



ประกาศสำนักงานการบินพลเรือนแห่งประเทศไทย  
เรื่อง วิธีการที่ยอมรับได้ว่าเป็นไปตามกฎหมายและคำแนะนำวิธีปฏิบัติ

(Acceptable Mean of Compliance and Guidance Material: AMC/GM) ของข้อกำหนดของสำนักงาน  
การบินพลเรือนแห่งประเทศไทย ฉบับที่ ๗๙ ว่าด้วยการรับรองสถาบันฝึกอบรมด้านการบินสำหรับอากาศยานเบา  
(Thailand Civil Aviation Regulation – Personnel Licensing Part Declared Training Organisation  
(TCAR PEL Part - DTO))

พ.ศ. ๒๕๖๘

โดยที่การปฏิบัติให้เกิดประสิทธิผลต่อมาตรฐานความปลอดภัยตามที่กำหนดภายใต้กฎหมาย  
ว่าด้วยการเดินอากาศอาจดำเนินการได้หลายแนวทาง สำนักงานการบินพลเรือนแห่งประเทศไทยจึงได้นำ  
หลักการ “วิธีการที่ยอมรับได้ว่าเป็นไปตามกฎหมายและคำแนะนำวิธีปฏิบัติ (Acceptable Mean of  
Compliance and Guidance Material: AMC/GM)” มาใช้ในการกำกับดูแลการบินพลเรือนของประเทศไทย  
เพื่อสนับสนุนให้ผู้ประกอบการการบินพลเรือนและผู้เกี่ยวข้องสามารถมั่นใจว่าการปฏิบัติตามแนวทางดังกล่าว  
ถือว่าถูกต้องและเป็นไปตามที่กฎหมายกำหนด ดังนั้น เพื่อให้ผู้ขอรับหรือผู้ถือใบรับรองสถาบันฝึกอบรมด้านการบิน  
สำหรับนักบินอากาศยานเบา รวมถึงผู้เกี่ยวข้อง มีความเข้าใจตรงกันและสามารถปฏิบัติตามข้อกำหนดของ  
สำนักงานการบินพลเรือนแห่งประเทศไทย ฉบับที่ ๗๙ ว่าด้วยการรับรองสถาบันฝึกอบรมด้านการบินสำหรับ  
อากาศยานเบา (Thailand Civil Aviation Regulation – Personnel Licensing Part Declared Training  
Organisation (TCAR PEL Part – DTO)) ได้อย่างมีประสิทธิภาพ ผู้อำนวยการสำนักงานการบินพลเรือน  
แห่งประเทศไทยจึงออกประกาศกำหนด “วิธีการที่ยอมรับได้ว่าเป็นไปตามกฎหมายและคำแนะนำวิธีปฏิบัติ” ไว้  
ดังต่อไปนี้

ข้อ ๑ ประกาศนี้เรียกว่า “ประกาศสำนักงานการบินพลเรือนแห่งประเทศไทย เรื่อง วิธีการ  
ที่ยอมรับได้ว่าเป็นไปตามกฎหมายและคำแนะนำวิธีปฏิบัติ (Acceptable Mean of Compliance and  
Guidance Material: AMC/GM) ของข้อกำหนดของสำนักงานการบินพลเรือนแห่งประเทศไทย ฉบับที่ ๗๙  
ว่าด้วยการรับรองสถาบันฝึกอบรมด้านการบินสำหรับอากาศยานเบา (Thailand Civil Aviation Regulation –  
Personnel Licensing Part Declared Training Organisation (TCAR PEL Part – DTO)) พ.ศ. ๒๕๖๘”

