



European Union Aviation Safety Agency
Comment-Response Document 2020-08

RELATED NPA: 2020-08 — RMT.0509 — 15.9.2021

Table of contents

1. Summary of the outcome of the consultation	2
2. Individual comments (and responses)	3
Appendix A — Attachments	72



1. Summary of the outcome of the consultation

A summary of the stakeholders' comments submitted to NPA 2020-08¹ is provided in the related Decision 2020/012/R.

In addition to this overview, all questions have been addressed individually in the second chapter of this document.

Some commenters requested EASA to reorganise the guidance material table linked to the applicability of CS FCD to reflect the required OSD elements for compliance demonstration (mandatory data and recommendations required from the TC holder). The elements that are part of the minimum syllabus for pilot type rating training were reviewed and include: Aircraft type designation and licence endorsement, aircraft variant designations, Training areas of special emphasis (TASE), Master Difference Requirement (MDR) tables between variants, Difference requirements (DR tables and Training footprints). Furthermore, other commenters proposed several suggestions related to the definition of TASE. The text was amended to reflect all the recommendations when appropriate. The guidance material developed explains the rationale of the TASE (when the identification of a TASE is needed), the types of TASE, its applicability and the typical elements that may generate a TASE.

Thirdly, a few commenters also required some changes to CS FCD.305 LIFUS (Line Flying Under Supervision). After having considered all the comments linked to include a minimum number of legs for LIFUS, this number remains open, leaving to the operator and the competent authority the decision to assess these criteria based on the requirements defined in Part-ORO. In addition, commenters requested EASA to clarify the criteria for the identification of an aircraft variant versus a new type or a modification of an existing type or variant. We have addressed these comments in the type rating evaluation process, and have also include a definition of 'variant' for the purposes of CS FCD.

Lastly, commenters requested EASA to clarify the classification of FSTDs associated with difference levels in 'training, checking and currency' to align it with the latest revision of CS-FSTD. We have taken all the comments on board and amended the text when appropriate.

¹ <https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2020-08>

2. Individual comments (and responses)

In responding to the comments, the following terminology has been applied to attest EASA's position:

- (a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — EASA either partially agrees with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the existing text is considered to be necessary.
- (d) **Not accepted** — The comment or proposed amendment is not agreed by EASA.

(General Comments)	-
---------------------------	---

comment	1	The LBA has no comments	comment by: <i>LBA</i>
response	Noted	Thank you for your feedback. It is noted.	

comment	7	<p><i>Piaggio Aerospace in A.S. is grateful for having the possibility to provide feedbacks to the NPA 2020-09.</i></p> <p><i>Our comments are detailed w.r.t. the relevant parts of the proposed text into the attached sheet: Piaggio comments are in inclined characters within yellow background. Piaggio feedback mainly asks to renew the possibility to use an actual aircraft during the training activity, possibility removed from the proposed text in total favor of the exclusive use of a FSTD.</i></p> <p><i>The rationale behind our request is relevant to the P180 current training organization, based upon the Piaggio ATO, located in Genoa, including the aircraft as training device, while the only FSTD available worldwide is located in USA, property of FSI.</i></p> <p><i>The P180 is Piaggio main and only product, a CS 23 single aircraft of limited size, weight and number of airplanes manufactured.</i></p> <p><i>The removal of the possibility to use the aircraft as a training device would create:</i></p> <p><i>- A significant burden to the "non USA" Operators obliged to cross the Ocean for any Pilots training activity</i></p>	comment by: <i>Piaggio Aero Industries s.p.a.</i>
---------	---	---	---



response - A significant annual invoicing reduction (economic damage) to Piaggio Aerospace in A.S. due to the impossibility to keep on offering Pilots training to the P180 Operators.

Noted.

Thank you for your contribution and justification given above. Please see our dedicated replies to your comments below in the corresponding parts of the CS.

comment 70 comment by: Boeing

[Attachment #1](#)

November 13, 2020

B-H020-REG-20-TDS-47

Note to file:
The attached comprise comments from The Boeing Company submitted to EASA via the Comment Response Tool (CRT) in response to EASA Notice of Proposed Amendment (NPA) 2020-08, Regular Update of Certification Specifications for OSD CS-FCD.

