

Standards Document No. 51 version 1

Guidance for Examiners and Candidates

**Process for the Testing of English Language
Proficiency**

**UK CAA process for testing to ICAO Standards and Part-FCL
requirements in respect of Language Proficiency**

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Section 1 – Introduction

1.1 Introduction

The International Civil Aviation Organisation (ICAO) of which the United Kingdom is a Contracting State establishes international standards and recommended practices (SARPS) for, among other things, the licensing of aviation personnel. These SARPS which ICAO Member States are obliged to implement are published in Annex 1 – Personnel Licensing to the Convention on International Civil Aviation⁽¹⁾ (ICAO Annex 1).

Applicable from 5 March 2008, ICAO introduced into ICAO Annex I a requirement for all pilots of aeroplane, helicopter, airship and powered lift aircraft, all flight navigators who use radiotelephony equipment in aircraft and all air traffic controllers, to be proficient in their command of the languages that they use for radio communication. A proficiency scale of 1 to 6 is specified, with Level 6 being the standard of an expert speaker of the language. ICAO Annex 1 specifies the minimum standard for the holder of a licence to be Level 4.

It also specifies that licence holders assessed as Level 4 or 5 shall be re-tested periodically but that a person assessed as Level 6 need not be re-tested. The maximum periods between tests stated in the ICAO documents for Levels 4 and 5 are recommendations only. If the language proficiency of an individual is assessed as being below Level 4 (i.e. 1, 2 or 3) that individual may not hold a licence that includes radiotelephony privileges. The ICAO standards apply to the language “used for radio communication”; ICAO permits languages other than English in circumstances where flight crew and air traffic controllers share another common language.

Under European legislation the European Commission, assisted by the European Aviation Safety Agency (EASA), ensure that the requirements set out in the EASA Aircrew Regulation⁽²⁾ for Part-FCL⁽³⁾ licences meet ICAO standards. Similarly, the CAA is required under UK legislation to ensure that national licences comply with ICAO standards where applicable.

The ICAO standards for language proficiency have been in use in the UK and the other EASA Member States for some time, but the EASA Aircrew Regulation makes their application mandatory and imposes a common format for showing language proficiency on Part-FCL licences.

For Part-FCL licences, the language proficiency standards are set out in Part-FCL. These are equivalent to the standards already in use in the UK. Part-FCL requires that holders of an Instrument Rating shall demonstrate language proficiency in English.

The ICAO Annex I Language Proficiency Ratings are reproduced in Part-FCL. The relevant extract is shown in Appendix 2 to this document.

(1) ICAO Doc No 7300

(2) Commission Regulation 1178/2011 as amended by Regulation 290/2012.

(3) Annex I to Commission Regulation 1178/2011 as amended by Regulation 290/2012.

Section 2 – Language Proficiency Implementation and Assessment

2.1 General

The CAA applies the EASA standards and procedures to both Part-FCL licences and national licences issued by the CAA. Whilst the EU regulations include language proficiency standards (as they are included in ICAO Annex 1), they do not include the requirements to be complied with to be granted a licence to operate radio communication equipment installed in an aircraft; such licences remain under national legislation. In the UK this is a Flight Radiotelephony Operator's Licence (FRTOL) – See CAP 804 for more information.

2.2 Licences Requiring Language Proficiency Endorsement

Part-ARA specifies that the language proficiency level and validity shall be stated on a Part-FCL licence.

Therefore, pilots must hold a valid language proficiency level prior to the issue of a licence in accordance with Part-FCL. Language proficiency must be assessed as Level 4 or higher before any EASA licence requiring such proficiency is issued.

Part-FCL specifies that pilots who are to use radiotelephony shall demonstrate language proficiency. Such proficiency is required, in ENGLISH, for the issue of a UK FRTOL. Where a pilot accepts the limitation of flying non-radio only, or the pilot is the holder of a sailplane or balloon licence, Part-FCL does not require language proficiency to be demonstrated.

