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Title	Update of flight simulation training devices requirements — Upset prevention and recovery training, FSTD inspector competencies framework, training matrix
NPA Number	NPA 2017-13

UK CAA (European.Affairs@caa.co.uk) has placed **34** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
17	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 18</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300 – Row 1.d.3</p> <p>Comment: There is no applicability on FNPT II or MCC for instrument indications responding appropriately to icing effects.</p> <p>Justification: , Row 2.t.2 on page 29 states that modelling that includes the effects of airframe and engine icing applies to FNPT II and MCC. This appears to be inconsistent with Row 1.d.3 on page 18.</p> <p>Proposed Text: Add FNPT II and MCC applicability to Row 1.d.3 on page 18.</p>	
18	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 18, 27, 28 & 74</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300 –Rows 1.d.3, 1.s.2, 1.t.1 and GM1 Appendix 9 to Part-FCL</p> <p>Comment: If a level B FFS is considered suitable for training, testing and checking licensing and OPs items, it is not understood why it should not be capable to demonstrate icing effects and flaps up stalling characteristics.</p> <p>Justification: GM1 Appendix 9 to Part-FCL (on page 74) shows level B FFS can support Type Rating Courses for SP and MP. It is questioned therefore, why does Appendix 1 to CS FSTD(A).300 state that a level B FFS is not suitable to support icing, upset or stall training.</p>	
19	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 21</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300, Row 1.g.2</p> <p>Comment: A 'stick pusher system' is a very specific term, other systems achieving the same effect are available. In terms of the CS, if the intent is to ensure that any system which impacts the longitudinal response of the aircraft on approach to stall be appropriately modelled, then a more generic term may be applicable.</p> <p>For example, Boeing term the system on the B737 as 'Elevator Feel Shift System', it is not a traditional stick pusher system.</p> <p>Justification: Appropriate terminology / clarity</p> <p>Proposed Text:</p>	

			<p>Amend Row 1.g.2, column headed 'Flight Simulation Training Device Standards' to read as follows:</p> <p>'For aeroplanes equipped with systems to modify the longitudinal control feel and/or position on approach to stall, control forces, displacement, and surface position of the aeroplane correspond to those of the aeroplane being simulated.'</p> <p>Amend Row 1.g.2, column headed 'Compliance' to read as follows:</p> <p>'A statement of compliance (SOC) is required verifying that the system has been modelled, programmed, and validated using the aeroplane manufacturer's design data or other acceptable data source. The SOC must address, at a minimum, the system activation and cancellation logic as well as system dynamics, control displacement and forces as a result of the system activation.'</p>	
20	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 22</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300, Row 1.h.2</p> <p>Comment: The 'COMPLIANCE' column states "<i>An SOC is required that defines the source data used to construct the FSTD validation envelope. Please refer to AMC11 FSTD(A).300</i>". We believe this is incorrect as AMC 11 appears to be concerned with the testing requirements AMC12 FSTD(A).300(b)(2) appears to define the Validated Envelope.</p> <p>Justification: Incorrect reference.</p>	
21	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 28</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300, Row 1.t.1</p> <p>Comment: The 'COMPLIANCE' column states "<i>Please refer to AMC12 FSTD(A).300</i>". AMC13 FSTD(A).300 would appear to be more applicable.</p> <p>Justification: Incorrect reference.</p>	
22	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 29 (new amendment to current FSTD document to be added)</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300, Row 1.(v)(1)</p> <p>Comment: We believe consideration should also be given to include the effects of ice on the mass properties including the airplane mass, centre of gravity and moments of inertia and have therefore proposed an additional amendment to Row 1.(v)(i) in the current FSTD document.</p> <p>Justification: The accretion of ice also increases the overall mass and can move the cg resulting in further handling issues.</p> <p>Proposed Text: Add additional amendment to text in first column in Row 1.(v)(i) in current FSTD document as follows:</p> <p>"... be implemented as a function of payload, fuel loading and ice accreted."</p>	

