

Appendix 3 — Summary of stakeholder comments on NPA 2024-108 and EASA responses to them

This document presents a summary of comments received on NPA 2024-108 and the response to them. These comments have been reviewed, assessed and, where applicable, addressed in the ED Decision.

Summary of comments	How they have been addressed in the Decision 2026/006/R
GM4 ARA.GEN.200(a)(2) - The GM refers to establishing the necessary competencies for FSTD inspectors. The table 1 with defined competencies and observable behaviour in FSTD domain may be conflicting with the upcoming changes in the ICAO framework for inspector's competencies. The table 2 of this GM with the training areas for initial training of FSTD inspectors was deemed to be unproportionate in terms of details. For some training areas it provides too much granularity, whereas other areas are with generic description.	Accepted. EASA has revised the approach in defining the framework for the training and qualification of FSTD inspectors. The qualification for the technical and flight inspectors is clarified by making reference to AMC2 ARA.FSTD.100(a);(b);(c). GM4 ARA.GEN.200(a)(2) introduces only training areas which the FSTD inspectors should cover in their training in order to develop and maintain the knowledge. In that way, the GM does not refer to competency-framework, but to expected training which the inspectors need to undergo in order to possess the knowledge and skills for their tasks. The scope of the initial training programme for FSTD inspectors is clarified in point (b)(8) of AMC2 ARA.GEN.200(a)(2). A detailed description of training areas which the competent authorities should cover during initial/recurrent training of FSTD inspectors is introduced with a dedicated table in GM4 ARA.GEN.200(a)(2).
AMC2 ARA.FSTD.100(a);(b);(c) - The qualification of technical inspectors in terms of education degree, i.e. aviation engineering degree or equivalent was unclear and very restrictive. Commenters expressed view that in many cases the FSTD technical inspectors have a background as "hands-on" aircraft technicians rather than posing degrees as aviation engineers. The text would limit the recruitment of FSTD-inspectors to only those with a degree in aviation	Accepted. The qualification of technical inspectors is no longer defined in terms of education degree (e.g. aviation engineering degree or equivalent was proposed in NPA 2024-108), but in terms of knowledge and experience the inspector should possess. This provides more flexibility for the authority when deciding on a flight inspector for an FSTD evaluation and follows the logic of AMC1 ORA.FSTD.225(b)) for the assigned person, responsible for the objective tests in case of extended recurrent evaluation period.



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engineering and this would unnecessarily exclude the aircraft technicians from the role of an FSTD-inspector.	
AMC2 ARA.FSTD.100(a);(b);(c) – It has been proposed that the AMC should specify as a criterion for recurrent training of the flight inspector, his/her recency in the type/class rating of the aircraft simulated.	This proposal has not been accepted, as the recency of the type/class rating of a flight inspector is not relevant, since the flight inspector does not act as a pilot flying the aircraft but as an evaluator of the FSTD. Furthermore, the flight inspector is always supported by a pilot from the organisation operating the FSTD (point (a) of AMC1 ORA.FSTD.100(a)).
AMC1 ARA.FSTD.100(a) – It has been requested that the AMC specifies the time length for the competent authority to complete and provide an evaluation report to the organisation operating the FSTD.	Noted. This cannot be specified due to the lack of a legal time frame for completion of an evaluation report in point ARA.FSTD. 100(d), as amended by Implementing Regulation (EU) 2026/781. In addition, it is difficult to standardise the period for the initial evaluation process and the delivery of an evaluation report, due to FSTDs with different complexity as well as different procedures by the competent authorities.
AMC1 ARA.FSTD.100(d) - The evaluation report does not account for roll-on roll-off device, there is no provision for the cockpit module model/part number and serial number.	Not accepted. The roll-on roll-off FSTD would have different serial numbers and FSTD qualification certificates and therefore there is no need to specify differently such devices in the evaluation report. In accordance with the amendments in Appendix IV to Annex VI (Part-ARA), the identification of each flight deck and platform shall be established by using serial number placards and each flight deck and platform combination shall have a qualification certificate with a single FSTD serial number that contains the identification/serial number of the flight deck and platform.