Holders of national licences that are not ICAO compliant, such as the UK NPPL, will not be required to have their licences endorsed with the ICAO Language Proficiency endorsement. However, the CAA may offer this service for those who require it.

Holders of UK issued NPPL(M), PPL(M) and PPL(G) will not require ICAO Language Proficiency endorsement, but may choose to have their licence so endorsed. However, if they hold a UK FRTOL in association with the above national licences then they are required to hold a valid Language Proficiency level. A UK FRTOL held by a licence holder will not be valid unless and until the applicant has a valid endorsement of language proficiency at Level 4, 5 or 6.

2.3 Minimum Language Proficiency Levels

The applicant for a language proficiency endorsement shall demonstrate, in accordance with Appendix 2 to Part-FCL, at least operational level (Level 4) of language proficiency both in the use of phraseologies and plain language.

- Level 4 Operational level – validity 4 years
- Level 5 Extended level – validity 6 years
- Level 6 Expert level – non-expiring

2.4 Means of Assessment of Language Proficiency

Methods of Testing

a) *At the Radiotelephony Test*

During the practical test for the UK FRTOL a CAA authorised RTF Examiner who has Level 6 proficiency in English, will assess the applicant's proficiency in English. Where the examiner assesses the candidate as being Expert Level 6, he may certify to that effect by submitting a Form SRG1199 to the CAA.

If the Examiner considers that the applicant is not at Level 6 the Examiner must not give a proficiency endorsement. The applicant should then seek an expert assessment, such as through a CAA approved language school as under (c) below. A FRTOL will not be issued unless and until the applicant has a valid endorsement of language proficiency at Level 4, 5 or 6.

b) At a Flight Test

Class Rating Examiners (CREs), Flight Examiners (FEs), Flight Instructor Examiners (FIEs), Instrument Rating Examiners (IREs), Synthetic Flight Examiners (SFEs) and Type Rating Examiners (TRES) who have themselves been assessed as proficient at Level 6 in English and are authorised by the CAA, may include assessment of the language proficiency for new or existing holders of licences issued by the CAA (Part-FCL or national), as part of the skill test, proficiency check or assessment of competence that is conducted for the issue, revalidation or renewal of a licence, rating or certificate.

Examiners can only assess candidates as being Expert Level 6 in English.

Where the assessment was conducted in association with a Skill Test, Proficiency Check, Assessment of Competence then the Examiner will complete the appropriate Examiners Report confirming that the candidate has demonstrated proficiency at Level 6.

Where the examiner cannot be satisfied that the applicant is at Level 6 the examiner must not give a proficiency endorsement. In such cases the alternative means of assessment must be used as detailed below (and in CAP 804 Part I, Section 4, Part M).

c) Through a Language School

Applicants choosing to be tested by a language school should verify that the school is approved by the CAA for the purpose of language assessment.

d) At a Training Organisation

There are ATOs specifically approved by the CAA to conduct language training modules that meet the requirements of Part-FCL.055, as part of an individual's overall training package.

e) Other Acceptable Means

Language proficiency may also be assessed by other means acceptable to the CAA. Such means of assessment may be determined by an operator or organisation to make efficient use of their own resources, but in any case must be approved by the CAA and meet the requirements of Part-FCL.055 before being put into effect.

One such acceptable means, for 'expert speakers' Level 6 only, is for the holder of a CAA issued examiner certificate (as listed in (a) and (b) above) to conduct a language assessment as a face to face aviation-related conversation that is not associated with a Skill Test, Proficiency Check, Assessment of Competence or Flight Radio Telephony practical test.

The face to face language assessment will take the form of an aviation related conversation initially established through a general conversation, then radio phraseology and pronunciation. Discussion topics could include the planning of a navigation exercise; discussing en route navigational issues; NOTAMs and weather; conducting the pre-flight inspection of the aircraft or similar, so that the examiner can assess the candidate's language proficiency in accordance with Appendix 2 to Part-FCL (see Appendix 2 below).

