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NPA 2020-15

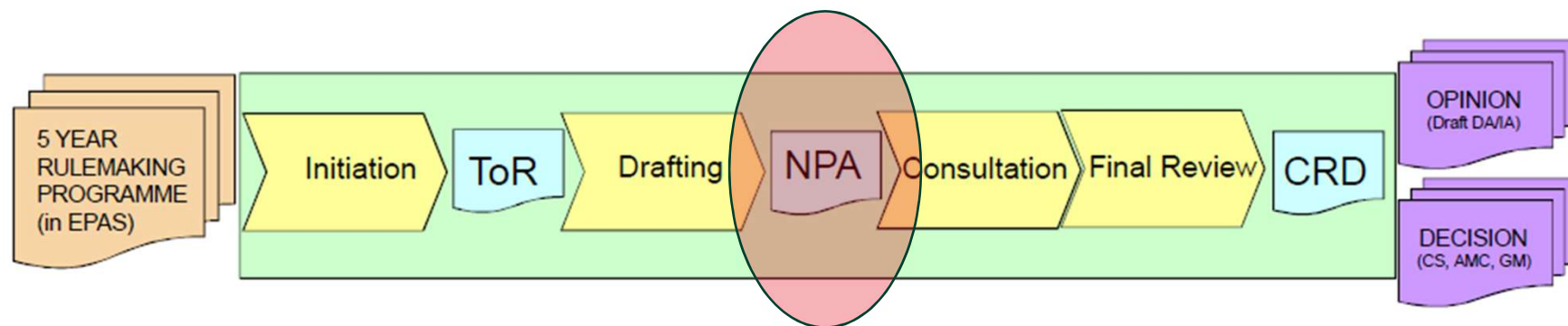
Update of the flight simulation training device requirements

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 - Options
 - Questions aux ATO et opérateurs FSTD sur l'impact économique

Rappels sur processus NPA

CRD: Comment Response Document
MAB: Member States Advisory Body
NPA: Notice of Proposed Amendment
PIA: Preliminary Impact Assessment
RAG: Rulemaking Advisory Group
RIA: Regulatory Impact Assessment
EPAS: European Plan for Aviation Safety
SAB: Stakeholders Advisory Body
STeBs: Stakeholder Technical Bodies
TeBs: Technical Bodies
ToR: Terms of Reference
EDA: European Defence Agency



Rappels sur processus NPA

NPA (Notice of Proposed Amendment)

- Projet d'amendement à un règlement européen
- S'inscrit dans l'avancement d'un groupe de travail de l'AESA
- Consultation publique ouverte à tous (autorité, opérateurs, organismes, toutes les parties intéressées)
- Possibilité de commenter directement en ligne
- Atelier Agence en webex suite à la NPA ?

NPA 2020-15

NPA (Notice of Proposed Amendment)

➤ **Projet d'amendement**

- **Règlement (UE) 1178/2011**

- ✓ Part ARA et AMC/GM
- ✓ Part ORA et AMC/GM
- ✓ AMC/GM Part FCL (appendice 9)

- **CS FSTD**

➤ **Groupe de travail AESA**

- **RMT.0196**

➤ **Parties intéressés**

- | | |
|--------------------------|-----------------------------|
| ▪ ATO | ▪ FSTD data provider |
| ▪ Opérateurs FSTD | ▪ Opérateur |
| ▪ Fabricants FSTD | ▪ Autorité |

NPA 2020-15

☐ Calendrier

in accordance with
Articles 6(3), 7 and 8 (Standard procedure: public consultation) of MB Decision
No 18-2015