Sincerely,

Todd D. Sigler
Director, Global Safety & Regulatory Affairs

COMMENT # 1 of 10-			
Type of comment (check one)	Non-Concur	Substantive	Editorial
			X
Affected paragraph and page number	Page: 9 Paragraph: GM1 FCD.100 Applicability (a)(5)		
	<u>THE PROPOSED TEXT STATES:</u> (5) difference training provisions between variants within one type or between a variant or a type and related systems, equipment and procedures associated with an aircraft modification;		



What is your concern and what do you want changed in this paragraph?	REQUESTED CHANGE: Break into separate paragraphs – (5) difference training provisions between variants within one type; (6) difference training provisions between a variant or a types; (7) difference training provisions between related systems, equipment, and procedures associated with an aircraft modification;
Why is your suggested change justified?	JUSTIFICATION: To add clarity to the proposed text.

Partially accepted

Thank you for your contribution. Your comment is partially accepted and the text has been slightly modified to reflect it.

COMMENT # 2 of 10

Type of comment (check one)	Non-Concur	Substantive	Editorial
			X
Affected paragraph and page number	Page: 13 Paragraph: GM1 FCD.105 Definitions		
What is your concern and what do you want changed in this paragraph?	The PROPOSED TEXT STATES: N/A REQUESTED CHANGE: <i>The acronyms "TCH" and "ZFTT" are used in the NPA, but are not defined in the original document, nor in the NPA. Please add.</i>		
	Accepted Thank you for your contribution. Your comment is accepted.		

COMMENT #3 of 10

Type of comment (check one)	Non-Concur	Substantive	Editorial
			X
Affected paragraph and	Page: 13 Paragraph: GM1 FCD.105 Definitions		



page number	
What is your concern and what do you want changed in this paragraph?	<p><u>THE PROPOSED TEXT STATES:</u></p> <p>WBT Web-Based Training or Computer-Based Training</p> <p><u>REQUESTED CHANGE:</u></p> <p>CBT Computer-Based Training WBT Web-Based Training or Computer-Based Training</p>
Why is your suggested change justified?	<p><u>JUSTIFICATION:</u></p> <p>“CBT” is a commonly used acronym in the industry and should have a separate definition. Additionally, computer-based training does not need access to the internet in order to be performed.</p>

Accepted

Thank you for your contribution. Your comment is accepted.

COMMENT #4 of 10

Type of comment (check one)	Non-Concur	Substantive	Editorial
			X
Affected paragraph and page number	Page: 14 Paragraph: CS FCD.200 (c)		
What is your concern and what do you want changed in this paragraph?	<p><u>THE PROPOSED TEXT STATES:</u></p> <p>(c) The type rating or variant determination is recorded in the flight crew data.</p> <p><u>REQUESTED CHANGE:</u></p> <p>(c) The type rating or variant determination is recorded in the flight crew data Operational Suitability Data – Flight Crew document.</p>		
Why is your suggested change justified?	<p><u>JUSTIFICATION:</u></p> <p>To clarify where the flight crew data is found.</p>		
	Partially accepted		



Thank you for your contribution. Your comment is partially accepted. The text has been amended.			
COMMENT #5 of 10			
Type of comment (check one)	Non-Concur	Substantive	Editorial X
Affected paragraph and page number	Page: 14 Paragraph: GM1 FCD.200, fifth line from beginning of the paragraph		
What is your concern and what do you want changed in this paragraph?	<p>THE PROPOSED TEXT STATES: ...by including the OSD Flight Crew Specifications in the certification basis.</p> <p>REQUESTED CHANGE: Please clarify the meaning of "OSD Flight Crew Specifications." Are these specifications the certification specifications in the CS FCD?</p>		
Why is your suggested change justified?	<p>JUSTIFICATION: "OSD Flight Crew Specifications" is not clearly defined. Is the sentence saying the applicant must show or list the certification specifications (e.g. CS FCD.300, 310, 400, 425) they will comply to?</p> <p>Noted Thank you for your contribution. Your comment is noted. The 'OSD Flight Crew Specifications' are the CSs contained in CS-FCD.</p>		
COMMENT #6 of 10-			
Type of comment (check one)	Non-Concur	Substantive X	Editorial
Affected paragraph and page number	Page: 14 Para: GM1 FCD.200, eighth line from beginning of the paragraph		
	THE PROPOSED TEXT STATES:		