The student and the examiner must be together at the same location when the language assessment is to take place, so that the discussion is effectively face-to-face. The examiner must be satisfied that the person presenting themselves for assessment is who they claim to be. This may be achieved by means of photographic identification; (e.g. passport or driving licence with photograph).

Section 3 - Transitional Arrangements for UK Licence Holders

In order to comply with the ICAO obligations the CAA has, since 2008, issued licences that include the statement "Language Proficiency: English". To facilitate compliance with ICAO Annex I in 2008 it was accepted by the CAA at that time that any holder of a UK FRTOL would be proficient to at least Level 4. This was a once only credit that was given on the assumption that pilots would subsequently be assessed and so renew or upgrade their proficiency level.

The level of proficiency is not stated on licences issued by the CAA prior to 17 September 2012, but the CAA records for individual pilots will show Level 4 for FRTOL holders (expiring 4 years after the licence was issued), or Level 5 or 6 if acceptable evidence of proficiency to those levels has been submitted to the CAA.

To comply with the EASA Aircrew Regulation, Part-FCL licences for aeroplanes, helicopters and airships issued by the CAA must show the level of language proficiency. Applicants for new or replacement licences, or for the conversion of national licences, must supply evidence of language proficiency in English – (or have previously been accepted by the CAA as being at a level that has not expired on the date the new licence is issued).

Language Assessment is required irrespective of nationality or standard of education of the licence holder. If they hold a CAA issued Part-FCL or national licence and will use radio telephony then they must comply with the requirement to have a valid Language Proficiency level in English.

UK licence holders who need to revalidate/renew a language proficiency endorsement previously granted by the UK CAA may do so by any of the methods set out in 2.4 above.

Section 4 – Licence Endorsement Process

4.1 Part-FCL licences

Pilots applying for the initial issue of a Part-FCL licence for aeroplanes, helicopters or airships must demonstrate the appropriate level of language proficiency. This may be notified to the CAA by completion of either the examiner's skill test report form or the application for the FRTOL.

Pilots applying for the issue of a Part-FCL licence by conversion of their existing UK national licence or their UK issued JAR-FCL licence will also need to provide evidence that they have a valid language proficiency level.

Unless a previously completed language assessment has been submitted to the CAA, and remains valid, applicants will need to provide evidence of proficiency, (by any of the methods set out in 2.4 above).

Please note that pilots who hold a UK CAA issued JAR-FCL licence are required to have this replaced with a Part-FCL licence during the next administrative action to be taken on their licence. Also pilots who hold a UK CAA issued national licence (not including NPPL) which includes an EASA Type Rating, must convert the licence to a Part-FCL licence during the next administrative action to be taken on their licence.

4.2 Charges

The CAA does not intend to levy a charge on individual licence holders or organisations for the recording of Language Proficiency in CAA records. However, for the initial issue of any licence and for the conversion of existing UK licences, fees will be levied for the administration of the licence in accordance with the Scheme of Charges.

Examiners may levy a fee for the language assessment not associated with a Skill Test, Proficiency Check, Assessment of Competence or RTF Practical Test.