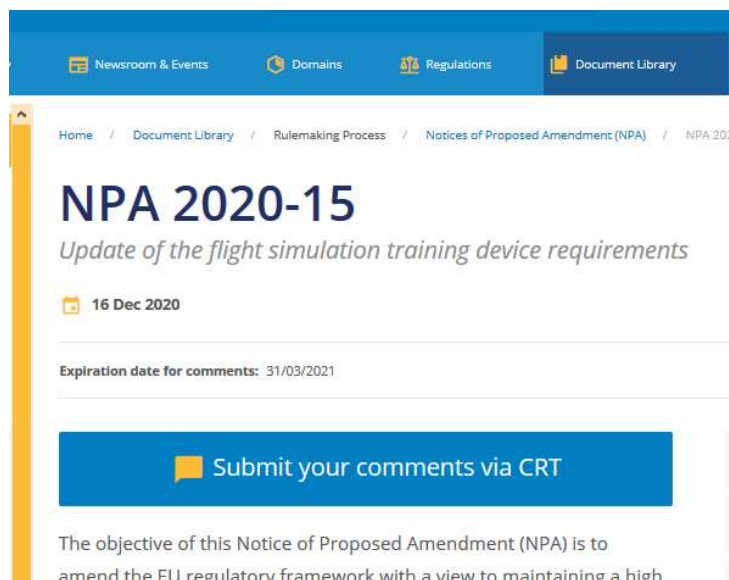
Date limite consultation NPA: 31 mars



Commenter via l'outil CRT

❑ Accès à l'outil

<http://hub.easa.europa.eu/crt/>



Favoriser Chrome, Firefox ou Edge ; ne pas utiliser le mode privé.

Coordination réponse DSAC et industrie

- ☐ Présentation NPA et recueil des premiers commentaires
(**conférence du 26 janvier**)
- ☐ Recueil des commentaires externes via la boîte fonctionnelle pour
alimenter réflexion DSAC (**date limite envoi 5 mars**)
dsac-ers-pac-bf@aviation-civile.gouv.fr
- ☐ Envoi projet réponse DSAC (**semaine du 15 mars**) pour information
et éventuelle reprise dans vos réponses à la consultation

Etude impact (RIA)

❑ EASA Management Board decision n° 18-2015 of 15 December 2015

Article 5

Regulatory impact assessment (RIA)

1. Further to the PIA referred to in Article 3.4, a RIA shall be **part of the drafting of the rules**, with the objective to ensure that their content is based on evidence and sound analysis, and to assess the need for a performance-based approach.
2. The RIA shall be conducted based on the principle of proportionate analysis: in-depth analysis to be performed for rulemaking projects with expected high impact, and light analysis for rulemaking projects with expected lower impact.
3. The Agency's advisory bodies and the rulemaking group members (when a rulemaking group is set up) shall support the development of the RIA by providing economic and other quantitative data.

Etude impact (RIA)

☐ Evaluation de l'impact des objectifs de la NPA

- Apporter de la flexibilité dans le choix des outils (FSTD) pour répondre aux objectifs de formation (initial et recurrent)
- Faciliter le recours à de nouveaux outils (autres que les FFS)

Etude impact (RIA)

❑ Impacts (sécurité, social, économique, environnemental) des points suivants:

- (a) Support the matrix and methodology from ICAO Doc 9625 and the proposed changes by the TTF in the Implementing Regulation (Part-ARA and Part-ORA) and in CS-FSTD, and develop associated AMC and GM.
- (b) In the context of the matrix and methodology determine the use of other FSTDs for complex high-performance single-pilot aeroplanes type rating training and checking, when no FFS qualified in accordance with CS-FSTD exists for that type or is not readily available and/or accessible.
- (c) Explore and introduce ways of enabling the introduction of new technologies in training for the various aircraft categories (fixed wing and rotary wing).

Etude impact (RIA)

□ Options (1 option retenue et 2 options écartées)

Option 0	No policy change	Baseline option (no change to the existing CS-FSTD and FCL initial and recurrent type rating). There is insufficient utilisation of existing and future device capabilities due to the problems/issues explained above.
Option 1	FSTDs tailored to training needs	The options envisages that training providers identify the device capabilities — training tool ‘DNA¹⁸’ (referred to as FCS) — based on analysing training task objectives. The identified FCS is subsequently matched with a training tool available on the market having the same FCS. Apart from the new qualification certificate, an equipment and specifications list (ESL) will be issued for all existing FSTD for fixed and rotary wing. The latter will be provided and maintained by the organisation operating FSTDs. The ESL will be a stand-alone document separate from the FSTD qualification certificate and will provide information on the FSTD equipment and specifications.