23	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 29</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300, Row 2.a.1</p> <p>Comment: The 'COMPLIANCE' column states '<i>....specific emphasis has to be placed on tuning out objectionable motion system responses</i>'</p> <p>It is not clear who/ how it is determined what is objectionable. Motion responses will always be unrepresentative and violent during aggressive handling inputs, such as may be required during UPRT.</p> <p>Justification: Appropriateness/clarity</p> <p>Proposed Text: Amend to read as follows: '<i>.... specific emphasis <u>should be</u> placed on tuning out objectionable motion system responses <u>where possible</u></i>'.</p>
24	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.1. CS-FSTD(A) — Book 1	15 - 32	<p>Page No: 30</p> <p>Paragraph No: Appendix 1 to CS FSTD(A).300, Row 2.d.1</p> <p>Comment: It is unclear whether the 'COMPLIANCE' statement: "<i>If there are known flight conditions where buffet is the first indication of the stall, or where no stall buffet occurs, this characteristic should be included in the model.</i>" only applies to Level A devices.</p> <p>If not, we believe this sentence should be placed ahead of the Level A sentence. Alternatively, given that the requirement, in Row d.1.(6), already contains the text "(where applicable)", this could be deleted.</p> <p>Justification: Clarity</p>
25	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 34</p> <p>Paragraph No: AMC1 FSTD(A).200, paragraph 3.1.2 (b)</p> <p>Comment: We believe the meaning for MMO is incorrect and propose that the ICAO definition should be used.</p> <p>Justification: Appropriate terminology.</p> <p>Proposed Text: Amend to read: 'MMO – Maximum Mach Operating Speed'</p>
26	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 34</p> <p>Paragraph No: AMC1 FSTD(A).200, paragraph 3.1.2 (b)</p> <p>Comment: We believe the meaning for VMO is incorrect and propose that the ICAO definition should be used.</p> <p>Justification: Appropriate terminology.</p> <p>Proposed Text: Amend to read: 'VMO – Maximum Operating Speed'</p>
27	3. Proposed	33 -	<p>Page No: 37</p>

	amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	72	<p>Paragraph No: AMC1 FSTD(A).300, Test 2.a.(10)</p> <p>Comment: Test 2.a.(10) states '<i>Stick pusher system force calibration (if applicable)</i>' However, other systems need to be considered.</p> <p>For example, Boeing term the system on the B737 as 'Elevator Feel Shift System', it is not a traditional stick pusher system. Were this system to be tested on ground as suggested there would be no effect on the column, it would have to have the column displaced from neutral for any effect.</p> <p>Justification: Appropriate terminology / clarity.</p> <p>Proposed Text: Amend Test 2.a.(10) to read: 'Longitudinal Control Stall (if applicable)'.</p>	
28	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 37</p> <p>Paragraph No: AMC1 FSTD(A).300, Test 2.a.(10), Notes column</p> <p>Comment: It is not clear how this may be validated or whether a computed force is to be allowable We believe a real force measurement (e.g. Fokker style) will be very problematic.</p> <p>Justification: The instantaneous, dynamic nature of a Stick Pusher system could cause problems in accurately measuring the column force that it generates.</p>	
29	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 41</p> <p>Paragraph No: AMC1 FSTD(A).300, Test 2.(c).(8a)</p> <p>Comment: The flaps up 'stall area' at lower altitudes as well as the cruise has been found to be lacking on numerous occasions by the UK CAA in the past, we recommend that it is also tested at the lower altitudes as well</p> <p>Justification: Safety.</p>	
30	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 42 and 43</p> <p>Paragraph No: AMC1 FSTD(A).300, Test 2.c.(8a)</p> <p>Comment: There are two statements in the COMPLIANCE column where the wording is not clear and its meaning is not fully understood, as follows:</p> <ol style="list-style-type: none"> 1. <i>".... In these circumstances, it is adequate to complete the test until the envelope protection is cancelled".</i> 2. <i>".... and the modelling beyond the stall angle of attack is limited to continuity and completion of recovery".</i> <p>Justification: Clarity requested.</p>	
31	3. Proposed	33 -	Page No: 42 and 59	

	amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	72	<p>Paragraph No: AMC1 FSTD(A).300 Test 2.c.(8a) and AMC9 FSTD(A).300(b)(1)(xii)</p> <p>Comment: We believe it may be helpful to clarify that this test is only required if full stall training privileges are sought.</p> <p>Justification: This test is only required for FSTDs qualified to conduct full-stall training tasks, ref FSTD(A).300(b)(1)(xii)</p> <p>Proposed Text: Amend as follows:</p> <p>Change test name to (8a) “Stall characteristics (if applicable)” and include in COMMENTS column: “This test is only for FSTDs qualified to conduct full-stall training tasks”.</p> <p>Move AMC9 FSTD(A).300(b)(1)(xii) to AMC9 FSTD(A).300(b)(1)(i) so that it is the first statement that is read.</p>
32	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 46</p> <p>Paragraph No: AMC1 FSTD(A).300 Test 2.i.(1)</p> <p>Comment: The test tolerances state “<i>but not less than aeroplane performance data</i>”. If the intention is that this should be compared with published airplane minimum performance data from the AFM it should state as such to be consistent with other tests.</p> <p>Justification: Alignment with other tests, , e.g. 1.c(2)</p> <p>Proposed Text: Change: “but not less than aeroplane performance data.” to “but not less than applicable AFM data”.</p>
33	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 48</p> <p>Paragraph No: AMC1 FSTD(A).300 Test 3.g.(6)</p> <p>Comment: The text in the COMMENTS column: “... <i>for those aeroplanes which exhibit stall buffet before the activation of the stall-warning system.</i>” needs clarification on the difference between this case test and 3.g.(5) in the current FSTD document– Approach to Stall buffet. It is not clear what the difference between these two tests would be.</p> <p>Test 3.g.(6) implies that approach to stall buffet checking is required for a level C FFS, but 3.g.(5) implies that it is not. We believe that 3.g(5) in the current FSTD document should also be subject to the same amendment to address this inconsistency.</p> <p>Justification: Clarification</p>
34	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 52</p> <p>Paragraph No: AMC1 FSTD(A).300 Test 3.n.(6)</p> <p>Comment: We believe the Note appears to be misplaced for a Subjective section. The content is more Objective based.</p> <p>Justification: Validation of this requirement will be more through Objective testing.</p>

	2		
35	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 53</p> <p>Paragraph No: AMC1 FSTD(A).300 Test 3.p.(2)(a)</p> <p>Comment: We believe the reference at the foot of the page in column 1 is incorrect.</p> <p>Justification: The reference quoted should be AMC13 FSTD(A).300.</p> <p>Proposed Text: Amend to read: “Please refer to AMC13 FSTD(A).300.”</p>
36	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 56</p> <p>Paragraph No: AMC9 FSTD(A).300 ,sub-paragraph (a)(1)(i)(B)</p> <p>Comment: With regard to the statement ‘<i>have first-hand experience in recovering upset situations on a real aeroplane;</i>’, it is not understood whether this must be on the FSTD type being tested or on any aeroplane type</p> <p>Justification: Clarity required.</p>
37	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 57</p> <p>Paragraph No: AMC9 FSTD(A).300.(a)(3)(i)</p> <p>Comment: Use of the word “contiguous” is not considered the best term.</p> <p>Justification: It may not make sense to non-primary English speakers</p> <p>Proposed Text: Amend to read as follows:</p> <p>“...the model should remain useable, without any apparent discontinuities, beyond the FSTD training envelope....”</p>
38	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 57</p> <p>Paragraph No: AMC9 FSTD(A).300.(a)(4)(ii)</p> <p>Comment: The text appears to be two requirements in one line and we believe should be separated..</p> <p>Justification: Two separate stages of the stall are referenced together.</p> <p>Proposed Text: Amend to read:</p> <p>“(ii) degradation in control response (pitch, roll, yaw). (iii) uncommanded roll response or roll-off requiring significant control deflection to counter”</p> <p>Then all lines following to be renumbered</p>
39	3. Proposed amendments	33 - 72	<p>Page No: 59</p>