<p>What is your concern and what do you want changed in this paragraph?</p>	<p>With reference to CS FCD.200(d), when assessing changes for their impact on the FCD, a new model or series, as identified in the OSD flight crew report, would usually determine a variant or, potentially, a new type.</p> <p><u>REQUESTED CHANGE:</u></p> <p>Please clarify; what is an OSD flight crew report, and what are its contents (e.g. flight characteristic comparisons)? Is the type certificate applicant / holder responsible for creating the OSD flight crew report, and submitting it as part of the OSD certification plan for evaluation by EASA OSD experts? Or, is the OSD flight crew report created by the EASA OSD experts as part of the OSD evaluation?</p>
<p>Why is your suggested change justified?</p>	<p><u>JUSTIFICATION:</u></p> <p>“Flight crew report” and responsibility for its creation is not defined.</p>

Partially accepted.

Thank you for your comment. It is the responsibility of the TC applicant to produce the Operational Suitability Data - Flight Crew. The term has also been updated in the CS.

COMMENT #7 of 10 -

Type of comment (check one)	Non-Concur	Substantive	Editorial
			X

Affected paragraph and page number	Page: 15 Paragraph: CS FCD.300 (a)
---	---------------------------------------

<p>What is your concern and what do you want changed in this paragraph?</p>	<p><u>THE PROPOSED TEXT STATES:</u></p> <p>(a) The specific training requirements to build the necessary theoretical and practical skills to operate a specific aircraft are defined in the flight crew data.</p> <p><u>REQUESTED CHANGE:</u></p> <p>(a) The specific training requirements to build the necessary theoretical and practical skills to operate a specific aircraft are defined in the flight crew data Operational Suitability Data – Flight Crew document.</p>
--	---



Why is your suggested change justified?	<p>JUSTIFICATION:</p> <p>To clarify where the flight crew data is found.</p> <p>Partially accepted Thank you for your comment. Your comment is partially accepted. The text has been amended.</p>
--	--

COMMENT #8 of 10-

Type of comment (check one)	Non-Concur	Substantive X	Editorial
------------------------------------	-------------------	--------------------------------	------------------

Affected paragraph and page number	Page: 32- GM1 FCD.420 Evaluation process overview (3) Paragraph: <i>Third paragraph from top of page.</i>
---	--

What is your concern and what do you want changed in this paragraph?	<p>THE PROPOSED TEXT STATES:</p> <p>Normally, for level A and B differences, a two-way evaluation is not necessary. Typically, a T3 evaluation to validate level C and D differences is valid in one direction only (base to candidate aircraft). However, the applicant may request that a T3 evaluation be conducted in both directions (base to candidate aircraft, and candidate to base aircraft). The MDR (for variants only) and DR tables will reflect the validated difference levels accordingly.</p> <p>REQUESTED CHANGE:</p> <p>Normally, for level A and B differences, a two-way evaluation is not necessary, <i>and differences are valid in both directions.</i></p>
---	--

Why is your suggested change justified?	<p>JUSTIFICATION:</p> <p>The proposed text’s first sentence implies that since two-way evaluation is not necessary, then differences are valid in both directions. If this is the intent, please explicitly state so.</p> <p>Rejected. Thank you for your comment. While the text states that, in the case mentioned, a two-way evaluation is not necessary, this does not necessarily mean that the difference levels are exactly the same in both directions. The specific differences need to be assessed via an analysis by the applicant.</p>
--	---