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AMC1 ARA.FSTD.100(d) - It has been requested that AMC clarified whether a limitation in the evaluation report results in a limitation being entered in the FSTD certificate.	Not accepted. It is at competent authority's discretion to decide how to address such situations on a case-by-case basis.
AMC1 ARA.FSTD.100(d) & GM1 ARA.FSTD.100(d) - The guidance on classification to A and B is good, but it is still abstract. For example, severity B refers to 'temporarily inoperative' systems. It may be difficult to separate severity B from A. It is proposed to add practical examples in order to harmonize the classification between the authorities.	Accepted. The definition of each item has been improved by specifying the criteria and the impact. The definition of the severity A item has been revised to ensure that it refers to non-compliance with the qualification basis which may adversely affect the training, testing and checking. Severity B items are classified as non-compliance related to the FSTD which does not meet the classification of the severity A. The related GM1 ARA.FSTD.100(d) is also revised to provide examples in support a demarcation of the items.
AMC1 ARA.FSTD.115 - In the context of interim qualifications it is more accurate to use the term 'data' as meaning both FSTD design data and FSTD validation data. The same terminology should be used throughout this AMC to ensure consistency and the correct emphasis.	Accepted. Amendments have been made in the text.
AMC1 ARA.FSTD.115 – A request was made to make a reference to CS-SIMD for new aircraft types.	Not accepted. Making such a reference is outside the scope of point ARA.FSTD.115 as amended by Implementing Regulation (EU) 2026/781 and consequently outside the scope of the AMC.
AMC1 ARA.FSTD.120 – It has been proposed that the timing for recurrent subjective testing in point (e) is retained to the existing text of 'around 4 hours' with the argument to maintain the total number of hours for recurrent evaluation.	Accepted. The text has been maintained unchanged. In addition, a new sentence has been added to point (e) of this AMC to clarify that additional time should be planned for recurrent subjective testing, if deemed necessary by the authority in cases in which an additional configuration is to be tested. This change, however, does not affect the total number of hours for the recurrent evaluation which



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	remains unchanged, unless there are additional configurations to be tested.
AMC1 ARA.FSTD.120 – It is proposed to add information about what happens to the FSTD qualification certificate if the recurrent evaluation is not performed before its deadline. The request was substantiated by different interpretation by the competent authorities on the consequences in such a case (e.g. some authorities consider that the qualification certificate is not valid anymore, others consider that it is a non-compliance of the authority with point ARA.FSTD.120, which however, does not affect the validity of the FSTD qualification certificate).	Not accepted. No clarification is necessary at AMC level, because the regulatory framework introduced with amending Regulation (EU) 2026/781 clarifies comprehensively the validity of an FSTD qualification certificate, including scenarios in which the competent authority is required to take enforcement measures.
AMC1 ARA.FSTD.130 – It has been proposed to add novelty of the major modification as a criterion for determination whether a special evaluation should be performed by the competent authority.	Accepted. The wording ‘novelty of the major modification’ has been included in point (a)(1). The determination that a major modification is novel could be driven by the use of new technology, new operations, new kind of installation, and use of new requirements / means of compliance.
GM1 ARA.FSTD.130 – The GM refers only to subjective testing when the aircraft systems are modified. It is important to mention also functions testing, because that is the test protocol for aircraft systems.	Accepted. A reference to functions and subjective testing has been added in point (b) to this GM, when fidelity levels of feature ‘Aircraft systems’ and ‘Flight deck layout and structure’ are modified.
AMC2 ORA.FSTD.100 – It has been requested that the existing AMC2 OPRA.FSTD.100 is maintained.	Not accepted due to the wide variety of metrics and lack of standardisation across the organisations operating the FSTDs which does not support the objective of regulating the performance metrics. The new AMC1 ORA.FSTD.100(d) defines a list of performance metrics for performance and use of FSTD. The



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	intention is to enable standardisation across the organisations operating FSTDs in EASA MS.
GM3 ORA.FSTD.100 - Paragraph (c)(3) mentions 'acceptance test manual' (ATM). This seems to be the only instance of 'acceptance test manual' (or ATM) in EASA regulations. Clearly, the ATM is different to the functions and subjective testing documentation. It is suggested to replace the words 'acceptance test manual' for example with 'any additional test documentation (typically known as acceptance test manuals) amending functions and subjective testing'.	Accepted. The wording has been added in point (c)(3).
GM3 ORA.FSTD.100 - This GM describes the contents of the dossier. It lists for example the list of open defects. However, the list of all the defects since the last evaluation (i.e. also those that have been closed) would be an important indicator of what kind of issues there have been identified. It is suggested adding a new text in point (d) with a list of all the reported defects since the last evaluation.	Accepted. The wording has been added in point (d)(10).
AMC1 ORA.FSTD.100(a)- There is no need to state that the pilot needs to be 'acceptable to the competent authority' when the criteria has been defined immediately prior, especially when there is no corresponding Part-ARA guidance to support the decision of acceptability. In addition, the term 'current flying experience' of the pilot remains ambiguous within industry, this should be clarified.	Accepted. The text has been modified to clarify that the personnel in support of an evaluation in point (a) is a pilot with a valid rating on the type or group of aircraft simulated, with sufficient knowledge and flying experience on such aircraft. The term 'current flying experience' of a pilot has been also deleted as it was open to different interpretations. The text 'acceptable by the authority', as proposed with NPA 2024-108, has been deleted in the final version, as it has been deemed impractical to introduce an additional layer of approval, since the qualification of the pilot was