By DNA, it is meant the concept of defining the level of fidelity of the device by using the FCS approach in assessing the device capabilities against fidelity features

Etude impact (RIA)

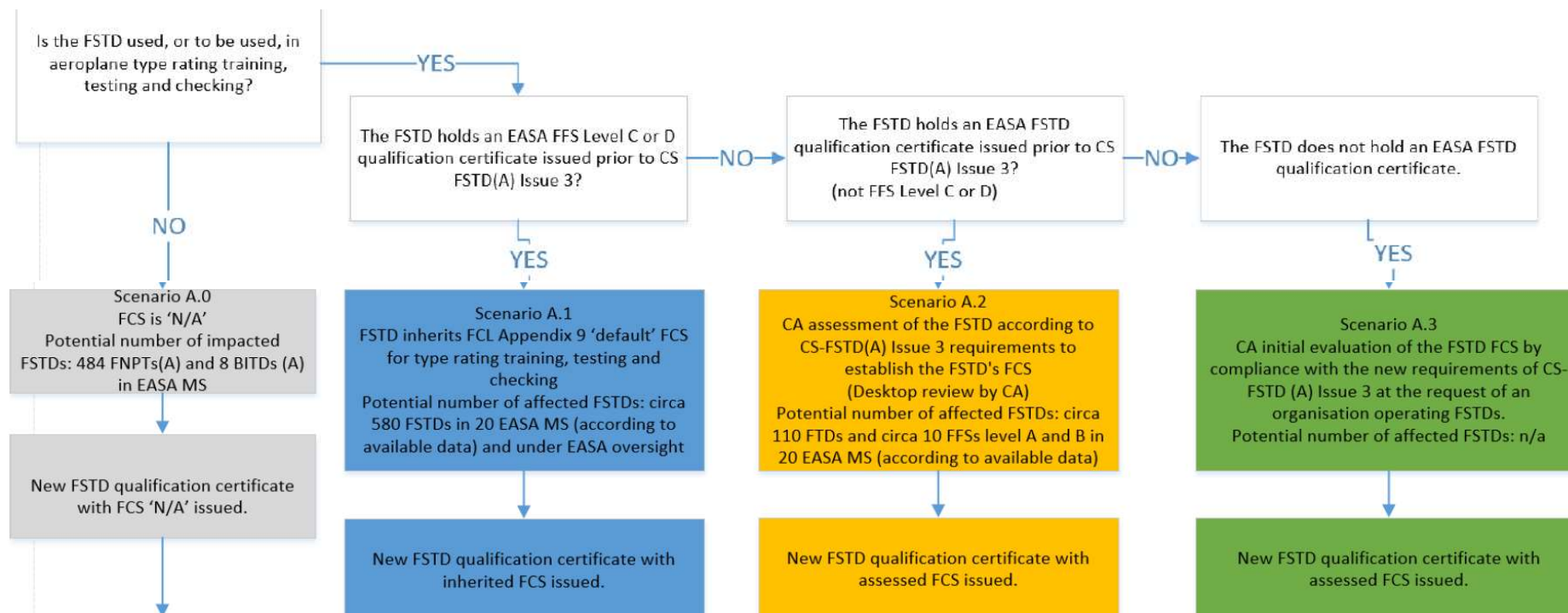
☐ Sécurité

<i>Criterion</i>	<i>Option 0</i> <i>No policy change</i>	<i>Option 1</i> <i>FSTDs tailored to training needs</i>
Safety	No impact 0 Neutral	Contribution to potential safety improvement due to correct usage of FSTDs to perform training tasks for type rating, and improved availability and access to FSTDs (especially for single-pilot high-performance complex aeroplanes) +2 Low positive impact

Etude impact (RIA)

□ Economique

➤ 4 scénarios/situations pour opérateurs FSTD



Etude impact (RIA)

□ Economique

➤ Basculement vers le concept FCS pour FSTD

FFS	D	D	For existing FSTDs: Retaining qualification level and adding default FCS (grandfathering)	Impact presented in Figure 5 Scenario A.1
			For new FSTDs: alignment with ICAO type VII	Impact presented in Figure 5 Scenario A.3
	C	-	For existing FSTDs: Retaining qualification level and adding default FCS (grandfathering)	Impact presented in Figure 5 Scenario A.1
	B	-	For existing FSTDs: re-evaluation of the capabilities of the FSTD and assignment of FCS	Impact presented in Figure 5 Scenario A.2
	A	-	For existing FSTDs: re-evaluation of the capabilities of the FSTD and assignment of FCS	Impact presented in Figure 5 Scenario A.2

Etude impact (RIA)

□ Economique

➤ Basculement vers le concept FCS pour FSTD

FSTD	-	B	For new FSTDs: alignment with ICAO type V	Impact presented in Figure 5 Scenario A.3
	1,2	A	For existing FSTDs: evaluation of the capabilities of the FSTD and assignment of FCS	Impact presented in Figure 5 Scenario A.2
			For new FSTDs: new type	Impact presented in Figure 5 Scenario A.3