COMMENT #9 of 10-			
Type of comment (check one)	Non-Concur	Substantive X	Editorial
Affected paragraph and page number	Page: 33 Paragraph: CS FCD.425 (b), last sentence		
What is your concern and what do you want changed in this paragraph?	<p><u>THE PROPOSED TEXT STATES:</u></p> <p>In general, level A and B differences do not require two-way testing.</p> <p><u>REQUESTED CHANGE:</u></p> <p>In general, level A and B differences, do not require two-way testing, <u>and differences are valid in both directions.</u></p>		
Why is your suggested change justified?	<p>JUSTIFICATION:</p> <p>Similar to Comment #8. The proposed text implies differences are valid in both directions. If so, please explicitly state so.</p> <p>Noted.</p> <p>Thank you for your contribution. Please refer to the reply to the previous comment.</p>		
COMMENT #10 of 10-			
Type of Comment (check one)	Non-Concur	Substantive	Editorial X
Page number and paragraph of the proposed document that is of concern.	Page: 35 Paragraph: CS FCD.425 (g), last paragraph		
	<u>THE PROPOSED TEXT STATES:</u>		

<p>What is your concern and what do you want changed in this paragraph?</p>	<p>Evaluation process: if level A or B training is appropriate, T3 may be completed by analysis. If level C or D training is appropriate...</p>
	<p><u>REQUESTED CHANGE:</u></p> <p>Evaluation process: if level A or B training is appropriate proposed, T3 may be completed by analysis. If level C or D training is appropriate proposed...</p>
<p>Why is your suggested change justified?</p>	<p><u>JUSTIFICATION:</u></p> <p>The applicant proposes a training level (A, B, C, etc.). EASA determines if the proposal is appropriate via the evaluation process.</p>
<p>response</p>	<p>Partially accepted Thank you for your comment. Your proposal is partially accepted. While it is understood that the applicant proposes the difference level, this proposal has to be accepted by EASA, who can legitimately challenge it, even before the T test, based on supporting evidence. The text has been revised.</p>

<p>2. In summary — why and wh</p>	<p>p. 4-6</p>
--	---------------

<p>comment</p>	<p>82 comment by: AIRBUS</p> <p>Summary §2.3 - Page 5</p> <p>The following sentence is not fully understood: "For currency, level E has been removed to align with the evaluation process setting type rating requirements and training programmes. Since level E is used in the context of the initial type rating for a new aircraft, commonalities or credits do not apply for currency."</p> <p>Additional explanations would be appreciated.</p>
<p>response</p>	<p>Noted. Thank you for your comment. Level E currency has been kept.</p>



CS FCD.050 Scope

p. 7-8

comment

5/

comment by: KLM

KLM would like to see a more pronounced requirement for STC applicants to indicate whether the proposed STC either does or does not (and how) affect the OSD FC

response

Noted.

Thank you for your comments. Guidance on the assessment of the impact of design changes to the OSD FC is provided in Part-21. This includes STCs. Additionally, the impact assessment methodology is part of the DOA processes approved by EASA.

comment

6/Check with KLM

comment by: KLM

KLM would like to see a uniform and mandatory format for **STC applicants** to report OSD FC effects.

response

Noted

Thank you for your contribution. Your comment regarding the need to provide guidance for establishing the effects of OSD Flight Crew is noted. However, GM related to the assessment of the effects of OSD should be provided in Part 21.

comment

12/

comment by: Piaggio Aero Industries s.p.a.

(a) The following elements belong to the scope are also evaluated, as appropriate:

~~(1) Specific type of operations or specific aircraft missions~~

(1) Training elements related to types of operations subject to specific approval under Annexes III, V and VIII to Regulation (EU) No 965/2012 on air operations

Please add Annex VII to include also our P180 product kind of operations

response

Thank you for the comment. It is rejected. Typically, the Operational Suitability Data is used by operators via specific regulatory references in the applicable portions of Air Operations Regulation 965/2012.

Annex VII (NCO) does not contain specific regulatory references to the OSD FC, and, in addition, Part-ORO, which contains references to the OSD FC, is not applicable to operators under Annex VII. Therefore, the OSD FC is not applicable to this specific kind of operations except for the relevant parts applicable under the Aircrew Regulation.



GM1 FCD.050 Scope

p. 8

comment 19/

comment by: Airbus Helicopters

Comment: The GM1 FCD.050 has been revised to remove some examples of specific type of operations although the list is indicated as not exhaustive with the indication "but are not limited to" under paragraph b). In the explanatory note of the NPA it is indicated that the aim is to review the scope for types of operations subject to specific approval (Part-SPA and SPO).