ข้อ ๒ วิธีการที่ยอมรับได้ว่าเป็นไปตามกฎหมายและคำแนะนำวิธีปฏิบัติของข้อกำหนดของ  
สำนักงานการบินพลเรือนแห่งประเทศไทย ฉบับที่ ๗๙ ว่าด้วยการรับรองสถาบันฝึกอบรมด้านการบินสำหรับ  
อากาศยานเบา (Thailand Civil Aviation Regulation – Personnel Licensing Part Declared Training  
Organisation (TCAR PEL Part – DTO)) ให้เป็นไปตาม Acceptable Means of Compliance and Guidance  
Material to TCAR PEL Part – DTO (AMC/GM to TCAR PEL Part – DTO) Issue 01 Revision 00  
Date 13 January 2025 แนบท้ายประกาศนี้ และที่แก้ไขเพิ่มเติม

ข้อ ๓ ในกรณีที่ผู้ขอรับหรือผู้ถือใบรับรองสถาบันฝึกอบรมด้านการบินสำหรับนักบินอากาศยานเบา ประสงค์จะดำเนินการตามวิธีการปฏิบัติอื่นแทนวิธีการที่ยอมรับได้ว่าเป็นไปตามกฎหมายและคำแนะนำวิธีปฏิบัติ (AMC/GM) ที่แนบท้ายประกาศนี้ ให้ดำเนินการขอยกเว้นตามมาตรา ๑๕/๑๔ วรรคสอง (๒) แห่งพระราชบัญญัติการเดินอากาศ พ.ศ. ๒๕๔๗ และที่แก้ไขเพิ่มเติม โดยแสดงผลให้ปรากฏว่าการดำเนินการของตนเป็นไปตามหรือมีประสิทธิภาพมากกว่า ให้ยื่นคำขอพร้อมเอกสารและหลักฐานต่อพนักงานเจ้าหน้าที่ ดังต่อไปนี้

(๑) รายละเอียดของวิธีการปฏิบัติอื่น (Alternative Means of Compliance (AMOC)) พร้อมทั้งเอกสารหลักฐานที่แสดงได้ว่าวิธีการปฏิบัติอื่นมีประสิทธิภาพต่อระดับความปลอดภัยเทียบเท่าหรือสูงกว่า ทั้งนี้ ให้ระบุรายละเอียดของวิธีการปฏิบัติอื่นไว้ในแบบแผนการฝึกอบรม (Training Programme) หรือคู่มือการดำเนินการของสถาบันที่เกี่ยวข้องกับการฝึกอบรม

(๒) รายงานผลการประเมินความเสี่ยง (Risk Assessment) ของการดำเนินการตามวิธีการปฏิบัติอื่น นั้น

ข้อ ๔ เมื่อได้รับคำขอพร้อมเอกสารและหลักฐานตามข้อ ๓ แล้ว ให้ผู้อำนวยการสำนักงานการบินพลเรือนแห่งประเทศไทยตรวจสอบความถูกต้องและความครบถ้วนของคำขอและเอกสารหลักฐานดังกล่าว หากเห็นว่าคำขอและเอกสารหลักฐานถูกต้องครบถ้วน รวมถึงวิธีการปฏิบัติอื่นตามคำขอมมีประสิทธิภาพต่อระดับความปลอดภัยเทียบเท่าหรือสูงกว่าวิธีการที่ยอมรับได้ว่าเป็นไปตามกฎหมาย ให้ผู้อำนวยการสำนักงานการบินพลเรือนแห่งประเทศไทยรับรองให้ดำเนินการตามวิธีการปฏิบัติอื่นได้

หลังจากผู้อำนวยการสำนักงานการบินพลเรือนแห่งประเทศไทยดำเนินการรับรองวิธีการปฏิบัติอื่นตามวรรคหนึ่ง ให้ประกาศให้ผู้ได้รับใบรับรองสถาบันฝึกอบรมด้านการบินสำหรับนักบินอากาศยานเบารายอื่น รวมถึงผู้ที่เกี่ยวข้องทราบในระบบเครือข่ายสารสนเทศของสำนักงานการบินพลเรือนแห่งประเทศไทย

ประกาศ ณ วันที่ ๑๓ มกราคม พ.ศ. ๒๕๖๘



(นายสุทธิพงษ์ คงพูล)

