



**REPUBLIC OF SAN MARINO
CIVIL AVIATION AUTHORITY**

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POLICY LETTER 01/2023 Issue 01

LINE CHECK CAPTAINS

1. Applicable references

CAR DEF – Commander

OPS 1/3.940 – Composition of flight crew

OPS 1/3.965 – Recurrent training

2. Introduction

- a) There appears to be a variable interpretation of the regulation relating to the nomination of line check captains for commercial air transport operators.
- b) To ensure standardisation, this policy letter has been published to assist operators in the interpretation of the OPS 1/3.965.

3. Applicability

This policy letter applies to all commercial air transport operators.

4. Line Check Captains

- c) OPS 1/3.965 states "*Line checks* – by **suitably qualified** commanders nominated by the operator and **acceptable** to the Authority;"
- d) What has not been defined is what is considered 'suitably qualified' and what is considered to be 'acceptable to the authority'.
- e) CAR DEF defines Commander as "Commander means the pilot designated as being **in command** and charged with the safe conduct of the flight." Therefore the 'commander' nominated by the operator shall be able to act as **PIC** on the aircraft type.
- f) OPS 1/3.940 states "all flight crew members hold an applicable and valid licence acceptable to the Authority and are suitably qualified and competent to conduct the duties assigned to them;"
- g) OPS 1/3.965(c) states "*Line Check*. the operator shall ensure that each flight crew member undergoes a line check on the aircraft to demonstrate his/her competence in carrying out normal line operations described in the Operations Manual."
- h) AMC OPS 1.965 3 & AMC OPS 3.965 2 states "The line check is considered a particularly important factor in the development, maintenance and refinement of high operating standards, and can provide the operator with a valuable indication of the usefulness of his training policy and methods. Line checks are a test of a flight crew member's ability to



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perform a complete line operation satisfactorily, including pre-flight and post flight procedures and use of the equipment provided, and an opportunity for an overall assessment of his ability to perform the duties required as specified in the Operations Manual. The route chosen should be such as to give adequate representation of the scope of a pilot's normal operations. When weather conditions preclude a manual landing, an automatic landing is acceptable. The line check is not intended to determine competence on any particular route. The commander, or any pilot who may be required to relieve the commander, should also demonstrate his ability to 'manage' the operation and take appropriate command decisions."

- i) When engaging the services of freelance or part time pilots the requirements of Subpart N must be complied with. Operators shall ensure that prior to using any freelance or part-time pilots they are competent to perform the tasks being assigned to them.
- j) The line check also includes an assessment of whether the aircraft is being operated in accordance with the applicable technical specifications and limitations, service bulletins, OEBs and special approvals including HUD/EVS for credit, steep approach, CAT II/III, as applicable. For this, the line check captain needs detailed technical and operational knowledge of the respective aircraft type.

5. Suitably Qualified as a Line Check Captain

- a) When deciding if a commander is suitably qualified then the first position is that they must be able to act a PIC on the aircraft type, therefore be type rated on the aircraft.
- b) To nominate a commander to be a line check captain the operator must provide and describe in their OM-D what training will be provided to the nominee to enable them to make assessments of performance of a crew undertaking a line check. The regulations require such a nominee to be able to assess the crew in their CRM performance, pilot monitoring and pilot flying roles, technical performance, company requirements, operate the aircraft within the AFM limitations and adhere to the company SOPs as published in the OM-B. Therefore, some training will need to be provide to the nominee to equip them to be able to perform such duties.
- c) Some operators choose nominated line training captains to attend the 'core course' element of the TRI Instructor course to equip them with the basic assessment requirement skills, although this could be achieved by other means.

6. Acceptable to the Authority

The authority will accept a type rated pilot, trained in CRM assessment and provided training to undertake line training/checking duties. The operations manual should define pre-requisites for the nomination, the training syllabus required to be completed and recurrent training to maintain their qualification and how they demonstrate their continued competence.



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7. Non-Type Rated Pilots conducting Line Checks

- a) In the event that an operator is unable to source a **suitably qualified** commander, then on each and every occasion an operator will have to submit an exemption request with a detailed risk assessment.
- b) The risk assessment will be expected to contain:
 - i) Why a suitably qualified commander cannot be sourced;
 - ii) What is being done to prevent the need to reapply for another exemption.
Note: not wishing to comply with the intent of the regulation would not be considered an acceptable reason for non-compliance.
 - iii) Identify the differences between the nominated commander's aircraft type and the aircraft type they are intending to conduct the line check on; and
Note: The operator should use the OSD ODR tables format to present this information to make the authorities task of review easier to accomplish (see AMC OPS 1.980(b)).
 - iv) What training will be provided to enable the nominated commander to demonstrate an equivalent level of safety.

8. Application Process

The operator shall submit Form SM 140 including the risk assessment in advance for the authority to review and verify the submission prior to deciding if an exemption can be issued.
Note: CAP 31 provides the guidance on the application process for exemptions.

9. Operator's Action

Please would operators check your line check captain requirements published in your operations manuals and if they do not conform with this policy, request amendments to be made.

If you have any questions on the application of this policy letter, please direct them to info@smar.aero.

Thank you for your cooperation and implementation of this policy.

Yours sincerely,

Eng. Marco Conti
Director General

21st November 2023