	and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2		<p>Paragraph No: AMC9 FSTD(A).300(b)(3).</p> <p>Comment: The formatting of this paragraph is not in line with the previous paragraph</p> <p>Justification: Consistency of formatting.</p> <p>Proposed Text: Align paragraph (3)(i) through ((iv) with previous section.</p>	
40	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 59</p> <p>Paragraph No: AMC9 FSTD(A).300.(b)(3)(i)</p> <p>Comment: The wording in the first sentence is not fully understood. Confirmation is requested that time histories to <u>full stall</u> due to icing accretion are required and not just to stall speed. This is not referenced anywhere else. In fact, page 28 Row 1.t.1, states that any stall protection system “....must respond properly to ice accretion....”, so it is unclear what is required if the aircraft does not stall under icing conditions</p> <p>Justification: Clarity requested.</p>	
41	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 62</p> <p>Paragraph No: AMC10 FSTD(A).300.(d)(2)(v)</p> <p>Comment: Stick Pusher is not mentioned. We believe explicit mention of Stick Pusher should be included.</p> <p>Justification: The Stick Pusher should be considered as part of the stall envelope protection system and, therefore, disabling it and/or suggested failures associated with it should also be included.</p>	
42	3. Proposed amendments and rationale in detail 3.1. Draft certification specifications (Draft EASA decision) 3.1.2. CS-FSTD(A) — Book 2	33 - 72	<p>Page No: 69</p> <p>Paragraph No: GM12 FSTD(A).300.(c)(1)(ii)</p> <p>Comment: We believe the list of parameters should be more specific for flight control inputs.</p> <p>Justification: AMC 12 FSTD(A).300.(c).(1).(ii) states that cockpit control forces, and flight control law for fly by wire aeroplanes, must be part of the feedback data in the mechanism available to instructors. The new GM mentions “Time history of control inputs” only.</p> <p>Proposed Text: Amend as follows:</p> <p>Replace ‘Time history of control inputs’ with the following: “Time history of control inputs, including cockpit control forces and flight control law (fly by wire aircraft), as applicable.”</p>	
43	3. Proposed amendments and rationale in detail 3.2.	73 - 84	<p>Page No: 73</p> <p>Paragraph No: GM1 Appendix 9 to Part-FCL</p>	

	Draft AMC/GM (Draft EASA decision) 3.2.1. AMC/GM to Part-FCL		<p>Comment: The new GM appears not to recognise the significance and importance of dual-qualified level B FFS/ FDT3 devices , CS FCD recognises such dual qualification. The Table might usefully recognise level B FFS devices with motion.</p> <p>We question whether the distinction between FS and FTD in terms of the balance of training to be conducted in helicopter and training devices (2:10 or 4:8) is appropriate when FTD 2 and 3 devices may be included under the 'FTD' classification. Whereas MP(H) to MP(H) provisions recognise FTD 2 and 3 but not FFS levels A or B.</p> <p>It is suggested that this is reviewed and / or omitting the table is considered.</p> <p>Justification: Developments in modern helicopters seem not to have been taken fully into account.</p>	
44	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA decision) 3.2.1. AMC/GM to Part-FCL	73 - 84	<p>Page No: 73</p> <p>Paragraph No: GM1 Appendix 9 to Part-FCL – Training Credits for FTD1</p> <p>Comment: FTD1 is not considered suitable for any form of instrument instruction / training. Clarification is requested on the rationale for this.</p> <p>Justification: The capabilities of FTD1 devices are considered sufficient to support at least some degree of instrument instruction / training.</p>	
45	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA decision) 3.2.1. AMC/GM to Part-FCL	73 - 84	<p>Page No: 73</p> <p>Paragraph No: GM1 Appendix 9 to Part-FCL – MPL integrated, Phase 3</p> <p>Comment: The FSTD requirements for Phase 3 MPL are unclear.</p> <p>The text for Phase 3 MPL indicates that training is possible on a level B FFS, and also references Part-FCL, Appendix 5 to Annex 1, where there is a table "MPL Training Scheme". This table confirms the FSTD requirements for Phase 3 MPL and includes the text "<i>.... equivalent standard to level B + ATC simulation...</i>"</p> <p>Clarification on the following is requested:</p> <p>What does "equivalent standard to level B" mean ? Where are the requirements for ATC simulation stipulated ? In the JAA era, there was an additional requirement for an enhanced visual system if a level B FFS was used for this purpose. Is this now no longer required ?</p> <p>Justification: Clarification required on the above questions</p>	
46	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA	84 - 95	<p>Page No: 85</p> <p>Paragraph No: GM1 ARA.FSTD.101(a), sub-paragraph (b)</p> <p>Comment: We believe the reference quoted is incorrect.</p>	

