

Consultation Paper
Equivalent Safety Finding

Doc. No.: ESF-FCD.425-01
Issue : 2
Date : 27 October 2021
Proposed ☐ Final ☒
Deadline for comments: 10 SEP 2021

SUBJECT : **CS-FCD T3 Evaluation Process**
REQUIREMENTS incl. Amdt. : **CS FCD.425(g) Initial Issue**
ASSOCIATED IM/MoC¹ : Yes ☐ / No ☒
ADVISORY MATERIAL :

INTRODUCTORY NOTE:

The following Equivalent Safety Finding (ESF) has been classified as important and as such 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:

CS FCD.425 defines the evaluation processes applicable to validate the Flight Crew Data (FCD). Six standard evaluations relying on the use of evaluation subjects are described. These evaluations are termed as "T-tests", numbered T1 to T6.

CS FCD.425 also defines the applicability of the T-test proportionally to the safety risk of the FCD project submitted for evaluation. FCD projects below the risk-threshold defined in CS FCD.425 may under certain conditions be completed by analysis without the involvement of test-subjects.

CS FCD.425(g) specifically deals with the T3 evaluation process, to evaluate differences between base and candidate aircraft and to set training and checking requirements. The difference training level of the project is used as a risk threshold. CS FCD.425(g) specifies that a T3 is needed to validate training requirements for difference training levels C or D.

Certain equipment may be fully identical on several aircraft types or variants from a pilot perspective: pilot interface, operational procedures and pilot perception of the equipment may be the same. If such equipment requires level C or D training, CS FCD.425(g) requires that a T3-test is performed for each aircraft type on which the equipment is installed in order to validate the FCD.

Considering all the above, the following Equivalent Safety Finding is proposed:

¹ In case of SC, the associated Interpretative Material and/or Means of Compliance may be published for awareness only and they are not subject to public consultation.

Equivalent Safety Finding to CS FCD.425 (g) Initial Issue**T3 Evaluation Process****1. Applicability**

This ESF to CS FCD.425(g) may be applied if

- type specific pilot training is required for the installation of the same equipment, system or functionality on more than one aircraft type of the same type certificate holder.
- the training differences levels associated with the installation of this equipment, system or function on a candidate aircraft are determined as level C or D in accordance with CS-FCD initial issue.

1.1 Affected CS

CS FCD.425(g)

2. Equivalent Safety Finding

In lieu of direct compliance to CS FCD.425(g), and provided that the below compensating factors are fulfilled, for the installation of the same equipment, system or functionality on an additional aircraft type or variant of the same type certificate holder, the validity of the T3 evaluation results for the basic aircraft may be extended to a variant of that aircraft type or to another aircraft type of the same applicant and training credits between types based on commonalities shall be granted, even if the appropriate level for training is determined as level C or D.

3. Compensating Factors

- a. The equipment, system or function installed on a variant of the same aircraft type or another aircraft type of the same type certificate holder shall:
 - be identical; and
 - have the same pilot interface; and
 - be operated according to the same procedures, under normal, abnormal and emergency operations; and
- b. The variant of the aircraft type or the other aircraft type from the same type certificate holder on which the equipment, system or function is installed has no influence on its functionality and the related perception by the pilot interface; and
- c. The proposed differences training and checking programmes and training devices are evaluated through a T3 evaluation in accordance with CS FCD.425(g) by the same type certificate holder; and
- d. An assessment is performed by the type certificate holder to check if a new T3 evaluation on the candidate aircraft could lead to a different result compared to the results from the original T3 evaluation performed in accordance with CS FCD.425(g).