ผู้อำนวยการสำนักงานการบินพลเรือนแห่งประเทศไทย



Thailand Civil Aviation Regulation - Personnel  
Licensing  
Acceptable Means of Compliance and  
Guidance Material to TCAR PEL Part - DTO  
(AMC/GM to TCAR PEL Part - DTO)

TCAR PEL AMC/GM Part - DTO

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Approved By

Suttipong Kongpool

Director General

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## RECORD OF REVISIONS

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## LIST OF EFFECTIVE PAGES

Change and amendment bar is placed against each paragraph affected.

| Page No. | Revision No. | Date        |
|----------|--------------|-------------|
| 1        | 00           | 13 Jan 2025 |
| 2        | 00           | 13 Jan 2025 |
| 3        | 00           | 13 Jan 2025 |
| 4        | 00           | 13 Jan 2025 |
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| 7        | 00           | 13 Jan 2025 |
| 8        | 00           | 13 Jan 2025 |
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| 10       | 00           | 13 Jan 2025 |
| 11       | 00           | 13 Jan 2025 |
| 12       | 00           | 13 Jan 2025 |
| 13       | 00           | 13 Jan 2025 |
| 14       | 00           | 13 Jan 2025 |
| 15       | 00           | 13 Jan 2025 |
| 16       | 00           | 13 Jan 2025 |
| 17       | 00           | 13 Jan 2025 |

| Page No. | Revision No. | Date |
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|          |              |      |
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## TABLE OF CONTENTS

|   |    |
|---|----|
| RECORD OF REVISIONS .....   | 3  |
| LIST OF EFFECTIVE PAGES .....   | 5  |
| TABLE OF CONTENTS .....   | 7  |
| INTRODUCTION AND APPLICABILITY .....  | 9  |
| GM1 DTO.GEN.115(a) Declaration .....  | 11 |
| AMC1 DTO.GEN.115(a)(2) Declaration .....                                    | 11 |
| AMC1 DTO.GEN.115(a)(5) Declaration .....                                    | 11 |
| AMC1 DTO.GEN.115(c) Declaration .....                                       | 11 |
| AMC1 DTO.GEN.150(b) Findings .....  | 11 |
| GM1 DTO.GEN.150 Findings .....  | 11 |
| AMC1 DTO.GEN.160 Occurrence reporting .....                                 | 11 |
| AMC1 DTO.GEN.210(a)(1)(ii) Personnel requirements .....                     | 12 |
| AMC1 DTO.GEN.210(a)(2) Personnel requirements .....                         | 12 |
| GM1 DTO.GEN.210(a)(2) Personnel requirements .....                          | 12 |
| GM1 DTO.GEN.210(c) Personnel requirements .....                             | 12 |
| AMC1 DTO.GEN.210(d);(e) Personnel requirements .....                        | 13 |
| GM1 DTO.GEN.210(d);(e) Personnel requirements .....                         | 13 |
| AMC1 DTO.GEN.215 Facility requirements .....                                | 13 |
| AMC1 DTO.GEN.220 Record-keeping .....                                       | 14 |
| AMC1 DTO.GEN.230 DTO training programme .....                               | 14 |
| AMC1 DTO.GEN.240 Training aircraft and FSTDs .....                          | 14 |
| GM1 DTO.GEN.240 Training aircraft and FSTDs .....                           | 15 |
| AMC1 DTO.GEN.250 Aerodromes and operating sites .....                       | 15 |
| AMC1 DTO.GEN.250(b) Aerodromes and operating sites .....                    | 15 |
| AMC1 DTO.GEN.270(a) Annual internal review and annual activity report ..... | 16 |
| AMC1 DTO.GEN.270(b) Annual internal review and annual activity report ..... | 16 |
| AMC1 DTO.GEN.270(c) Annual internal review and annual activity report ..... | 16 |
| GM1 DTO.GEN.270(c) Annual internal review and annual activity report .....  | 17 |

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## INTRODUCTION AND APPLICABILITY

In this publication the word 'should' is used to indicate that the Organisation, Owner or Operator has a degree of latitude in adhering to the requirement, particularly where the nature of the operation - or proposed operation - affects their ability to achieve the necessary degree of compliance with the requirement; provided that an acceptable level of safety is achieved.

