

Thursday, November 2nd, 2023

CAA Consultation°2: Advertising

-

How to answer? Wingly advises

November 2nd - November 30th



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Closes 30 Nov 2023

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Introduction

1. What is your name?

Name

2. What is your email address?

Email

3. What is your organisation?

Organisation

Wingly Notes:

- Enter your personal info
- For organisation, we suggest to simply enter :
"Private Pilot"

Save and come back later...

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Proposed changes to the advertising element of the cost sharing regulations

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consultation questions

4. Do you currently or have you ever advertised a cost sharing flight online?

(Required)

- Yes
- No
- Prefer not to say

Wingly Notes:

Answer accordingly.

5. Do you agree that the advertising element of the current cost sharing regulations should be reviewed and amended?

(Required)

- Yes
- No
- Prefer not to say

Wingly Notes:

Very important to answer "NO" here. No evidence to support misuse has been shown, and as the CAA is a risk based regulator, they must prove the need for change which they did not. What makes a flight commercial is the element of profit, not if the flight was advertised.

6. Prior to the UK joining EASA, the advertising of a cost sharing flight was prohibited outside of a flying club environment. Would you support a return to those requirements regarding the advertising of cost sharing flights? This required that: "no information has been published or advertised before the commencement of the flight other than, in the case of an aircraft operated by a flying club, advertising wholly within the premises of such a flying club in which case all the persons carried on such a flight who are aged 18 years or over must be members of that flying club".

(Required)

- Yes
- No
- Prefer not to say

Wingly Notes:

Very important to answer "NO" here. It is irrelevant to the current issues. The old UK regulation dates back to a period with no internet. It is normal that the regulation had to evolve with the birth of the collaborative economy.

7. In relation to the below proposed amendments: Cost sharing flights may be advertised. The advertisement must be placed by the pilot intending to operate the flight and it must relate to a specific flight that the pilot intends to take place, regardless of whether passengers are available for carriage. The advertisement must include the start and end locations, as well as the dates when the pilot intends to conduct the flight. To what extent do you agree that this proposed amendment is clear and easy to follow?

(Required)

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Wingly Notes:

Very important to answer "Strongly Disagree" here. The particular phrasing used here remains susceptible to misinterpretation, making it unclear and challenging to follow. The use of terms like "a specific flight" and "dates" in the plural form contradicts the original intent.

8. In relation to the below proposed amendments: Cost sharing flights may be advertised. The advertisement must be placed by the pilot intending to operate the flight and it must relate to a specific flight that the pilot intends to take place, regardless of whether passengers are available for carriage. The advertisement must include the start and end locations, as well as the dates when the pilot intends to conduct the flight. To what extent do you agree that this proposed amendment is appropriate?

(Required)

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Wingly Notes:

Very important to answer “Strongly Disagree” here.

The big question to ask yourself is, will this change actually make a difference to those already doing illegal public transportation or only affect honest pilots who like to cost-share ?

9. Do you believe that a pilot should have to include any of the following information in their advertisement to ensure passengers are fully aware of a pilot’s credentials before booking to join a cost sharing flight? (Please select all that apply)

(Required)

- Licence type held (i.e. PPL)
- Medical held (i.e. Class 2, PMD)
- Flying experience
- Pilot Recency
- None of the above
- No opinion/Don't know

Wingly Notes:

Wingly agrees this is a great addition and already adheres to this.

10. Do you have any other comments on the consultation document that you would like to share?

general comments

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Wingly Notes:

- **Most important : be genuine, say what you have on your heart**
- **Detail how you use the platform, what are the benefit to you.**
- **Explain that you do advertise flights on regular dates, and that it doesn't make you feel like doing something that should be illegal**
- **Explain that with the rising cost of fuel, if Wingly shuts down you will definitely fly less**
- **Explain that you think it is sad that because of Brexit the CAA wants to withdraw some improvements that were EASA initiated**
- **Confirm that if the CAA wording goes through your usage of Wingly will become illegal.**

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Almost done...

You are about to submit your response. By clicking 'Submit Response' you give us permission to analyse and include your response in our results. After you click Submit, you will no longer be able to go back and change any of your answers.

When you submit your response, you will be sent a receipt and a link to a PDF copy of your response.

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Submit Response

Wingly Notes:

After submitting your response, please share the consultation with your fellow private pilots, friends and closed ones to maximise the chances of pushing for a change of wording.

Analysis : why would the current wording of the CAA make Wingly close in the UK?

➔ Current CAA wording proposal:

Cost sharing flights may be advertised. The advertisement must be placed by the pilot intending to operate the flight and it must relate to a specific flight that the pilot intends to take place, regardless of whether passengers are available for carriage. The advertisement must include the start and end locations as well as the dates when the pilot intends to conduct the flight.

➔ The part in red is really the crucial part in the wording which would make the current usage of Wingly illegal. Without the part in red the wording is fine.

➔ Private pilots use Wingly to fly more often, to conduct flights they regularly enjoy doing and that they would not have done if they would not have found a passenger to join them. It is the contrary of “regardless **of whether passengers are available for carriage**”. The whole purpose of Wingly is to allow pilots to advertise flights with the dates when they would potentially be available to fly, and find passengers to join them on a flights they would not have done otherwise. That is how Wingly helps pilots to fly more often. It is not to find additional passengers on the flights that are already planned by the pilot. For those flights, pilots usually already have company.

Tell us that you answered the consultation once it is done :

- ➔ It is for us to track how many pilots of the Wingly community answered to the consultation to be able to potentially compare to the numbers that will be given by the CAA in the results :

Link to the form: <https://forms.gle/8cyMjAHxeb4gMCkB6>