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	clear.
AMC1 ORA.FSTD.100(b) - Remove point (b) or refer to point ORA.FSTD.120 to avoid duplication	Accepted. Point (b) of this AMC has been further modified to clarify that the procedure for management of an ESL should include a process/method(s) for verification and validation of the entries in the ESL. A reference to point ORA.FSTD.120 has been added. In parallel, the same text has been deleted in AMC1 ORA.FSTD.120, to avoid duplication.
GM1 ORA.FSTD.100 (c) - The level of focus in this GM on root cause analysis may be quite disproportionate when considering the overall safety impact of evaluation items. The GM should have some guidance added that acknowledges there are a variety of issues, therefore a variety of troubleshooting methods may be employed recognising that a root cause analysis may not be necessary, or even possible, in a number of situations.	Accepted. In point (d) it has been clarified that a root-cause analysis is one but not the only possible methodology to make an analysis of the non-compliance. The organisation can apply other appropriate methodologies to address the root cause of non-compliance.
AMC1 ORA.FSTD.100(d) & GM1 ORA.FSTD.100 (d) – Several comments requested full revision of the metrics proposed with NPA 2024-108. The stakeholders proposed new metrics (e.g. accomplished training time) or requested clarification on the proposed ones (e.g definition of support time). It has been proposed that a list of metrics is defined at AMC level, however with flexibility for organisations to tailor these metrics to their needs.	Partially accepted. The AMC defines a minimum set of metrics which the organisations should report to the competent authority, but it provides the organisation with a flexibility to develop additional metrics or additional information as necessary, tailored to its needs.
AMC1 ORA.FSTD.105(a)(1) – Clarifications and improvement of the text were requested on the	Accepted. In point (a)(1) the text related to the need for an organisation to ensure that all components are inspected



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following topics: In point (a)(1), the term 'components' was found ambiguous which can be interpreted as meaning motion, visual, control loading, software components, individual hardware components, etc. In point (a)(3), the last part of the sentence 'the operator should ensure that all critical systems of the FSTD are fully operational and capable of supporting the all the training scenarios planned for the day' does not make sense, it is not possible to know what kind of training is going to be performed. Point (b)(1) was deemed redundant, as the organisation should train its staff appropriately. In point (b)(5), the wording 'ensure' implies it actually needs to be tested every 24 hours. There is no need for a daily check, an annual check is sufficient as is required today. It is proposed to add a new section in the AMC to clarify what the organisation should do when an FSTD user reports a defect on the FSTD.	and tested has been deleted with the rationale that the term 'components' may lead to misinterpretation. New points (a)(4) and (b) has been added to illustrate the process the organisation operating the FSTD should follow when a discrepancy or a defect is detected. Point (c) is revised, simplified, and restructured to clarify that: • a pre-flight check should be performed by appropriately qualified personnel (point (c)(1)) which should be trained (point (c)(3)); • the organisation should keep detailed record keeping of the pre-flight check (point (c)(2)).
AMC1 ORA.FSTD.105(a)(2) – Concerns were raised that the AMC provided unnecessary details. Point (a)(1) referred to a very similar thing as to point (a)(2) and was deemed not needed. A request was made that more flexibility is provided to the organisation on the frequency of the objective tests. It has been proposed that the objective tests are run in a minimum of 4 equal parts and if organisations wish to run a monthly testing schedule, they should be free to do so. Current AMC also clarifies that motion,	Accepted. Points (a) and (b) have been revised to clarify that the organisation has the flexibility to decide on the frequency of the objective testing schedule. As a minimum, the testing should be conducted in four approximately equal parts. If the organisation so wishes, it can run a monthly testing schedule. It has been also clarified that the period for running the test is on an annual cycle. More flexibility is provided when defining the QTG test blocks (point (b)). Furthermore, it is specified that the tests may be grouped, when the test