If the Organisation's/owner's/operator's response is deemed to be inadequate by the Director General, a specific requirement or restriction may be applied as a condition of the appropriate instrument to be issued under Thailand Civil Aviation Regulations. This publication includes associated means of compliance and interpretative material wherever possible and, unless specifically stated otherwise, clarification will be based on this material or other relevant CAAT documentation.

These Acceptable Means of Compliance (AMCs) and Guidance Material (GM) to TCAR PEL Part FCL are derived from the AMCs and GM corresponding to European Union Aircrew Regulation (EU) 1178/2011 up to and including EASA Executive Director decision "ED Decision 2022/014/R".

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## **GM1 DTO.GEN.115(a) Declaration**

### **SUBMISSION OF THE DECLARATION**

The DTO should submit the declaration (Appendix 1 to Part-DTO), and any attachment(s) thereto, in a manner established by CAAT.

## **AMC1 DTO.GEN.115(a)(2) Declaration**

### **LIST OF AERODROMES AND OPERATING SITES OF THE DTO**

Except for DTOs that provide training for balloons, the list of aerodromes and operating sites on the declaration should contain at least those aerodromes and operating sites where the DTO, either permanently or temporarily (e.g. for training camps), conducts its training activities, where its training aircraft are based and where it has its facilities, as required by Part-DTO.

Aerodromes and operating sites that solely serve as destinations for cross-country training flights do not need to be listed on the declaration.

## **AMC1 DTO.GEN.115(a)(5) Declaration**

### **LIST OF AIRCRAFT AND FLIGHT SIMULATION TRAINING DEVICES (FSTDs)**

The list on the declaration of aircraft used by the DTO should contain at least the models used for training (e.g. Cessna 152, Piper PA 28, Robinson R22, etc.) and each individual aircraft with its registration mark.

The list on the declaration of FSTDs used by the DTO should contain the references to the FSTD qualification certificates.

## **AMC1 DTO.GEN.115(c) Declaration**

### **SUBMISSION OF TRAINING PROGRAMMES WITH THE DECLARATION**

A DTO may include in the declaration only a reference to a training programme if this training programme:

- (a) has already been verified for Part-FCL compliance by the CAAT ; or
- (b) has been published by the CAAT as a standard training programme, if applicable.

## **AMC1 DTO.GEN.150(b) Findings**

### **GENERAL**

The corrective action plan defined by the organisation should address the effects of the non-conformity, as well as its root-cause.

Consequently and depending on the issues, the corrective action plan should address the correction/containment of the issue, corrective action and preventive action.

## **GM1 DTO.GEN.150 Findings**

### **GENERAL**

- (a) Corrective action is the action to eliminate or mitigate the root cause(s) and prevent recurrence of an existing detected non-compliance or other undesirable condition or situation.
- (b) Proper determination of the root cause is crucial for defining effective corrective actions.

## **AMC1 DTO.GEN.160 Occurrence reporting**

### **GENERAL**



- (c) The organisation should report all occurrences as required by the CAAT Occurrence Reporting Regulation.
- (d) In addition to the reports required by the CAAT Occurrence Reporting Regulation, the organisation should report volcanic ash clouds encountered during flight.

### **AMC1 DTO.GEN.210(a)(1)(ii) Personnel requirements**

#### SAFETY POLICY

- (a) The safety policy should define, in relation to the DTO training programme, at least the means and methods used for:
  - (1) hazard identification;
  - (2) risk assessment; and
  - (3) effectiveness of the mitigation measures (implementation and follow-up).
- (b) The safety policy should additionally include the procedures required for occurrence reporting.