Appendix 1 – Part-FCL FCL.055

FCL.055 Language proficiency

- (a) *General.* Aeroplane, helicopter, powered-lift and airship pilots required to use the radio telephone shall not exercise the privileges of their licences and ratings unless they have a language proficiency endorsement on their licence in either English or the language used for radio communications involved in the flight. The endorsement shall indicate the language, the proficiency level and the validity date.
- (b) The applicant for a language proficiency endorsement shall demonstrate, in accordance with Appendix 2 to this Part, at least an operational level of language proficiency both in the use of phraseologies and plain language. To do so, the applicant shall demonstrate the ability to:
- (1) communicate effectively in voice-only and in face-to-face situations;
 - (2) communicate on common and work-related topics with accuracy and clarity;
 - (3) use appropriate communicative strategies to exchange messages and to recognise and resolve misunderstandings in a general or work-related context;
 - (4) handle successfully the linguistic challenges presented by a complication or unexpected turn of events which occurs within the context of a routine work situation or communicative task with which they are otherwise familiar; and
 - (5) use a dialect or accent which is intelligible to the aeronautical community.
- (c) Except for pilots who have demonstrated language proficiency at an expert level, in accordance with Appendix 2 to this Part, the language proficiency endorsement shall be re-evaluated every:
- (1) 4 years, if the level demonstrated is operational level; or
 - (2) 6 years, if the level demonstrated is extended level.
- (d) *Specific requirements for holders of an instrument rating (IR).* Without prejudice to the paragraphs above, holders of an IR shall have demonstrated the ability to use the English language at a level that allows them to:
- (1) understand all the information relevant to the accomplishment of all phases of a flight, including flight preparation;
 - (2) use radio telephony in all phases of flight, including emergency situations;
 - (3) communicate with other crew members during all phases of flight, including flight preparation.
- (e) The demonstration of language proficiency and of the use of English for IR holders shall be done through a method of assessment established by the competent authority.

Note:

The ICAO Language Proficiency Ratings for Levels 4, 5 and 6 are set out in Appendix 2 to Part-FCL.

Acceptable Means of Compliance (AMC) 1, 2 and 3 to FCL.055 that support the requirements are published by EASA in Decision No 2011/016/R of the Executive Director of the European Aviation Safety Agency of 15 December 2011 (Part-FCL AMC/GM).

Appendix 2 – Appendix 2 to Part-FCL

Language Proficiency Rating Scale – Expert, extended and operational level

| Level | Pronunciation | Structure | Vocabulary | Fluency | Comprehension | Interactions |
|----------------------------------|--|---|---|---|--|--|
| Expert (Level 6) | Pronunciation, stress, rhythm and intonation, though possibly influenced by the first language or regional variation, almost never interfere with ease of understanding. | Both basic and complex grammatical structures and sentence patterns are consistently well controlled. | Vocabulary range and accuracy are sufficient to communicate effectively on a wide variety of familiar and unfamiliar topics. Vocabulary is idiomatic, nuanced, and sensitive to register. | Able to speak at length with a natural, effortless flow. Varies speech flow for stylistic effect, e.g. to emphasize a point. Uses appropriate discourse markers and connectors spontaneously. | Comprehension is consistently accurate in nearly all contexts and includes comprehension of linguistic and cultural subtleties. | Interacts with ease in nearly all situations. Is sensitive to verbal and non-verbal cues and responds to them appropriately. |
| Extended (Level 5) | Pronunciation, stress, rhythm, and intonation, though influenced by the first language or regional variation, rarely interfere with ease of understanding. | Basic grammatical structures and sentence patterns are consistently well controlled. Complex structures are attempted but with errors which sometimes interfere with meaning. | Vocabulary range and accuracy are sufficient to communicate effectively on common, concrete, and work-related topics. Paraphrases consistently and successfully. Vocabulary is sometimes idiomatic. | Able to speak at length with relative ease on familiar topics but may not vary speech flow as a stylistic device. Can make use of appropriate discourse markers or connectors. | Comprehension is accurate on common, concrete, and work-related topics and mostly accurate when the speaker is confronted with a linguistic or situational complication or an unexpected turn of events. Is able to comprehend a range of speech varieties (dialect and/or accent) or registers. | Responses are immediate, appropriate, and informative. Manages the speaker/listener relationship effectively. |
| Operational (Level 4) | Pronunciation, stress, rhythm, and intonation are influenced by the first language or regional variation but only sometimes interfere with ease of understanding. | Basic grammatical structures and sentence patterns are used creatively and are usually well controlled. Errors may occur, particularly in unusual or unexpected circumstances, but rarely interfere with meaning. | Vocabulary range and accuracy are usually sufficient to communicate effectively on common, concrete, and work-related topics. Can often paraphrase successfully when lacking vocabulary in unusual or unexpected circumstances. | Produces stretches of language at an appropriate tempo. There may be occasional loss of fluency on transition from rehearsed or formulaic speech to spontaneous interaction, but this does not prevent effective communication. Can make limited use of discourse markers or connectors. Fillers are not distracting. | Comprehension is mostly accurate on common, concrete, and work-related topics when the accent or variety used is sufficiently intelligible for an international community of users. When the speaker is confronted with a linguistic or situational complication or an unexpected turn of events, comprehension may be slower or require clarification strategies. | Responses are usually immediate, appropriate, and informative. Initiates and maintains exchanges even when dealing with an unexpected turn of events. Deals adequately with apparent misunderstandings by checking, confirming, or clarifying. |

