FOR THE LEISURE PILOT (SAILPLANE) AND THE SAILPLANE LICENCE (SPL) 3. SYLLABUS OF FLIGHT INSTRUCTION Exercise 10: Spin recognition and avoidance Page 243 & AMC to FCL.930.LAFI Light Aircraft Flight Instructor (LAFI) training course PART 2 C. Sailplanes Page 441 Note: Although exercise 11B is not required for the LPL course, it is a requirement for the LAFI course.</p> <p><u>NPA Proposal</u> Full spinning is not included</p> <p><i>Comment:</i> <i>UK gliding experience and safety data is that full spinning must be included in each</i></p>	

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			<p><i>syllabus. The BGA is very keen to see the requirement for full spin training to be retained for LPL(S) & SPL!</i></p> <p><u>BGA Proposal</u> Exercise 10: Spin recognition and avoidance and developed spins - safety checks - stalling and recovery at the incipient spin stage (stall with excessive wing drop, about 45deg) - Instructor induced distractions during the spin entry - entry into fully developed spins - recognition of full spins - standard spin recovery</p>	
362	B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC to FCL.110.S and to FCL.210.S - Flight instruction for the leisure pilot (sailplanes) and the sailplane pilot licence (SPL)	241 - 246	<p>Exercise Numbering Page 242 to 246</p> <p>AMC to FCL.110.S and to FCL.210.S FLIGHT INSTRUCTION FOR THE LEISURE PILOT (SAILPLANES) AND THE SAILPLANE PILOT LICENCE & Pages 440 & 441</p> <p>AMC TO FCL.930.LAFI Light Aircraft Flight Instructor (LAFI) training course PART 2 C. Sailplanes</p> <p>.</p> <p>The exercise numbers do not match</p>	
572	B. Draft Decision Part-FCL - AMC and GM - Subpart B: Leisure pilot licence LPL - AMC to FCL.110.S and to FCL.210.S - Flight instruction for the leisure pilot (sailplanes) and the sailplane pilot licence (SPL)	241 - 246	<p>AMC to FCL.110.S and to FCL.210.S SYLLABUS OF FLIGHT INSTRUCTION NPA Proposal Exercise 12A: Thermalling</p> <p>.</p> <p><i>Comment:</i> <i>In common with other maritime nations, the UK has several coastal gliding clubs where thermal flying is available only intermittently. As a result it may be difficult for some clubs to teach this as a practical exercise. Where this is the case we would wish to allow those clubs to satisfy the training requirement through practical & theoretical briefings.</i></p> <p>.</p> <p><u>BGA Proposal</u> Exercise 12A Thermalling (if applicable during training and if possible at training site)</p>	

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			<p>Note: If weather conditions during training do not allow the practical training of soaring techniques, all items of the air exercise have to be discussed and explained during a long briefing exercise only.</p>	
784	B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.800 - Aerobatic Rating – Theoretical knowledge and flying training	385 - 386	<p>AMC to FCL 800 (Page 385)</p> <p><i>Comment: The exercises in this part of the AMC are drawn from a power flying background and are, in many cases, not appropriate for sailplanes. We suggest an improved text which is more applicable for sailplane pilots wanting to learn basic aerobatics safely.</i></p> <p>Title sentence to read: Aerobatic Rating - Theoretical knowledge, flying training, and sailplane proficiency check</p> <p>Additional paragraph: 3(S) Sailplanes only. Contents of the proficiency check for the issue of an aerobatic rating. The applicant should demonstrate the ability to fly, safely, the manoeuvres specified in 4.1(S) in a linked sequence: FLYING TRAINING Add two paragraphs: 4.(S) The exercises of the aerobatic flying training syllabus specified in 4.1(S) must be taught, and practiced until the student is safe and competent, in a sailplane which permits these maneuvers. The holder of an aerobatic rating may not perform any other manoeuvre unless s/he has satisfied a flight instructor that s/he is competent to do so. 4.1(S)</p> <ul style="list-style-type: none"> - 45deg climbing and diving lines - Chandelle - Loop - 2g turn <p>Note: we are content with the Theoretical Knowledge and Confidence manoeuvre requirements.</p>	
29	B. Draft Decision Part-FCL - AMC and GM - Subpart I: Additional Ratings - AMC to FCL.850 -	386 - 388	<p>Page 386 AMC to FCL 805 Towing <u>NPA Proposal</u> 3.1 - - "Specific sailplane towing safety procedures"</p>	