Etude impact (RIA)

□ Economique

➤ Basculement vers le concept FCS pour FSTD

FNPT	-	E	For new FSTDs: alignment with ICAO type VI	Impact presented in Figure 5 Scenario A.3
	-	D	For new FSTDs: alignment with ICAO type IV	Impact presented in Figure 5 Scenario A.3
	-	C	For new FSTDs: alignment with ICAO type III	Impact presented in Figure 5 Scenario A.3
	-	B	For new FSTDs: alignment with ICAO type II	Impact presented in Figure 5 Scenario A.3
	-	A	For new FSTDs: alignment with ICAO type I	Impact presented in Figure 5 Scenario A.3

Etude impact (RIA)

❑ Economique

achieve the training objectives. The training providers that currently use other than FFS level C and D devices (e.g. FTD) in their approved training courses would be allowed to continue using them unless they change their courses. Only in the case of a (re-)approval of the course, the FCS of the FSTD must be used to check the suitability of the device.

All existing FSTDs would be accompanied by a new FSTD qualification certificate which would be issued at the next recurrent evaluation of the device. However, not all existing devices will have FCS (e.g. FNPT, BITD, FSTD helicopters will not currently have FCS in the FSTD certificate).

Etude impact (RIA)

□ Economique

➤ Questions ouvertes aux opérateurs FSTD

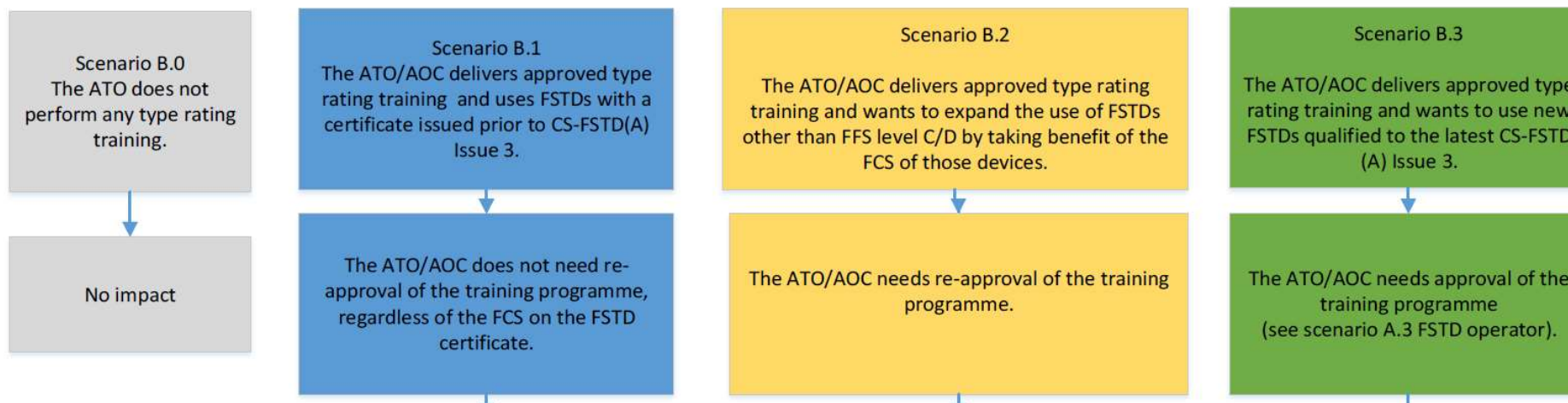
Questions to organisations operating FSTDs:

1. Organisations operating FSTDs are invited to comment on the economic impacts and estimated costs and their significance (low impact) for the different scenarios, explained above.
2. Organisations operating FSTDs that operate FNPTs are invited to confirm the expected cost increase to produce/operate a new FNPT according to CS-FSTD Issue 3 and to provide justification (scenario A.3).
3. Organisations operating FSTDs that operate FNPTs are invited to comment whether there would be any benefits from the implementation of scenario A.3 (e.g. a new FSTD is produced/operated according to the latest CS-FSTD Issue 3).