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visual and sound tests are also spread throughout the testing schedule, and this should not be removed. The wording of 'previous 12 months' was not clear. It is proposed stating 'completed in the 12 month period that defines the recurrent qualification period'. It has been suggested adding a new item dedicated to clarifying the competencies of the staff of the organisation operating the FSTD to perform or approve objective tests.	requires special equipment. The proposal to explain the competencies of the staff performing/approving objective tests has been retained in the next iteration of the RMT.0196 working package 3 where the qualification of the personnel of the organisation operating the FSTD will be comprehensively addressed.
AMC1 ORA.FSTD.105(a)(3) – It has been proposed that the frequency of functions and subjective tests is not explained, but rather the minimum frequency in order to give operators flexibility. The checking of aircraft system malfunctions should be included in the functions and subjective tests and the AMC should clarify which and how the malfunctions are tested. A commenter proposed that the AMC defines the qualification of personnel responsible for conducting the functions and subjective tests.	Accepted. The text in point (a)(5) has been modified to provide more flexibility on defining the frequency of the functions and subjective tests. These tests can be divided into a minimum of four equal parts; however, the organisation may choose a different frequency. In addition, it has been clarified that each part covers tests from all sections of the functions and subjective table in the applicable qualification basis. New points (a)(6) and (b) are developed in response to the comments to specify the frequency for conducting simulated malfunctions during functions and subjective tests. The organisation samples malfunctions during the functions and subjective tests and analyses the impact of the malfunction on the affected features, systems, components, etc. As regards the proposal that the AMC explains the competencies of the staff performing/approving functions and subjective tests, it has been retained in the next iteration of the RMT.0196 working package 3 when the topic of the qualification of the personnel of the organisation operating the FSTD will be comprehensively addressed.



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AMC1 ORA.FSTD.105(a)(4) - A number of items were found unclear and suggested to be revised. In point (a) it should be made clear that this is for the FSTD hardware and software used for training. In point (a)(3) guidance is needed on what is really intended by adding 'firmware', e.g. LSAPS, or windows version on PCs etc. Additionally, there is no need to state 'installed databases' here when it is covered by point (c). It has been requested that AMC clarified the update of visual databases when an operating site represents a current real-world location, and a permanent significant change is made to that location.	Accepted. The introductory sentence to point (a) has been further modified to clarify that this AMC applies to the FSTD hardware and software used for training (not to FSTDs with development loads where changes/updates will not be tracked). Furthermore, it was requested to clarify the use of term 'firmware' in point (a)(2). In response, the rulemaking group shares the understanding that the use of the term 'firmware' in point (a)(3) refers to completeness of other sources of software that are not related to the main core operational software of the FSTD and all changes related to it should be tracked, including LSAPS, Windows version on PCs, etc. Point (d) is developed to address the comment on update of visual databases when an operating site represents a real-world location. In such cases, it is specified that an update to that model should be made in a reasonable time frame, providing flexibility for the organisation, depending on the timeline by a visual model manufacturer.
GM1 ORA.FSTD.110 – It has been proposed to add an example for a major modification 'any change affecting the FSTD qualification certificate'	Not accepted. This is included in point ORA.FSTD.110 as amended with Regulation (EU) 2026/781.
GM1 ORA.FSTD.110 – Some of the examples for major modification are very ambiguous and do not really provide much guidance, they can be interpreted such that just about any change on an FSTD could be considered major and this is not the intention here. The commenter suggested revising points (2)-(4) of point (a) of the GM.	Accepted. Points (a)(2)-(4) have been revised to provide clear guidance on the examples for major modification in line with the stakeholder's proposal.
AMC1 ORA.FSTD.110(a) – The text was criticized due to possible easy move of FSTD. Interpretations of 'when an FSTD is moved' vary	Accepted. The AMC has been further adapted to allow for more flexibility and proportionality, considering that, currently and in the future, FSTDs are more portable and