Appendix 3 – AMC to Part-FCL FCL.055

GENERAL

- (a) The language proficiency assessments should be designed to reflect a range of tasks undertaken by pilots but with specific focus on language rather than operational procedures.
- (b) The assessment should determine the applicant's ability to:
 - (1) Communicate effectively using standard R/T phraseology;
 - (2) Deliver and understand messages in plain language in both usual and unusual situations that necessitate departure from standard R/T phraseology.

Note: refer to the Manual on the Implementation of ICAO Language Proficiency Requirements (ICAO Doc 9835), Appendix A Part III and Appendix B for further guidance.

ASSESSMENT

- (c) The assessment may be subdivided into three elements, as follows:
 - (1) Listening: assessment of comprehension;
 - (2) Speaking: assessment of pronunciation, fluency, structure and vocabulary;
 - (3) Interaction.
- (d) The three elements mentioned above may be combined and they can be covered by using a wide variety of means or technologies.
- (e) Where appropriate, some or all of these elements may be achieved through the use of the R/T testing arrangements.
- (f) When the elements of the testing are assessed separately the final assessment should be consolidated in the language proficiency endorsement issued by the competent authority.
- (g) The assessment may be conducted during one of the several existing checking or training activities, such as licence issue or rating issue and revalidation, line training, operator line checks or proficiency checks.
- (h) The competent authority may use its own resources in developing or conducting the language proficiency assessment, or may delegate this task to language assessment bodies.
- (i) The competent authority should establish an appeal procedure for applicants.
- (j) The holder of a licence should receive a statement containing the level and validity of the language endorsements.
- (k) Where the assessment method for the English language established by the competent authority is equivalent to that established for the assessment of use of the English language in accordance with AMC 2 FCL.055, the same assessment may be used for both purposes.

AMC 2 to Part-FCL FCL.055**BASIC ASSESSMENT REQUIREMENTS**

- (I) The aim of the assessment is to determine the ability of an applicant for a pilot licence or a licence holder to speak and understand the language used for R/T communications.
- (1) The assessment should determine the ability of the applicant to use both:
 - (i) standard R/T phraseology;
 - (ii) plain language, in situations when standardised phraseology cannot serve an intended transmission.
 - (2) The assessment should include:
 - (i) voice-only or face-to-face situations;
 - (ii) common, concrete and work-related topics for pilots.
 - (3) The applicants should demonstrate their linguistic ability in dealing with an unexpected turn of events, and in solving apparent misunderstandings.
 - (4) The assessment should determine the applicant's speaking and listening abilities. Indirect assessments, of grammatical knowledge, reading and writing, are not appropriate.
 - (5) The assessment should determine the language skills of the applicant in the following areas:
 - (i) pronunciation:
 - (A) the extent to which the pronunciation, stress, rhythm and intonation are influenced by the applicant's first language or national variations;
 - (B) how much they interfere with ease of understanding.
 - (ii) structure:
 - (A) the ability of the applicant to use both basic and complex grammatical structures;
 - (B) the extent to which the applicant's errors interfere with the meaning.
 - (iii) vocabulary:
 - (A) the range and accuracy of the vocabulary used;
 - (B) the ability of the applicant to paraphrase successfully when lacking vocabulary.
 - (iv) fluency:
 - (A) tempo;
 - (B) hesitancy;
 - (C) rehearsed versus spontaneous speech;
 - (D) use of discourse markers and connectors.
 - (v) comprehension:
 - (A) on common, concrete and work-related topics;
 - (B) when confronted with a linguistic or situational complication or an unexpected turn of events.