### **AMC1 DTO.GEN.210(a)(2) Personnel requirements**

#### QUALIFICATION AND EXPERIENCE OF THE HEAD OF TRAINING (HT)

- (a) The HT should, with regard to the size and the training scope of the DTO, possess sufficient managerial capabilities in order to discharge their responsibilities, and should:
  - (1) in the case of a DTO that provides training in aircraft or FSTDs, hold an unrestricted instructor certificate in accordance with TCAR PEL Part-FCL with instructional privileges that are relevant to the training provided by the DTO, including sufficient experience as necessary;
  - (2) in the case of a DTO that provides theoretical knowledge training only, have appropriate experience in aviation and knowledge relevant to the training provided.
- (b) At a DTO that provides training courses for different aircraft categories, the HT should be assisted by one or more nominated deputy HTs qualified in accordance with paragraph (a) and with regard to the other category or categories of aircraft.

### **GM1 DTO.GEN.210(a)(2) Personnel requirements**

#### SUFFICIENT EXPERIENCE OF THE HEAD OF TRAINING (HT)

'Sufficient experience', as per AMC1 DTO.GEN.210(a)(2) paragraph (a)(1), means that the HT should have gained the required experience as an instructor in order to have the capacity to administer the particular training activity of the DTO in question. The following factors should be taken into consideration for determining the experience required:

- (a) training scope of the DTO;
- (b) location of the DTO training area (e.g. mountains, sea, congested airspace);
- (c) size of the DTO (volume of activity, number of training aerodromes and operating sites);
- (d) use of FSTDs;
- (e) training aircraft models used by the DTO.

### **GM1 DTO.GEN.210(c) Personnel requirements**

## CIRCUMSTANCES UNDER WHICH A PERSON CANNOT BE TRUSTED TO CARRY OUT THE TASKS OF A REPRESENTATIVE OR A HEAD OF TRAINING (HT) IN A MANNER WHICH SAFEGUARDS AND FURTHERS AVIATION SAFETY

Examples of objective indications that a person cannot be trusted to carry out the tasks of a representative or an HT in a manner which safeguards and furthers aviation safety.

If that person, within the last 5 years preceding their nomination as representative or HT, in a declaration in accordance with Part-DTO:

- (a) holds or has held a pilot licence and that licence and/or any associated ratings, certificates or authorisations have been subject to limitation, suspension or revocation;
- (b) has knowingly and deliberately been responsible for committing any non-compliance with Licensing or operational Regulations.

### **AMC1 DTO.GEN.210(d);(e) Personnel requirements**

#### DTO INSTRUCTORS

In order to ensure and monitor that instructors maintain their required qualification, DTOs should permanently keep a list of all instructors, including information on their instructional privileges as well as on the validity periods of their licences, ratings and certificates, including their medical certificates.

### **GM1 DTO.GEN.210(d);(e) Personnel requirements**

#### RESOURCES (INSTRUCTORS)

- (c) The ratio of all students to flight instructors should allow maintaining the quality and safety of the training provided.
- (d) Class numbers in ground subjects involving a high degree of supervision or practical work should not exceed 28 students.

### **AMC1 DTO.GEN.215 Facility requirements**

(a) The facilities of a DTO should comprise:

(1) flight planning facilities providing access to at least:

- (i) appropriate and current aviation maps and charts;
- (ii) current aeronautical information service (AIS) information;
- (iii) current meteorological information;
- (iv) communications to air traffic control (ATC) (if applicable);
- (v) any other flight-safety-related material;

(2) adequate briefing facilities of sufficient size and number;

(3) suitable office(s) to allow flight instructors to write reports on students, complete records and other related documentation, as appropriate;

(4) suitable rest areas for instructors and students, where appropriate to the training task;

(5) in the case of DTOs that provide training for LAPL(B) only, the flight operations accommodation listed in (a)(1) to (a)(4) may be replaced by other suitable facilities when operating outside aerodromes.