Please confirm that the TC Holder may propose in the scope of OSD FCD items going beyond the prerequisites of 965/2012?

response

Noted.

Thank you for the comment. It is not clear what 'beyond' means in this context. The logic of the interactions between the different Air Operations is supported by specific requirements associated with the OSD Flight Crew, placing obligations either on the TC/STC applicant/holder for the approval of the respective OSD elements, or on the ATO/Operator to implement the relevant data.

In principle, an ATO adheres to the Aircrew Regulations, and an Operator to the Air Operations Regulations. These contain references to the OSD FC where appropriate to allow the capture of type specific training elements, credit based on commonality, etc. Unless a provision in Regulation (EU) 965/2012 allows the use of the OSD FC for the TC/STC holder/applicant to establish these elements, credit, or provisions, they cannot be proposed for approval deviations from the applicable implementing rules or AMCs via the OSD FC.

CS FCD.100 Applicability

p. 9

comment 72/

comment by: Aero-HC

Suggestion: To prevent legal confusion, define the clear meaning of applicant in this context and use the words "TC applicant", "TC holder" or "TC applicant / holder" within the text only when differentiation is absolute necessary in the affected paragraph.

Note: what I don't think it should be necessary

Reason for suggestion :

In context of the CS-FSD, I think, the applicant can be an entity which applies for a TC or which holds already a TC and wants to change its already existing OSD.

This can be e.g. a specially interesting for a TC-holder, when another (new) type is introduced and some credits to an already existing type might be possible (see CS.FCD.100 Applicability – which addresses the TC-applicant only).



This can be understood from a legal point of view that the applicability for the CS-FSD is for an applicant of a new TC only, because in other paragraphs or e.g. also in GM1 FCD.200 "TC applicant/holder" or "TC-holder" are explicitly used.

I assume that OSDs are dynamic documents, which can or even shall be subject to change under certain situations.

e.g. a company holds already an TC/OSD for an aircraft (A) and applies now an aircraft B.

The differences in A and B might be so important that a/c B must be classified as new Type.

However, there might be for one or the other system of A and B commonalities, so that crediting, which is in general also possible over types (see CS.FCD.310), is possible.

In such a case, it must be also possible to change the OSD of a/c A – where a TC / OSD already exists – to document the credits to the new a/c B, which flight crew requirements are documented in another (new) OSD. So already a company which holds already an TC for the respective type (TC holder) can become to an applicant for this process.

I assume: The process, which leads finally to an OSD document, is not intended for other entities like ATOs or even private persons, who believe in some additional credits and want to go through the overall process to prove evidence for their opinion. (see CS.FCD.310 / where the "applicant" is stated only).

These mixing of "applicant", "TC applicant", "TC applicant/holder" etc. in CS-FCD can cause legal confusion and even legal discussion, which is not theory only and really not necessary, when using a defined – unambiguous – wording / definition within the overall document.

response

Partially accepted.

Thank you for your contribution. Your comment is understood. However, for clarity, the text will have to only refer to 'applicant' or only to 'holder' when only one of the two is affected by the specific paragraph, and to both when both are affected. As an example, when discussing changes to a TC, including the OSD, we would refer to the TC holder or STC applicant. When discussing the initial approval part of a TC application, we would refer to the TC applicant only.

GM1 CSFCD.100 Applicability

p. 9-10

comment

17/

comment by: *Aviation Academy Austria*

GM1 FCD.100 (a)(6):

The rule making body should allow the possibility to agree with the competent authority for credit to a reduced type rating training based on commonality with another type of