Note: the accent or variety of accents used in the test material should be sufficiently intelligible for an international community of users.

- (vi) interactions:
 - (A) quality of response (immediate, appropriate, and informative);
 - (B) the ability to initiate and maintain exchanges:
 - (a) on common, concrete and work-related topics;
 - (b) when dealing with an unexpected turn of events;
 - (C) the ability to deal with apparent misunderstandings by checking, confirming or clarifying.

Note: the assessment of the language skills in the areas mentioned above is conducted using the rating scale in AMC2 FCL.055.

- (6) When the assessment is not conducted in a face-to-face situation, it should use appropriate technologies for the assessment of the applicant's abilities in listening and speaking, and for enabling interactions (for example: simulated pilot or controller communication).

ASSESSORS

- (m) It is essential that the persons responsible for language proficiency assessment ('assessors') are suitably trained and qualified. They should be either aviation specialists (for example current or former flight crew members or air traffic controllers), or language specialists with additional aviation-related training. An alternative approach would be to form an assessment team consisting of an operational expert and a language expert.
 - (1) The assessors should be trained on the specific requirements of the assessment.
 - (2) The assessors should not test applicants to whom they have given language training.

CRITERIA FOR THE ACCEPTABILITY OF LANGUAGE ASSESSMENT BODIES

- (n) To ensure an impartial assessment process, the language assessment should be independent of the language training.
 - (1) To be accepted, the language assessment bodies should demonstrate:
 - (i) appropriate management and staffing;
 - (ii) quality system established and maintained to ensure compliance with, and adequacy of, assessment requirements, standards and procedures.
 - (2) The quality system established by a language assessment body should address the following:
 - (i) management;
 - (ii) policy and strategy;
 - (iii) processes;
 - (iv) the relevant provisions of ICAO or Part-FCL, standards and assessment procedures;
 - (v) organisational structure;
 - (vi) responsibility for the development, establishment and management of the quality system;
 - (vii) documentation;
 - (viii) quality assurance programme;
 - (ix) human resources and training (initial and recurrent);
 - (x) assessment requirements;
 - (xi) customer satisfaction.
 - (3) The assessment documentation and records should be kept for a period of time determined by the competent authority and made available to this competent authority, on request.

- (4) The assessment documentation should include at least the following:
- (i) assessment objectives;
 - (ii) assessment layout, time scale, technologies used, assessment samples, voice samples;
 - (iii) assessment criteria and standards (at least for the levels 4, 5 and 6 of the rating scale mentioned in AMC2 FCL.055);
 - (iv) documentation demonstrating the assessment validity, relevance and reliability;
 - (v) assessment procedures and responsibilities:
 - (A) preparation of individual assessment;
 - (B) administration: location(s), identity check and invigilation, assessment discipline, confidentiality or security;
 - (C) reporting and documentation provided to the competent authority or to the applicant, including sample certificate;
 - (D) retention of documents and records.

Note: refer to the 'Manual on the Implementation of ICAO Language Proficiency Requirements' (ICAO Doc 9835) for further guidance.