Etude impact (RIA)

□ Economique

➤ 4 scénarios/situations pour ATO



Etude impact (RIA)

□ Economique

➤ Questions ouvertes aux ATO

Questions to training organisations:

1. Training organisations are invited to share information about the expected costs to:
 - a) perform an analysis of the device capabilities needed to achieve the training objectives (Scenario B.2);
 - b) change their training programmes as a result of the analysis;
 - c) train their personnel on the new fidelity features and their application.
2. Training organisations are expected to comment on the assumption that these costs would be outweighed by the expected economic benefits.

Etude impact (RIA)

□ Synthèse RIA

Criteria	Option 0 No policy change	Option 1 FSTDs tailored to training needs	Score
Safety	0	Safety benefit due to full match of training with the device capabilities: effective and positive transfer of training	+2 low positive impact
Social	0	More effective type rating for the ATPL holders Some workload decrease for the CAs	+2 Low positive impact
Environmental	0	Environmental benefit as a result of using less energy for the FTD than for the FFS	+2 Low positive impact

Etude impact (RIA)

Economic	0	Benefits: - Fostering innovations and enabling savings (up to 20 %) in type rating training when using an FTD instead of an FFS - Improving availability and access to FSTDs other than FFSs (currently circa 110 FTDs and circa 10 FFSs level A and B exist) - Harmonisation with ICAO Doc 9625 Costs: - CAs (low negative impact): train inspectors, change qualification certificate, software change (circa EUR 50 000 per authority — one-off cost) and in total 1.6 M EUR for all EASA MS - Organisations operating FSTDs: - for existing devices, low negative impact (ca 1.2 Million EUR, depending on the type of FSTD they operate); - for new devices, produced according to CS-FSTD Issue 3, benefits are expected to outweigh the disbenefits (except for FNPTs where there would be no short-term benefits in terms of increase of training credits); - ATOs/airlines: perform analysis of the suitability of the device for the training tasks and objectives; - EASA: circa 300 working hours to explain the new paradigm (training, implementation support) Overall, it is a cost-effective proposal, balancing the costs and the benefits for the whole training FSTD system (except for existing and newly produced FNPTs in accordance with CS-FSTD Issue 3 where there would be no short-term benefits in terms of increase of training credits).	+2 low positive impact
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Etude impact (RIA)

□ Transition

In addition, the proposal should be well-presented and explained to the affected stakeholders by EASA by means of implementation support, promotion, workshops, etc. Hence, it is suggested that the transition period should be at least 12 months to support is proper implementation.

achieve the training objectives. The training providers that currently use other than FFS level C and D devices (e.g. FTD) in their approved training courses would be allowed to continue using them unless they change their courses. Only in the case of a (re-)approval of the course, the FCS of the FSTD must be used to check the suitability of the device.

All existing FSTDs would be accompanied by a new FSTD qualification certificate which would be issued at the next recurrent evaluation of the device. However, not all existing devices will have FCS (e.g. FNPT, BITD, FSTD helicopters will not currently have FCS in the FSTD certificate).



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QUESTIONS

❑ « Register » pour demander un mot de passe

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Une fois logué, ouvrir l'onglet « view document »

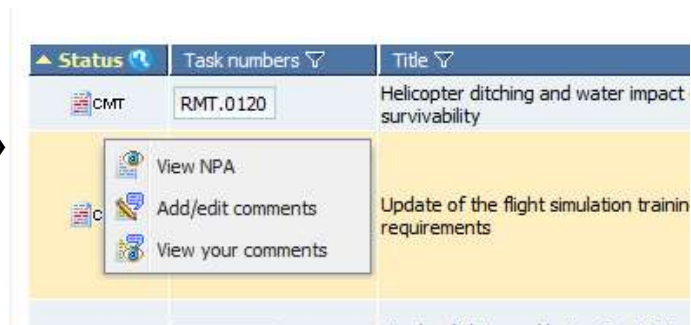
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right-click on any row for available actions Showing documents 1-10 from a total of 337 Show 10 documents per page Show only documents in status: (all)

1 2 3 4 5 ... > >>

▲ Status	Task numbers ▼	Title ▼	Number	Affected rules & codes ▼	Commenting / Reaction period (yyyy-mm-dd)	
					Begin	End
CMT	RMT.0120	Helicopter ditching and water impact occupant survivability	NPA 2020-16	CS-26 CS-27 CS-29 Part-26 CS-FSTD(A) Part-ARA	2020-12-23	2021-05-31
CMT	RMT.0196	Update of the flight simulation training device requirements	NPA 2020-15	Part-ARA AMC/GM Part-FCL Part-FCL AMC/GM Part-ORA Part-ORA AMC/GM	2020-12-16	2021-03-31
CMT	RMT.0678	Simpler, lighter and better Part-FCL requirements for general aviation (Subtask 2)	NPA 2020-14	Part-ARA Part-FCL Part-FCL AMC/GM Part-ORA AMC/GM	2020-12-14	2021-03-31