(b) The following facilities for theoretical knowledge instruction should be available:

- (1) adequate classroom accommodation for the current student population;
- (2) suitable demonstration equipment to support the theoretical knowledge instruction;
- (3) suitable office(s) for the instructional personnel.

### **AMC1 DTO.GEN.220 Record-keeping**

Training records should be kept in a paper or electronic version by the DTO where the candidate is undertaking their training.

### **AMC1 DTO.GEN.230 DTO training programme**

- (a) The DTO training programme should include at least the following information:
  - (1) the aim of the course;
  - (2) crediting of previous experience and pre-entry requirements (including appropriate procedures for students that wish to complete their training after having started at a different training organisation);
  - (3) a list of all air and FSTD exercises to be taught, including a description of the objective of each exercise;
  - (4) a syllabus summary;
  - (5) structure and content of the theoretical knowledge instruction;
  - (6) structure of the entire course and integration of theoretical knowledge instruction, FSTD and flight training;
  - (7) student progress checks for theoretical knowledge and flight training, as appropriate.
- (b) When developing the training programme for a type rating course, in addition to complying with the mandatory training elements included in the operational suitability data (OSD), or any equivalent material established in accordance with Type certification regulations acceptable to CAAT, the DTO should also follow any further recommendations (i.e. acceptable means of compliance (AMC)) contained therein.

### **AMC1 DTO.GEN.240 Training aircraft and FSTDs**

- (a) The number of training aircraft may be affected by:
  - (1) the availability of FSTDs; and
  - (2) the number of aerodromes and operating sites of the DTO (cf. AMC1 DTO.GEN.115(a)(2)).
- (b) Each training aircraft should be:
  - (1) equipped as required in the training specifications concerning the exercise for which it is used;
  - (2) except in the case of balloons or single-seat aircraft, fitted with primary flight controls that are instantly accessible by both the student and the instructor (for example, dual flight controls or a centre control stick); swing-over flight controls should not be used.
- (c) The fleet should include, as appropriate to the training courses:
  - (1) in the case of aeroplanes and gliders, aircraft suitable for demonstrating stalling and spin avoidance;
  - (2) in the case of helicopters, helicopters suitable for autorotation demonstration;



- (3) FSTDs; each FSTD should be equipped as required in the training specifications concerning the course for which it is used.
- (d) One single aircraft that has all the required characteristics of a training aircraft mentioned in (b) and (c) above may be sufficient.

### **GM1 DTO.GEN.240 Training aircraft and FSTDs**

The DTO is required to use an adequate fleet of training aircraft. However, a DTO is not required to own the aircraft used. In any case, the DTO has the responsibility to use airworthy and appropriately equipped, certified and insured aircraft and FSTDs, as relevant to the particular training exercise.

### **AMC1 DTO.GEN.250 Aerodromes and operating sites**

#### **GENERAL**

- (a) Except in the case of balloons, the base aerodrome or operating site and any other aerodromes or operating sites at which flight training is being conducted should have at least the following facilities:
  - (1) at least one runway or final approach and take-off area (FATO) that allows training aircraft to make a normal take-off or landing within the performance limits of all the aircraft used for the training flights at that aerodrome or operating site;
  - (2) a wind direction indicator that is visible at ground level from the ends of each runway or at the appropriate holding points;
  - (3) adequate runway electrical lighting, if used for night training;
  - (4) an air traffic service (ATS), except for uncontrolled aerodromes or operating sites where the training requirements may be satisfied safely by another acceptable means of communication.
- (b) In addition to (a), for helicopters, training sites should be available for:
  - (1) confined area operation training;
  - (2) simulated engine-off autorotation; and
  - (3) sloping ground operation.
- (c) In the case of balloons, the take-off sites used by the DTO should allow a normal take-off and clearing of all obstacles in the take-off flight path by at least 50 ft.
- (d) By way of derogation from paragraphs (a) to (c) above, for training that needs to take place in a specific environment (training on seaplanes), the training sites used should have the characteristics and facilities that are necessary to ensure a safe conduct of the training.