AMC 3 to Part-FCL FCL.055

RATING SCALE

The following table describes the different levels of language proficiency:

| LEVEL | PRONUNCIATION | STRUCTURE | VOCABULARY | FLUENCY | COMPREHENSION | INTERACTIONS |
|-------------------------------|--|---|---|---|--|--|
| | <i>Assumes a dialect or accent intelligible to the aeronautical community</i> | <i>Relevant grammatical structures and sentence patterns are determined by language functions appropriate to the task.</i> | | | | |
| Expert (Level 6) | Pronunciation, stress, rhythm and intonation, though possibly influenced by the first language or regional variation, almost never interfere with ease of understanding. | Both basic and complex grammatical structures and sentence patterns are consistently well controlled. | Vocabulary range and accuracy are sufficient to communicate effectively on a wide variety of familiar and unfamiliar topics. Vocabulary is idiomatic, nuanced, and sensitive to register. | Able to speak at length with a natural, effortless flow. Varies speech flow for stylistic effect, e.g. to emphasize a point. Uses appropriate discourse markers and connectors spontaneously. | Comprehension is consistently accurate in nearly all contexts and includes comprehension of linguistic and cultural subtleties. | Interacts with ease in nearly all situations. Is sensitive to verbal and non-verbal cues and responds to them appropriately. |
| Extended (Level 5) | Pronunciation, stress, rhythm, and intonation, though influenced by the first language or regional variation, rarely interfere with ease of understanding. | Basic grammatical structures and sentence patterns are consistently well controlled. Complex structures are attempted but with errors which sometimes interfere with meaning. | Vocabulary range and accuracy are sufficient to communicate effectively on common, concrete, and work-related topics. Paraphrases consistently and successfully. Vocabulary is sometimes idiomatic. | Able to speak at length with relative ease on familiar topics but may not vary speech flow as a stylistic device. Can make use of appropriate discourse markers or connectors. | Comprehension is accurate on common, concrete, and work-related topics and mostly accurate when the speaker is confronted with a linguistic or situational complication or an unexpected turn of events. Is able to comprehend a range of speech varieties (dialect and/or accent) or registers. | Responses are immediate, appropriate, and informative. Manages the speaker/listener relationship effectively. |

| LEVEL | PRONUNCIATION | STRUCTURE | VOCABULARY | FLUENCY | COMPREHENSION | INTERACTIONS |
|----------------------------------|---|---|--|---|--|--|
| | <i>Assumes a dialect or accent intelligible to the aeronautical community</i> | <i>Relevant grammatical structures and sentence patterns are determined by language functions appropriate to the task.</i> | | | | |
| Operational (Level 4) | Pronunciation, stress, rhythm, and intonation are influenced by the first language or regional variation but only sometimes interfere with ease of understanding. | Basic grammatical structures and sentence patterns are used creatively and are usually well controlled. Errors may occur, particularly in unusual or unexpected circumstances, but rarely interfere with meaning. | Vocabulary range and accuracy are usually sufficient to communicate effectively on common, concrete, and work-related topics. Can often paraphrase successfully when lacking vocabulary in unusual or unexpected circumstances. | Produces stretches of language at an appropriate tempo. There may be occasional loss of fluency on transition from rehearsed or formulaic speech to spontaneous interaction, but this does not prevent effective communication. Can make limited use of discourse markers or connectors. Fillers are not distracting. | Comprehension is mostly accurate on common, concrete, and work-related topics when the accent or variety used is sufficiently intelligible for an international community of users. When the speaker is confronted with a linguistic or situational complication or an unexpected turn of events, comprehension may be slower or require clarification strategies. | Responses are usually immediate, appropriate, and informative. Initiates and maintains exchanges even when dealing with an unexpected turn of events. Deals adequately with apparent misunderstandings by checking, confirming, or clarifying. |
| Pre-Operational (Level 3) | Pronunciation, stress, rhythm, and intonation are influenced by the first language or regional variation and frequently interfere with ease of understanding. | Basic grammatical structures and sentence patterns associated with predictable situations are not always well controlled. Errors frequently interfere with meaning | Vocabulary range and accuracy are often sufficient to communicate effectively on common, concrete, and work-related topics but range is limited and the word choice often inappropriate. Is often unable to paraphrase successfully when lacking vocabulary. | Produces stretches of language, but phrasing and pausing are often inappropriate. Hesitations or slowness in language processing may prevent effective communication. Fillers are sometimes distracting. | Comprehension is often accurate on common, concrete, and work-related topics when the accent or variety used is sufficiently intelligible for an international community of users. May fail to understand a linguistic or situational complication or an unexpected turn of events. | Responses are sometimes immediate, appropriate, and informative. Can initiate and maintain exchanges with reasonable ease on familiar topics and in predictable situations. Generally inadequate when dealing with an unexpected turn of events. |