- Clic droit « Add/edit comments »



-Sélectionner la section à commenter et clic droit « Add comment »

European Union Aviation Safety Agency

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European Union Aviation Safety Agency NPA 2020-15
3. Proposed amendments and rationale in detail

The relevant PSTD feature (photo) level codes (N, B, R or S) can be found on the PSTD qualification certificate page 2 in the 'Fidelity level' column of the PSTD capability signature (PCS) table in Section H 'PSTD Feature' for each feature in turn.

The PSTD qualification certificate can be found in Appendix IV to Annex VI (Part-ARA).

3.2. Draft regulation (draft EASA opinion)

Draft text

Part-ARA

ARA.GEN.220 Record-keeping

(a) The competent authority shall establish a system of record-keeping providing for adequate storage, accessibility and reliable traceability of:

(1) the management system's documented policies and procedures;

(2) training, qualification and authorisation of its personnel;

(3) the allocation of tasks, covering the elements required by [ARA.GEN.205](#) as well as the details of tasks allocated;

(4) certification and declaration processes as well as oversight of certified and declared organisations;

(5) processes for issuing personnel licences, ratings, certificates and attestations and for the continuing oversight of the holders of those licences, ratings, certificates and attestations;

(6) processes for issuing PSTD qualification certificates and for the continuing oversight of the PSTD and of the organisation operating it;

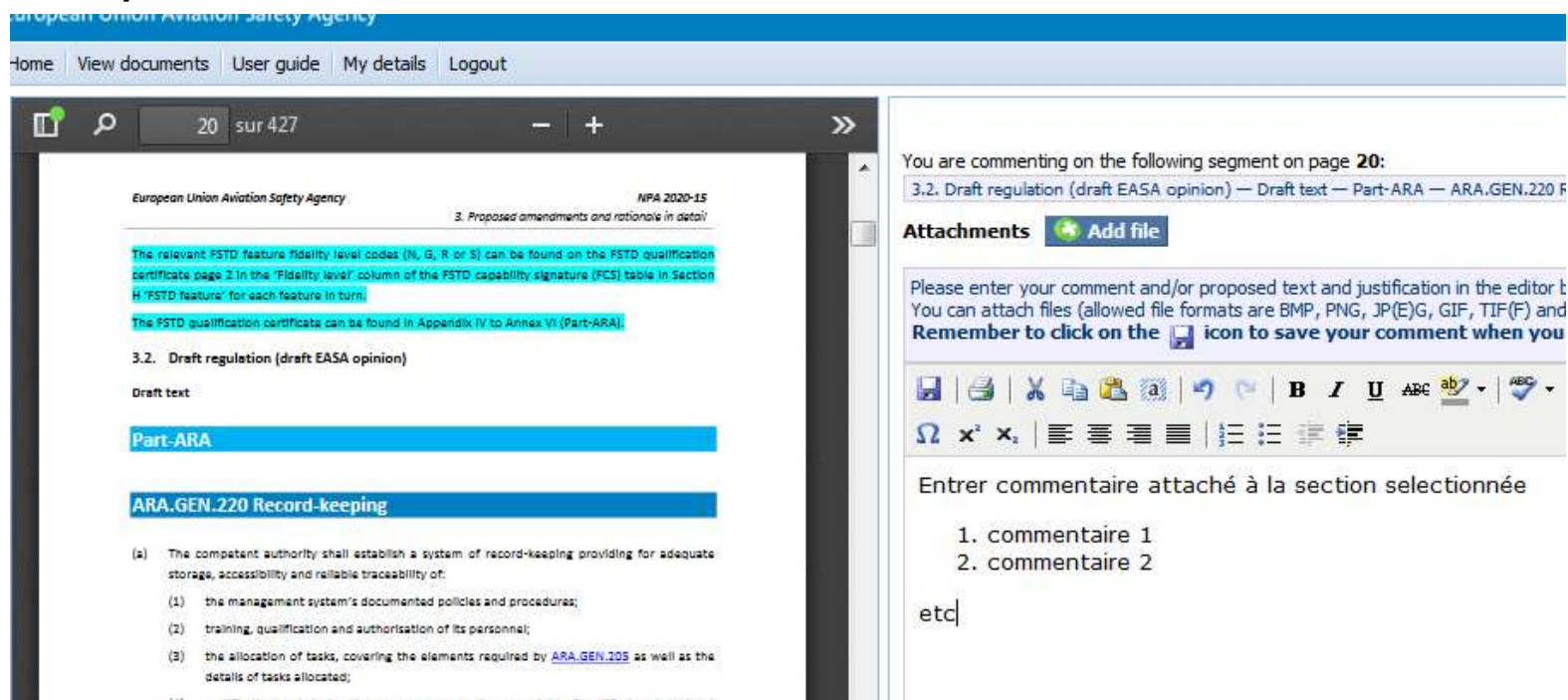
(7) oversight of persons and organisations exercising activities within the territory of the Member State, but overseen or certified by the competent authority of another Member State or the Agency, as agreed between these authorities;