	the same manufacturer; if the manufacturer does not exclude it in the OSD or has fixed the amount of credit for a reduction.
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. The philosophy of the regulatory framework is rather the opposite. As stated in the Aircrew Regulation, Appendix 9 to Part-FCL, reduced type rating training may be determined under the OSD, giving credit for previous experience on similar aircraft types. The Regulation does not give this responsibility to the 'competent authority', but to the TC holder under an airworthiness approval for which EASA is responsible. Additionally, it is not a matter that can be addressed in CS-FCD.</p>
comment	<p>20/ comment by: Airbus Helicopters</p> <p>Comment : The period of validity of the type ratings is indicated to be part of the OSD but the process to define it for the TC Holder is not described in CS-FCD</p> <p>Proposal: Add in CS-FCD instructions related to the definition of the validity of the type ratings</p>
response	<p>Noted</p> <p>Thank you for your contribution. The period of validity of a type rating is prescribed in Part-FCL (FCL.740).</p> <p>The rationale of the provision is that, if so determined in the OSD FC based on the level of complexity or the handling characteristics of the specific type of aircraft, a shorter validity period may be imposed to maintain the level of safety. This will be based on considerations of Panel 2 and feedback from other Panels, as well as inputs from the applicant, during the certification process.</p>
comment	<p>71/ comment by: Aero-HC</p> <p>Suggestion: To prevent legal confusion, define the clear meaning of applicant in this context and use the words "TC applicant", "TC holder" or "TC applicant / holder" within the text only when differentiation is absolute necessary in the affected paragraph. Note: what I don't think it should be necessary</p> <p>Reason for suggestion : In context of the CS-FSD, I think, the applicant can be an entity which applies for a TC or which holds already a TC and wants to change its already existing OSD. This can be e.g. a specially interesting for a TC-holder, when another (new) type is introduced and some credits to an already existing type might be possible (see CS.FCD.100 Applicability – which addresses the TC-applicant only). This can be understood from a legal point of few that the applicability for the CS-FSD is for an applicant of a new TC only, because in other paragraphs or e.g. also in GM1 FCD.200 "TC applicant/holder" or "TC-holder" are explicit used.</p>

I assume that OSDs are dynamic documents, which can or even shall be subject to change under certain situations.
 e.g. a company holds already an TC/OSD for an aircraft (A) and applies now an aircraft B.
 The differences in A and B might be so important that a/c B must be classified as new Type.
 However, there might be for one or the other system of A and B communalities, so that crediting, which is in general also possible over types (see CS.FCD.310), is possible.
 In such a case, it must be also possible to change the OSD of a/c A – where a TC / OSD already exists - to document the credits to the new a/c B, which flight crew requirements are documented in another (new) OSD. So already a company which holds already an TC for the respective type (TC holder) can become to an applicant for this process.

I assume: The process, which leads finally to an OSD document, is not intended for other entities like ATOs or even private persons, who believe in some additional credits and want to go through the overall process to proof evidence for their opinion. (see CS.FCD.310 / where the “applicant” is stated only).

These mixing of “applicant”, “TC applicant”, “TC applicant/holder” etc. in CS-FCD can cause legal confusion and even legal discussion, which is not theory only und really not necessary, when using a defined – unambiguous - wording / definition within the overall document.

response Partially accepted
 Thank you for your contribution. Depending on the specific paragraph, the applicability may be to the applicant or to the holder of a TC/STC, or to both. EASA has attempted to follow the applicability logic.

comment 83/ comment by: AIRBUS

GM1.FCD.100 and other areas of the CS-FCD

The term "**difference training**" is hereby understood as covering familiarisation and difference training between variants as well as equipment training for aircraft modifications as defined in ORO.FC. It may be clarified in this GM as well as in CS.FCD.105 so as to avoid confusion with the "difference training" defined in ORO.FC.125 that only refers to Level C or Level D difference training between variants. It may be clarified that in CS-FCD, "difference training, when used alone, refers to the training of the difference items identified in DR tables.

Rationale/Justification: Avoid confusion with the terminology of ORO.FC

response **Not accepted**



Thank you for your contribution. Your comment is not accepted. ORO.FC.125 includes both differences and familiarization training, regardless of the level identified.

comment

84/

comment by: AIRBUS

GM1.FCD.100 - Page 9

Airbus recommend to rewrite (a)(6) as:

"credits based on commonality with another type of the same manufacturer"

Rationale/Justification: The credits based on commonality are not restricted to type rating training. They apply also to operational training such as UPRT, LVO or equipment training.

response

Accepted

Thank you for your contribution. Your comment is accepted. Additional text has been included in GM1 CS FCD.100.

