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Title	Certification Specifications for Flight Crew Data (CS FCD)
NPA Number	NPA 2012-05

UK CAA (European.Affairs@caa.co.uk) has placed **14** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
20	(General Comments)	0	**General Comment** **Page No:** All **Comment:** The OSD process will now be part of Certification. It is an Operational or Flight Standards function and making it part of Certification is likely to reduce the independent approach which has so usefully complemented aircraft evaluation in the past. Thought processes are different between the two areas and this diversity should be encouraged – it produces safer aircraft.	
21	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATIO SPECIFICATIO AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 16 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency **Comment:** The Table Difference Level for **TRAINING** (Level D) states: " · Manoeuvre Flight Simulation Training Devices (FSTDs), Full Flight Simulator (FFS) or aircraft to accomplish specific manoeuvres" FSTD is the generic name for FTD, FFS, FNPT and OTD. It is misleading to refer to FSTD, since this would suggest that FDT, OTD and FNPTs could also be used, were they Manoeuvre devices. The FAA document stated "Manoeuvre devices **", with a sub note suggesting that "**FFS or Aircraft may be used to accomplish specific manoeuvres". **Justification:** Clarity. **Proposed Text:** ~~" · Manoeuvre Flight Simulation Training Devices (FSTDs),~~ Full Flight Simulator (FFS) or aircraft to accomplish specific manoeuvres".	
22	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATIO SPECIFICATIO AND	15 - 26	**Page No:** 16 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency **Comment:** The Table Difference Level for **TRAINING** (Level E) states:	

	GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION		"· Level C or D simulator, or Aircraft" NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Part FCL recognises that Training may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity. **Proposed Text:** "· ~~Level C or D~~ **Full Flight** simulator, or · Aircraft"	
23	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 16 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency **Comment:** The Table Difference Level for **CHECKING** (Level E) states: "Proficiency check using level C or D simulator , or aircraft" NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity. **Proposed Text:** "· Proficiency check using ~~level C or D simulator~~ **FFS**, or aircraft"	
24	B. DRAFT RULES — I.	15 -	**Page No:** 16	

	DRAFT DECISION ON CERTIFICATIO SPECIFICATIO AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	26	**Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency **Comment:** The Table Difference Level for **CURRENCY** (Level E) states: "As per regulation (level C or D simulator , or aircraft)" NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Part FCL and Part OPs recognises that Currency may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity. **Proposed Text:** " As per regulation ~~(level C or D simulator~~ (**FFS**, or aircraft)"	
25	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATIO SPECIFICATIO AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 18 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency, para (b)(5) **Comment:** Paragraph (b)(5) Level E training states: "The training requires a 'high fidelity' environment to attain or maintain knowledge, skills, or abilities that can only be satisfied by the use of an FFS certified to level C or higher, or the aircraft itself. Level E training, if done in an aircraft, should be modified for safety reasons where manoeuvres can result in a high degree of risk." NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of	

			FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity. **Proposed Text:** "(5) Level E training The training requires a 'high fidelity' environment to attain or maintain knowledge, skills, or abilities that can only be satisfied by the use of an ~~FSS certified to level C or higher~~ **appropriately certified FFS**, or the aircraft itself. Level E training, if done in an aircraft, should be modified for safety reasons where manoeuvres can result in a high degree of risk."	
26	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 19 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency, pararaph (c)(5) **Comment:** Paragraph (c)(5) Level E checking states: "Level E differences checking requires that a full proficiency check be conducted in a level C or D FFS, or in an aircraft, following both initial and recurrent training. Alternating checks are possible between the relevant aircraft, if appropriate, and credit may be defined for procedures or manoeuvres based on commonality. Assignment of level E checking requirements alone, or in conjunction with level E currency, does not necessarily result in assignment of a separate type rating." NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. Appendix 9 to Part FCL states: "CONDUCT OF THE TEST/CHECK 6. The examiner may choose between different skill test or proficiency check scenarios containing simulated relevant operations developed and approved by the competent authority. Full flight simulators and other training devices, when available, shall be used, as established in this Part." The text should be amended as proposed below.	

			Justification: Consistency and clarity. **Proposed Text:** "(5) Level E checking Level E differences checking requires that a full proficiency check be conducted in ~~a level C or D~~ FFS, or in an aircraft, following both initial and recurrent training. Alternating checks are possible between the relevant aircraft, if appropriate, and credit may be defined for procedures or manoeuvres based on commonality. Assignment of level E checking requirements alone, or in conjunction with level E currency, does not necessarily result in assignment of a separate type rating."	
27	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 20 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency, pararaph (d)(5) **Comment:** Paragraph (d)(5) Level E currency states: "(i) Level E currency requires that recent experience requirements of Part-FCL and operational requirements be complied with in each aircraft separately. Level E currency may also specify other system, procedure, or manoeuvre currency item(s) necessary for safe operations, and requires procedures or manoeuvres to be accomplished in a level C or D simulator. Provisions are applied in a way which addresses the required system or manoeuvre experience." NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and Clarity. **Proposed Text:** "(5) Level E currency (i) Level E currency requires that recent experience requirements of Part-FCL and operational requirements be complied with in each aircraft separately. Level E currency	