(8) the evaluation and notification to the Agency of alternative means of compliance

Title Update of the flight simulation training d
NPA Number NPA 2020-15
You haven't placed any comments in this document. [View your](#)

Page	Description
-	(General Comments)
1	Title & Executive Summary
2	Table of contents
3 - 4	1. About this NPA
5 - 7	2. In summary—why and what, 2.1. Why we — issue/rationale, 2.2. What we want to ach
7 - 9	2.3. How we want to achieve it — overview (
9	2.4. What are the expected benefits and dra
10	3. Proposed amendments and rationale in d
10	3.1. Draft acceptable means of compliance a
11 - 18	AMC3 to Appendix 9 Training, skill test and p
19 - 20	GM2 to Appendix 9 Training, skill test and pr
20 - 21	3.2. Draft regulation (draft EASA opinion) — ARA.GEN.220 Record-keeping Add comment
21 - 22	ARA.FS.105 Certification procedure
22	ARA.FSTD.105 Certification specifications for
22	ARA.FSTD.110 Issue of an FSTD qualification
22 - 23	ARA.FSTD.115 Interim FSTD qualification

- Entrer manuellement les commentaires en regard de la section sélectionnée; sauvegarder.
Attention, la fonction Add File est moins lisible car les commentaires en pièce jointe ne figurent pas toujours sur le récapitulatif final de l'AESA.



The screenshot shows the EASA (European Union Aviation Safety Agency) comment submission interface. The top navigation bar includes links for Home, View documents, User guide, My details, and Logout. The main content area displays a document titled "NPA 2020-15" with the heading "3. Proposed amendments and rationale in detail". The document text is partially visible, showing sections for "Part-ARA" and "ARA.GEN.220 Record-keeping". On the right side, there is a comment submission form. It includes a section for "Attachments" with an "Add file" button. Below this, there is a text area for entering a comment, with a prompt: "Please enter your comment and/or proposed text and justification in the editor below. You can attach files (allowed file formats are BMP, PNG, JP(E)G, GIF, TIF(F) and Remember to click on the icon to save your comment when you are finished." The form also includes a rich text editor toolbar with various formatting options. At the bottom of the form, there is a section for "Entrer commentaire attaché à la section sélectionnée" with a list of comments and an "etc" option.

Relecture des commentaires : Dans l'onglet «View documents », clic droit sur la NPA considérée, et cliquer « view your comments »

Status	Task numbers	Title
CMT	RMT.0120	Helicopter ditching and water impact occupant survivability
CMT	RMT.0120	Update of the flight simulation training device requirements
CMT		Simpler, lighter and better Part-FCL requirements for general aviation (Subtas 2)
CMT		Regular update of CS-22

On obtient un nouvel onglet :

EASA

You can save this page as HTML and then open it in Microsoft Word for further editing.

Title	Update of the flight simulation training device requirements
NPA Number	NPA 2020-15

French DGAC (nadege.achard@aviation-civile.gouv.fr) has placed 1 unique comments on this NPA:

Cmt#	Segment description	Page	Comment
30	(General Comments)	0	TEST.

Page viewed on 2021-01-25 14:40:58 GMT

Page viewed on 2021-01-25 14:40:58 GMT

Pas de validation finale dans l'outil. Tous les commentaires entrés dans l'outil à la date limite de commentaires seront lus par l'AESA.