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greatly. Focussing on defining how much of the QTG should be run is an old way of thinking that has not changed. A new approach could be used that is more flexible, especially for smaller device that are more portable.	easily movable. The organisation should develop a proportionate testing plan according to the device and the nature of the move. The existing arrangement that the organisation should perform at least one third of the objective tests, functions and subjective tests is kept, however with the flexibility that it may be changed when agreed with the competent authority.
AMC1 ORA.FSTD.110(b)(2) – As regards the qualification and training of assigned personnel for internal acceptance of the modification, the text that such personnel ‘should have proven record of managing similar major modifications to the scope and complexity of the modification being undertaken’ is found ambiguous. Such training and proven record could have nothing to do with modifications and is proposed to be deleted. The text that the personnel assigned for internal acceptance of the modification should maintain its expertise is proposed to be deleted as such arrangement exists in ORA.GEN.210.	Accepted. Changes have been introduced.
AMC1 ORA.FSTD.110(c)(4) – The review of acceptance test results may take some time dependent upon the nature of the modification and the personnel involved. It is suggested that point (b) is changed to state 'not later than 3 days after the modification has been placed into training.'	Not accepted since some major modifications may require a change in the qualification certificate and, in such a case, the competent authority should be informed way before the modification is placed in training. Nevertheless, the timing has been changed to accommodate a concern raised by a stakeholder that, in some cases, the completion of the major modification does not end with the acceptance tests (e.g. in large updates of significant parts of the FSTD software and/or hardware there might be additional review after completion of the acceptance tests). The text has been further redrafted to specify that the triggering event for submission of the declaration of



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	compliance is once the modification is completed, and the final acceptance (not only the acceptance tests) is performed.
AMC1 ORA.FSTD.115 – Move the following text "The organisation operating the FSTD should provide users and instructors with safety instructions specific for each device" from GM1 ORA.FSTD.115 to AMC1 ORA.FSTD.115. The reasoning, according to the commenter, is that this is essential for safe FSTD operation, to ensure that all occupants receive appropriate safety instructions before using the device. There is no need to add applicability in point (b)(1) for 'the organisation operating the FSTD'. The 'organisation' means more than just people which is what this AMC is referring to. The operator's facility and emergency egress are covered under local health and safety legislation. This text needs to focus on egress of the FSTD occupants.	Accepted. In point (a)(1) a sentence has been included which is based on point (b) of GM1 ORA.FSTD.115. In point (b)(1) the reference to the organisation operating the FSTD has been removed.
GM2 ORA.FSTD.115 – The list of recommended safety features is found to be too specific, unproportionate to the scope and content of possible risks and scenarios that the organisation should consider. The language should be revised to illustrate what the expected safety features are.	Accepted. The GM has been redrafted to be less granular, but more concise and proportionate in terms of content. The language is revised to provide instructions and examples of recommended safety features for safe operation of the FSTD.
AMC2 ORA.FSTD.120 - The ESL does not account for roll-on roll-off device, there is no provision for the cockpit module model/part number and serial number. It is suggested that AMC clarifies this topic.	Not accepted. Such FSTDs have separate serial numbers and separate FSTD qualification certificates for each combination of flight deck and platform, and therefore the ESL should be completed for each FSTD certificate. This is a requirement in point ORA.FSTD.120 as amended by



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	Regulation (EU) 2026/781.
AMC2 ORA.FSTD.120 -The ESL template uses the words 'Primary Reference Document' and 'Secondary Reference Document'. The term 'Secondary Reference Document' is not established elsewhere and hence may be confusing. In addition, the ESL row referring to 'date of FSTD manufacture' is deemed vague (e.g. end of manufacturing at the factory or end of the installation at operator's premises, or end of the qualification)	Accepted. The box with reference to 'Primary reference document' has been changed to integrate the possibility that, when applicable, the FSTD can be identified with another reference document (e.g. secondary reference document). The year of manufacture is retained, but no further details other than the date of FSTD manufacturing have been deemed necessary.
AMC3 ORA.FSTD.120 – A commenter proposed that the AMC is converted to GM with the rationale that it is a guidance.	Not accepted. The instructions for ESL completion are kept at AMC level as they are the acceptable means of compliance with point ORA.FSTD.120, as amended by Regulation (EU) 2026/781. The intention is to standardise as far as possible the content of ESLs among organisation operating the FSTD and the Member States.
AMC3 ORA.FSTD.120 – Several editorial comments were made to the content of the instructions and to the form of the instructions.	Accepted. Based on the comments and internal review, the instructions have been developed in a form of a table instead of text.
AMC3 ORA.FSTD.120 – It has been proposed that the text regarding the charts not corresponding to the simulated nav aids is annotated with the text 'Not for flight training'.	Partially accepted. The text has been modified to clarify the intention. Charts which are not required to be updated (e.g. for nav aid what do not represent a real-world airports) can still be used in training but should be annotated for FSTD training use only. In addition, the text has been moved to AMC1 ORA.FSTD.105(a)(4) as it refers to the organisation's database management and not to the ESL.
AMC1 ORA.FSTD.200 - The box "General" in Part	Not accepted. It is not considered relevant to specify the