			may also specify other system, procedure, or manoeuvre currency item(s) necessary for safe operations, and requires procedures or manoeuvres to be accomplished in a ~~level C or D~~ **Full Flight** simulator **or aircraft** . Provisions are applied in a way which addresses the required system or manoeuvre experience."	
28	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 21 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency, pararaph (d)(5)(i) **Comment:** Paragraph (d)(5)(i) Level E currency, final sub-paragraph states: "When CTLC is permitted, any credit or constraints applicable to using level C or D simulators are also to be determined." NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity. **Proposed Text:** "(5) Level E currency When CTLC is permitted, any credit or constraints applicable to using ~~level C or D simulators~~ **FFS** are also to be determined."	
29	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA)	15 - 26	**Page No:** 21 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency, paragraph (e)(3) **Comment:** Paragraph (e)(3) Level E currency states: "(i) Level E currency requires that recent experience requirements of Part-FCL and operational requirements be complied with in each aircraft separately. Level E currency may also specify other system, procedure, or manoeuvre currency item(s) necessary for safe operations, and requires procedures or manoeuvres to be accomplished in a level C or D simulator. Provisions are applied in a way	

	— CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION		which addresses the required system or manoeuvre experience." NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity. **Proposed Text:** "(3) Level E currency (i) Level E currency requires that recent experience requirements of Part-FCL and operational requirements be complied with in each aircraft separately. Level E currency may also specify other system, procedure, or manoeuvre currency item(s) necessary for safe operations, and requires procedures or manoeuvres to be accomplished in a ~~level C or D~~ **Full Flight** simulator **or aircraft** . Provisions are applied in a way which addresses the required system or manoeuvre experience."	
30	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 22 **Paragraph No:** CS FCD.425 Difference levels — Training, checking and currency, paragraph (e)(3)(i) **Comment:** Paragraph (e)(3)(i) Level E currency, final sub-paragraph states: "When CTLC is permitted, any credit or constraints applicable to using level C or D simulators are to be determined" NPA 2012-25 is based on the Common Procedures Document for Conducting Operational Evaluation Boards dated 10 June 2004. This was a document prepared jointly between the JAA, the FAA and transport Canada. At the time of preparation Level A and B FFS devices were not available and the document did not recognise their capability. Since then there have been a number of Level B devices built that are currently being used for type related training and checking. Appendix 9 to Part FCL recognises that Checking may be conducted in the aircraft or an FFS: it does not specify the level of the FFS. It would be	

			inappropriate for this document to mandate the level of FFS since it would not be consistent with Part FCL. **Justification:** Consistency and clarity **Proposed Text:** "(3) Level E currency When CTLC is permitted, any credit or constraints applicable to using ~~level C or D simulators~~ **FFS** are to be determined."	
31	B. DRAFT RULES — I. DRAFT DECISION ON CERTIFICATION SPECIFICATION AND GUIDANCE MATERIAL FOR OPERATIONAL SUITABILITY DATA (FLIGHT CREW DATA) — CS FCD BOOK 1 — SUBPART D OPERATIONAL EVALUATION	15 - 26	**Page No:** 25 **Paragraph No:** CS FCD 435 Evaluation process and evaluation descriptions, Paragraph (g), 4th sub-paragraph **Comment:** Include the use of aircraft as an alternative to simulators. **Justification:** Simulators are not always available and may not accurately represent the aircraft in the relevant area. **Proposed Text:** "Evaluation process: if level C or D training is appropriate, administer appropriate portions of a proficiency check in a level C or D simulator, **or aircraft**, as established by the Agency based on a proposal by the manufacturer."	
32	B. DRAFT RULES — II. DRAFT DECISION ON CERTIFICATION SPECIFICATION FOR OPERATIONAL SUITABILITY DATA (OSD) FLIGHT CREW DATA — CS FCD BOOK 2 — GM1 FCD.400 Operational evaluation process	34	**Page No:** 34 **Paragraph No:** GM1 FCD.400 Operational evaluation process, Paragraph (d) **Comment:** Change wording for 'optional equipment'. **Justification:** Wording for optional equipment should follow the same format as paragraphs (a), (b) and (c) for consistency. **Proposed Text:** "Optional equipment includes, but is not limited to: New aircraft technology or specific equipment such as HUD, EFB, NVIS, ECL customisation, EVS and SVS."	
33	B. DRAFT RULES — II. DRAFT DECISION ON CERTIFICATION SPECIFICATION FOR OPERATIONAL SUITABILITY DATA (OSD) FLIGHT CREW DATA — CS FCD BOOK 2	39 - 40	**Page No:** 39 **Paragraph No:** GM1 FCD.435 Evaluation process and evaluation descriptions, Paragraph (b) 2nd sub-paragraph **Comment:** Remove 'simulator' as part of the T2 evaluation involving the base aircraft. **Justification:** In previous evaluations, there have been unknown deficiencies in the simulator fidelity which have involved handling qualities. This does not allow an accurate	

	— GM1 FCD.435 Evaluation process and evaluation descriptions		comparison of handling qualities. **Proposed Text:** “T2 manoeuvres are flown in the base aircraft ~~or simulator~~ and in the candidate aircraft.”	

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