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	Towing Rating – Theoretical knowledge and flying training		<p><i>Comment:</i> <i>This might result in tow pilots being qualified to tow certain sailplane types only. This is completely unnecessary and in any case would be unmanageable. Remove the word specific.</i></p> <p><u>BGA Proposal</u> Revised wording: - - Sailplane towing safety procedures</p>	
30	B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes	440 - 458	<p>Page 442 EXERCISE 2 - PROCEDURE IN THE EVENT OF EMERGENCIES BRIEFING <u>NPA Proposal</u> - explain the procedure for landing with a parachute...etc</p> <p><i>Comment:</i> <i>This would require access to a qualified parachute instructor.</i></p> <p><u>BGA Proposal</u> - explain how to obtain guidance for landing with a parachute...etc</p>	
31	B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes	440 - 458	<p>Page 444 <u>NPA Proposal</u> Exercise 6 - BANKING AT MODERATE ANGLE - COORDINATION</p> <p><i>Comment:</i> <i>Exercise name is misleading.</i></p> <p><u>BGA Proposal</u> Exercise title should be: Exercise 6 - CO-ORDINATED ROLLING TO AND FROM MODERATE ANGLES OF BANK Throughout References to straight and level flight should be replaced with straight flight <u>BGA Proposal</u> AIR EXERCISE</p> <p>... - rolling to a moderate angle of bank (20 to 30o) and returning to straight flight</p>	

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33	B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes	440 - 458	<p>AMC to FCL.930.LAFI Light Aircraft Flight Instructor (LAFI) training course</p> <p>C. Sailplanes</p> <p>.</p> <p><i>Comments:</i></p> <p>1. There is a mis-match between the list, on page 440/1: LONG BRIEFINGS AND AIR EXERCISES and the note on page 452: EXERCISE 13 - SOARING TECHNIQUES: <i>"NOTE: If the weather conditions during the instructor training do not allow the practical training of soaring techniques, all items of the air exercises have to be discussed and explained during a long briefing exercise only."</i></p> <p>2. In common with other maritime nations, the UK has several coastal gliding clubs where thermal flying is available only intermittently.</p> <p>.</p> <p><u>BGA Proposal</u> The list on page 440/1 should read: 13 Soaring Techniques (if applicable during training and if possible at training site) 13A Thermalling 13B Ridge flying 13C Wave flying</p>	
34	B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes	440 - 458	<p>page 456</p> <p>EXERCISE 18 - CROSS COUNTRY FLYING</p> <p><u>NPA Proposal</u></p> <p>NOTE: If the weather conditions during the instructor training do not allow a cross country training flight the items of the air exercise have to be discussed and explained during a long briefing exercise only.</p> <p>.</p> <p><i>Comment:</i></p> <p>Safety data indicate that there is a need for instructors who teach and test for competency in outlandings to demonstrate a practical ability to do so.</p> <p>.</p> <p><u>BGA Proposal</u> Add a second sentence to the note: Instructors may not teach or test the safe outlanding exercise until they have demonstrated a practical ability to do so.</p>	

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69	B. Draft Decision Part-FCL - AMC and GM - Subpart J: Instructors - AMC to FCL.930.LAFI Light - Aircraft Flight Instructor (LAFI) training course - Flight Instruction Syllabus Contents - C. Sailplanes	440 - 458	<p>AMC TO FCL.110.S AND TO FCL.210.S FLIGHT INSTRUCTION FOR THE LEISURE PILOT (SAILPLANE) AND THE SAILPLANE LICENCE (SPL)</p> <p>3. SYLLABUS OF FLIGHT INSTRUCTION Exercise 10: Spin recognition and avoidance Page 243</p> <p>&</p> <p>AMC to FCL.930.LAFI Light Aircraft Flight Instructor (LAFI) training course PART 2 C. Sailplanes</p> <p>Page 441</p> <p>Note: Although exercise 11B is not required for the LPL course, it is a requirement for the LAFI course.</p> <p><i>Comment:</i> <i>UK gliding experience is that full spinning must be included in each syllabus.</i></p> <p>Proposal:</p> <p>On page 243: Exercise 10: Spin recognition and avoidance and developed spins</p> <ul style="list-style-type: none"> - safety checks - stalling and recovery at the incipient spin stage (stall with excessive wing drop, about 45deg) - Instructor induced distractions during the spin entry - entry into fully developed spins - recognition of full spins - standard spin recovery <p>On page 441 Delete the note</p>	