EHA Position Paper

FCL.710 Training Requirements for Bell 206 Series

Executive Summary

An inconsistency exists within EASA Part-FCL regarding the training pathway under FCL.710 for, as an example, the Bell 206 helicopter series. Under current implementation, pilots transitioning between Bell 206 JetRanger (five-seat) and Bell 206 LongRanger (six- or seven-seat) variants require differences training purely based on seating capacity, despite both models sharing the same type certificate, cockpit layout, and handling characteristics.

This paper proposes a regulatory clarification to ensure that FCL.710 differences training is triggered by operational suitability data (OSD) and genuine technical or handling differences—not seating configuration alone.

1. Background

The Bell 206 JetRanger and LongRanger series are certificated under the same Type Certificate Data Sheet (TCDS) and share nearly identical flight characteristics. Both variants use similar systems, avionics layouts, and handling qualities. However, the LongRanger accommodates up to seven seats, while the JetRanger typically seats five. Under EASA's Type Rating and Licence Endorsement List (TR&LEL), this seat count difference has resulted in reinstatement of a (D) differences-training requirement between the two models.

Consequently, pilots may be required to complete formal differences training solely due to an increase in certified seating capacity, not because of substantive operational or technical differences.

2. Identified Anomaly

EASA Part-FCL.710 outlines that variant differences within a helicopter type rating must be supported by familiarisation or differences training based on operational suitability data (OSD) and actual systems or handling characteristics. It does not identify maximum seating capacity as a determinant.

However, the current TR&LEL table effectively applies a training distinction driven by seating configuration, conflating operational seating differences with technical complexity. This creates an inconsistency with the intent of FCL.710 and introduces unnecessary administrative burden and training variation.

3. Proposed Resolution

The EHA proposes that EASA clarify and amend the TR&LEL and associated guidance material as follows:

• In the TR&LEL, amend the Bell 206 JetRanger ↔ LongRanger training note from mandatory (D) to 'Familiarisation (F) unless OSD-identified system or handling differences apply'.
• In GM to FCL.710, add clarification: 'Changes in maximum certified seat configuration or cabin length within a helicopter type shall not, by themselves, determine that differences training is required under FCL.710; triggers shall be based on OSD-identified systems or handling

differences.'

If EASA maintains the (D) requirement, it should be defined as Level A/B differences only (knowledge and simple part-task), explicitly excluding seat count as a factor.

4. Rationale

The proposed clarification would align regulatory interpretation with the original intent of FCL.710, which seeks to ensure pilot competence based on technical and operational differences rather than administrative parameters such as seating configuration.

This change will remove unnecessary barriers to pilot mobility between similar helicopter variants, promote consistency across training organisations, and maintain the safety objectives of the regulation.

5. Conclusion

The EHA recommends that EASA issue a minor amendment to the TR&LEL and accompanying GM to FCL.710 to remove seating capacity as an implicit driver of training differentiation within the Bell 206 family.

Such clarification will simplify compliance, ensure harmonised interpretation across Member States, and reinforce that pilot training should be based on aircraft capability and OSD-derived criteria—not seat count.