| LEVEL | PRONUNCIATION | STRUCTURE | VOCABULARY | FLUENCY | COMPREHENSION | INTERACTIONS |
|---------------------------------|--|--|---|---|---|---|
| | <i>Assumes a dialect or accent intelligible to the aeronautical community</i> | <i>Relevant grammatical structures and sentence patterns are determined by language functions appropriate to the task.</i> | | | | |
| Elementary (Level 2) | Pronunciation, stress, rhythm, and intonation are heavily influenced by the first language or regional variation and usually interfere with ease of understanding. | Shows only limited control of few simple memorised grammatical structures and sentence patterns. | Limited vocabulary range consisting only of isolated words and memorised phrases. | Can produce very short, isolated, memorised utterances with frequent pausing and a distracting use of fillers to search for expressions and articulate less familiar words. | Comprehension is limited to isolated, memorised phrases when they are carefully and slowly articulated. | Response time is slow, and often inappropriate. Interaction is limited to simple routine exchanges. |
| Pre-Elementary (Level 1) | Performs at a level below the elementary level. | Performs at a level below the elementary level. | Performs at a level below the elementary level. | Performs at a level below the elementary level. | Performs at a level below the elementary level. | Performs at a level below the elementary level. |

Note: operational Level (Level 4) is the minimum required proficiency level for R/T communication.

Levels 1 through 3 describe pre-elementary, elementary and pre-operational levels of language proficiency respectively, all of which describe a level below the language proficiency requirement.

Levels 5 and 6 describe extended and expert levels at levels of proficiency more advanced than the minimum required standard.

Appendix 4 – UK Air Navigation Order (ANO) 2012 - Extract

UK Flight Radio Telephony Operators Licence

Article 50 – Requirement for appropriate licence to act as member of flight crew of EASA aircraft registered in United Kingdom.

.....

- (3) Subject to the exceptions set out in articles 51, 57 and 59 a person must not act as a flight radiotelephony operator, a flight engineer or a flight navigator of an EASA aircraft that is registered in the United Kingdom without holding an appropriate licence granted or rendered valid under this Order.

Article 50A – Requirement for appropriate licence to act as member of flight crew of non-EASA aircraft registered in the United Kingdom.

.....

- (3) A person must not act as a member of the flight crew of an excepted aircraft unless—
- (a) the person acts as a flight radiotelephony operator, flight engineer or flight navigator and holds an appropriate licence granted or rendered valid under this Order; or
 - (b) the person holds an appropriate licence granted, converted or rendered valid under the EASA Aircrew Regulation.

Article 51 – Exception to act as flight radiotelephony operator

- (1) A person may act as a flight radiotelephony operator within the United Kingdom, the Channel Islands and the Isle of Man without being the holder of an appropriate licence granted or rendered valid under this Order, if the conditions in paragraph (2) apply.
- (2) The conditions referred to in paragraph (1) are that the person is:
- (a) the pilot of a glider on a private flight and does not communicate by radiotelephony with any air traffic control unit, flight information unit or air/ground communications service unit; or
 - (b) being trained in an aircraft registered in the United Kingdom to perform duties as a member of the flight crew of an aircraft and is authorised to operate the radiotelephony station by the holder of the licence granted for that station under any enactment.