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A of the application form should be complemented with multi-crew operation in order to integrate the training and checking of multi-crew operations into the FSTD evaluation. In this configuration, the cockpit does not have to be equipped for a second pilot, which is a crucial difference.	type of operation in the application form. However, if the FSTD is to be qualified for MCC, this should be specified in the Part A of the application form.
AMC2 ORA.FSTD.200 – The AMC should clarify whether the organisation operating the FSTD may introduce changes to the FCS or ESL and if so, at what stage should it be possible.	Accepted. A new point (h) is added to clarify that the organisation operating the FSTD may introduce changes to the FCS or ESL, if applicable not later than the submission of Part B of the application form. The reasoning is that any change to ESL/FCS after the submission of Part B of the application form might alter significantly the evaluation process and therefore should not be allowed
AMC2 ORA.FSTD.200 – Performing only one third of the tests onsite for an initial evaluation is not deemed enough. As the device is dismantled for transport it is vital that all QTG are run by the operator after completed installation onsite. The commenter proposed removing the GM1 ORA.FSTD.200.	Accepted. A new point (k) has been added in AMC2 ORA.FSTD.200 regarding the possibility for the organisation operating the FSTD to run validation tests at the manufacturer's facility. The final text defines that the organisation should run all objective tests in the QTG at the final location of the FSTD, unless otherwise agreed with the competent authority.
AMC2 ORA.FSTD.225(b) – Point (a) (4) clarifies that an organisation operating the FSTD should provide to the competent authority the FSTD performance metrics for the previous 2 years. In commenter's view, there is no need to specify the text 'for previous 2 years', because this information is already provided to the authority with the dossier for recurrent evaluation every year.	Not accepted. The text is kept with the rationale that in some cases the competent authority may not be in a possession of these metrics (e.g. if the recurrent evaluation is performed by a service provider on its behalf) and therefore it should be retained.
AMC2 ORA.FSTD.225(b) – Point (b) clarifies that	Not accepted. The timing does not depend on the



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the dossier should be provided to the competent authority 14 days before performing the tasks under point ORA.FSTD.225(b). This is deemed as a constraint which may lead to incomplete dossier, considering that tasks under point ORA.FSTD.225(b) can be performed in the 60 days before and 30 days after the start of each recurrent 12-month period.	preparation for the extended evaluation period (EEP) tasks. The content of the dossier refers to activities performed in the previous 12 months. In addition, this change was not subject to the consultation with NPA 2024-108.
GM1 ORA.FSTD.225(b)(3) - An evaluation report template should not be provided when there is no actual requirement to perform an evaluation. It is proposed that template is either removed or clarified that the template may be used by operators if they wish to perform an evaluation internally in a manner similar to an evaluation performed by the competent authority.	Partially accepted. Point ORA.FSTD.225(b) requires that the assigned persons send a report with results of the tasks performed in accordance with point ORA.FSTD.225(b) to the competent authority. Therefore, there is a legal requirement for the development of a report. The GM illustrates a template for such a report. A new introductory sentence is added in GM1 ORA.FSTD.225(b)(3) to clarify the nature of the report for FSTD under extended evaluation period. The organisation may use the report to present the results of the tasks referred to in point ORA.FSTD.225(b). The content of the report is aligned with the content of the evaluation report (AMC1 ARA.FSTD.100(d)) due to the similarity between the activities performed during the recurrent evaluation of an FSTD and tasks for an FSTD under extended evaluation period.
GM1 ORA.FSTD.225(b)(3) - A commenter recommended alignment of the structure of the report in GM1 ORA.FSTD.225(b)(3) and its headings with the structure and headings of evaluation report as per AMC1 ARA.FSTD.100(d).	Accepted. The report structure and headings are aligned to the possible extent with those of the evaluation report as per AMC1 ARA.FSTD.100(d). The classification of discrepancies follows as far as possible the classification of items due to the similarity between the activities performed during the recurrent evaluation of an FSTD and tasks for an FSTD under extended evaluation period.

