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|  <p>EASA European Union Aviation Safety Agency</p> | <p>Consultation paper</p> <p>Deviation to CS FCD.425(g) - Evaluation process – T3 test for level D difference training</p> | <p>Doc. No. : Dev-FCD.425-01</p> <p>Issue : 1</p> <p>Date : 06-May-2020</p> <p>Proposed <input type="checkbox"/> Final <input checked="" type="checkbox"/></p> <p>Deadline for comments: 28 May 2020</p> |
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SUBJECT : Evaluation process - T3 Test for level D difference training

REQUIREMENTS incl. Amdt. : CS FCD.425(g)

ASSOCIATED IM/MoC¹ : Yes / No [Delete last page of associated IM/MoC if not applicable]

ADVISORY MATERIAL : N/A

INTRODUCTORY NOTE:

Deviations shall be subject to public consultation in accordance with EASA Management Board decision 12/2007 dated 11 September 2007, Article 3 (2.) which states:

"2. Deviations from the applicable airworthiness codes, environmental protection certification specifications and/or acceptable means of compliance with Part 21, as well as important special conditions and equivalent safety findings, shall be submitted to the panel of experts and be subject to a public consultation of at least 3 weeks, except if they have been previously agreed and published in the Official Publication of the Agency. The final decision shall be published in the Official Publication of the Agency."

IDENTIFICATION OF ISSUE:

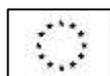
An applicant has submitted an application for the approval of an Avionics suite major design change introducing, amongst other updates, a new function *Required Navigation Performance Authorization Required Approach* (RNP AR APCH) down to 0.3 Nm plus as an optional activation of RNP AR APCH capability below 0.3 (down to 0.1 Nm).

This design change has an impact on Operational Suitability Data (OSD) Flight Crew Data (FCD). The upgraded software version introduces a maximum level B difference training compared to the previous version except for the new RNP AR APCH capability which requires a level D difference training.

Therefore, as per CS FCD.425(g), the proposed differences training for RNP AR APCH has to be evaluated by means of a T3 Test.

However, due to Covid-19, the scheduled T3 test had to be postponed and no new date can be set due to the uncertainty of the situation.

This deviation has been requested in a very specific and exceptional context which is due to COVID-19 crisis.



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Appendix A

Deviation to CS FCD.425(g)

T3 Evaluation process for level D difference training

1. APPLICABILITY

RNP AR APCH function down to 0.3 Nm plus as an optional activation of RNP AR APCH capability below 0.3 (down to 0.1 Nm).

1.1. AFFECTED CS

CS FCD.425(g) *Evaluation process and evaluation descriptions - Evaluation 3 (T3) states:*

...“Evaluation process: if level B training is appropriate, T3 may be completed by analysis. If level C or D training is appropriate, administer appropriate portions of a proficiency check in system or manoeuvre training devices or in an aircraft, as mentioned in CS FCD.415(a).”

1.2. PRE-CONDITIONS FOR APPLICATION OF THE DEVIATION

If the following pre-conditions are met, deviation to the evaluation process of CS FCD.425(g) may apply.

The introduction of the level D difference training:

- a. is on applicant’s request only,
- b. increases the safety level and would be otherwise not mandatory.

2. ESSENTIAL REQUIREMENTS OF REGULATION (EU) 2018/1139 TO BE COMPLIED WITH:

Annex II ANNEX II (Essential requirements for airworthiness)

...

2.1. The following must be shown to have been addressed to ensure safety for those on board or on the ground during the operation of the product:

(a) the kinds of operation for which the aircraft is approved must be established and limitations and information necessary for safe operation, including environmental limitations and performance, must be established;

...

Annex IV (Essential requirements for Aircrew)

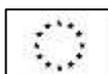
...

1.4. Practical skill

A pilot must acquire and maintain the practical skills as appropriate to exercise his or her functions on the aircraft. Such skills must be proportionate to the risks associated to the type of activity and must cover, if appropriate to the functions exercised on the aircraft, the following:

...

(h) operational procedures, including team skills and resource management, as appropriate to the type of operation, whether single or multi-crew;



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...

(j) abnormal and emergency operations, including simulated aircraft equipment malfunctions;

...

(l) aircraft type or class specific aspects;

(m) additional practical skill training that may be required to mitigate risks associated with specific activities; and

...

Annex V (Essential requirements for Air Operations)

...

8.1. The operation must not be undertaken unless the following conditions are met:

...

(b) the aircraft operator must use only suitably qualified and trained personnel and implement and maintain training and checking programmes for the crew members and other relevant personnel that are necessary to ensure the currency of their certificates, ratings and qualifications;

...

3. MITIGATING FACTORS

EASA has determined the following mitigating factors to ensure compliance with the essential requirements:

A comprehensive and broad analysis for the determination and justification of OSD FC data related to RNP AR APCH has to be conducted by a team of several specialists in the field including test pilots, operational pilots, customer support engineers, technical engineers, certifications engineers.

This analysis shall take into account:

- a. All flight and bench test results performed on real affected aircraft, and Flight Simulation Bench (FSB) where failures are triggered/simulated, including failures that are very improbable or impossible to perform on a real aircraft,
- b. RNP AR APCH OSD-FC data associated to a similar project already approved by EASA.