	decision) 3.2.2. AMC/GM to Part-ARA		<p>Justification: Correct reference</p> <p>Proposed Text: Amend to read: "Please refer to GM2 ARA.FSTD.101(a) for further guidance...."</p>	
47	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA decision) 3.2.2. AMC/GM to Part-ARA	84 - 95	<p>Page No: 86-88</p> <p>Paragraph No: GM1 ARA.FSTD.101(a) Table 1</p> <p>Comment: Competencies defined for TI conducting Recurrent evaluations are generally "W" - working level, which we believe is too low.</p> <p>Justification: A recurrent evaluation can often involve reviewing FSTD updates or changes made since the previous evaluation. A degree of expertise equivalent to that needed for an initial evaluation may be required to confidently assess these. Therefore, the competency level should be the same for a recurrent evaluation as for an initial evaluation (i.e. "E" - expertise) for most of the elements listed as "W".</p> <p>By reviewing the definition of "E" on page 85, it can be seen that these requirements, certainly (i) and (ii), are essential also for a recurrent evaluation.</p> <p>It is recommended that the Recurrent evaluation minimum competency levels should be reviewed.</p>	
48	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA decision) 3.2.2. AMC/GM to Part-ARA	84 - 95	<p>Page No: 88</p> <p>Paragraph No: GM2 ARA.FSTD.101(a) , sub-paragraph (a)(3)(i)</p> <p>Comment: We believe the new regulation fails to recognise that there are insufficient Helicopter flight simulators around the globe for any Inspector to retain currency on evaluation tasks. There are only 20 or so FFSs around the globe. Since many are now EASA-tasked, doing the absolute minimum number of FFS evaluations would only need 8 or so Inspectors from around Europe. With the UK CAA now investing in up to 6 FOTIs (Flight Operations Training Inspectors) it is difficult to see how the proposals will enable inspectors to remain current and thus qualified to conduct FFS evaluations if the rule is adopted.</p> <p>We therefore suggest that this proposed paragraph is deleted.</p> <p>Justification: The current text of AMC4.ARA.FSTD.100(a)(1), Initial evaluation procedure, does not require a flight Inspector to hold an instructor rating, stating only that individuals must be qualified in 'flight crew training procedures'. This is vague and may result in people lacking appropriate experience and skills.</p>	
49	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA decision) 3.2.2. AMC/GM to Part-ARA	84 - 95	<p>Page No: 88</p> <p>Paragraph No: GM2 ARA.FSTD.101(a), sub-paragraph(a)(3)(i)</p> <p>Comment: Notwithstanding the UK CAA's previous comment on this sub-paragraph, we believe the use of the term "privilege" is imprecise and should be replaced by something more distinct such as</p>	

			<p>'rating' as used in the next section, GM2 ARA.FSTD.101(a).(3).(ii).</p> <p>Justification: Clearer terminology.</p> <p>Proposed Text: Amend to read: "if the flight inspectors instructor rating has expired more than...."</p>	
50	3. Proposed amendments and rationale in detail 3.2. Draft AMC/GM (Draft EASA decision) 3.2.2. AMC/GM to Part-ARA	84 - 95	<p>Page No: 89</p> <p>Paragraph No: GM2 ARA.FSTD.101(a), sub-paragraph (c)(3)</p> <p>Comment: We believe use of the word "pedagogic" is overly complex, it is not generally used in the English language and will potentially confuse non-primary English speakers.</p> <p>Justification: Clarity and understanding.</p> <p>Proposed Text: Amend to read: "(3) adequate teaching skills".</p>	