### **AMC1 DTO.GEN.250(b) Aerodromes and operating sites**

#### **SUFFICIENT RESOURCES OF A DTO THAT PROVIDES TRAINING FOR AEROPLANES OR HELICOPTERS AT MORE THAN ONE AERODROME OR OPERATING SITE**

- (a) Deputy heads of training should meet the same qualification requirements as set out in AMC1 DTO.GEN.210(a)(2) for the head of training (HT).
- (b) The DTO should have the necessary number of instructors (point DTO.GEN.210(d) and (e)) as well as the necessary number of training aircraft (point DTO.GEN.240) in place to ensure proper training at all aerodromes and operating sites.
- (c) At each aerodrome or operating site of the DTO, the DTO should have in place the facilities (point DTO.GEN.215) as appropriate for the type of training carried out at each aerodrome or operating site.

## **AMC1 DTO.GEN.270(a) Annual internal review and annual activity report**

### **ANNUAL INTERNAL REVIEW**

The annual internal review should consist of a comprehensive assessment whether the DTO effectively carries out the tasks and responsibilities pursuant to point DTO.GEN.210. Specific emphasis should be given to the following:

- (a) availability of sufficient resources;
- (b) conduct of training in accordance with the requirements of Part-FCL and Part-DTO, with the DTO training programme(s) and with the DTO's safety policy;
- (c) random checks of training records and course completion certificates issued by the DTO;
- (d) assessment of the training programme(s) for its (their) adequacy and currency;
- (e) training aircraft including their documents and maintenance records;
- (f) aerodromes and operating sites, including associated facilities;
- (g) evaluation of both adequacy and effectiveness of the follow-up, corrective and, as applicable, remedial action taken after non-compliances that have been detected internally or that have been subject to findings as per point DTO.GEN.150;
- (h) assessment of the safety policy including its means and methods as defined in AMC1 DTO.GEN.210(a)(1)(ii) for its adequacy and currency;
- (i) assessment of the effectiveness of the implementation of the mitigation measures, as foreseen in the DTO's safety policy.

## **AMC1 DTO.GEN.270(b) Annual internal review and annual activity report**

### **ANNUAL ACTIVITY REPORT**

- (a) With regard to the past calendar year, the annual activity report should contain at least lists of:
  - (1) all training courses and refresher trainings actually provided;
  - (2) names of all flight, synthetic flight and theoretical knowledge instructors involved in the provision of training, including, in the case of DTOs for aeroplanes, helicopters and sailplanes, information on the aerodromes and operating sites of the DTO where it has mainly been providing training;
  - (3) number of students per training course;
  - (4) all training aircraft and FSTDs used, including registration marks and FSTD qualification letter codes (as applicable), including, with regard to each aircraft, information on:
    - (i) the training courses for which the aircraft has been used; and
    - (ii) the aerodromes of the DTO where the aircraft has been mainly used;
  - (5) all occurrences, accidents and incidents that occurred during the training courses; and
  - (6) any other information that is deemed relevant by the DTO.

## **AMC1 DTO.GEN.270(c) Annual internal review and annual activity report**

### **SUBMISSION OF ANNUAL INTERNAL REVIEW AND ANNUAL ACTIVITY REPORT TO THE CAAT.**

The annual internal review and the annual activity report for each past calendar year should be submitted to the competent authority within a time frame agreed between the DTO and the competent authority.

## **GM1 DTO.GEN.270(c) Annual internal review and annual activity report**

### **SUBMISSION OF ANNUAL INTERNAL REVIEW AND ANNUAL ACTIVITY REPORT TO THE COMPETENT AUTHORITY**

It is recommended that the CAAT and the DTO agree on the regular time frames; for example, to agree that the annual internal review and annual activity report for the past calendar year should be submitted during the first quarter of each year.