comment

85/LDA-V

comment by: AIRBUS

GM1.FCD.100 - Page 10

Airbus recommend to reorganize Box 1 as follow:

- Aircraft type designation and pilot licence endorsement
- Aircraft variant designations
- Prerequisites for initial type rating and difference training (when applicable)
- Training Areas of Special Emphasis (TASE) for initial type rating and difference training related to variants as well as systems, equipment and procedures training based on aircraft modifications
- MDR tables between variants
- DR tables related to variants as well as systems, equipment and procedures training based on aircraft modifications

Rationale/Justification:

The following is also required from the applicant and is mandatory to end-user :

- Designation of the aircraft variants
- Prerequisites for the difference training (between variants or mods) when applicable
- TASE for the difference training (between variants or mods)
- MDR between variants

response

Accepted

Thank you for your contribution. Your comment is accepted. The text has been updated.

comment	<p>86/LDA-V</p> <p>GM1.FCD.100 - Page 10</p> <p>Airbus recommend to reorganize Box 2 as follow:</p> <p>Training for initial type rating and difference training (when applicable)"</p> <p>Rationale/Justification:</p> <p>When applicable, a training footprint for difference training have to be provided for reference to end-user (e.g. training footprint for Level D difference training)</p>	comment by: AIRBUS
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted.</p>	

CS FCD.105 Definitions

p. 11-12

comment	<p>15/IDA-V</p> <p>The definition of flight characteristics has been deleted while this wording is used in the document and is a key element in building differences table. It covers both performances and handling qualities.</p> <p>To ensure consistency with the description of DR and use of the word throughout the CS in several places, it is suggested to reinsert this definition and simplify it as needed, part of it having been transferred into the definition of handling characteristics.</p>	comment by: Liliium
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted.</p>	
comment	<p>21/</p> <p>Comment :</p> <p>end of sentence : "... operators for the development of DR tables"</p>	comment by: Airbus Helicopters



	Proposal: Replace DR tables by "ODR tables" which are applicable at operator level
response	Accepted Thank you for your contribution. Your comment is accepted.

comment	22/ comment by: Airbus Helicopters
	Comment : the wording :"... pilots possessing the general and specific prerequisites to enter a training course,..." is not clear regarding the activities conducted
	Proposal: replace " to enter a training course" by "to conduct evaluations"
response	Partially accepted. Thank you for your comment. The text has been revised accordingly.

comment	23/ comment by: Airbus Helicopters
	Comment : The definition of type of aircraft is used the notion of "same basic design" that is not self explanatory. Does this means aircraft under the same Type certificate Data Sheet (i.e. same Type Certificate).
	Proposal: Definition of "same basic design" is needed to clarify the interpretation of what is meant as basic design is not defined elsewhere in the regulations.
response	Noted. Thank you for your comment. The definition provided in the CS is in line with the intent of the definition of 'type of aircraft' in the Aircrew Regulation. The purpose is to confirm a principle, part of the original intent of the regulatory framework, based on which variants of an aircraft type only exist under the same Type Certificate. For aircraft with a separate TC, reduced type rating training courses may be established under the provisions in Appendix 9 to Part-FCL of the Aircrew Regulation, based on credit for previous experience on similar aircraft types.

comment	46/ comment by: Embraer S.A.
	Comment summary
	Our comment is related to the following:
	(f) Flight characteristics means handling characteristics or performance characteristics



	<p>perceivable by a pilot. Flight characteristics relate to the natural aerodynamic response of an aircraft, particularly as affected by changes in configuration or flight path parameters.</p> <p>Rationale:</p> <p>The definition of Flight characteristics was removed from CS FCD.105, however this term is still being used in many other parts of the document.</p> <p>Suggested resolution</p> <p>To maintain the definition of Flight Characteristics once the term is still valid.</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted.</p>
comment	<p>74/ comment by: Dassault-Aviation</p> <p>1°) TASE :</p> <p>a) TASE Definition:</p> <p>§2.3 (in subject 1 and subject 2) clearly states its intention to clarify the concept of TASE (Training Areas of Specific Emphasis), but its definition is almost not impacted: CS.FCD.105 §(n) : <i>TASE means specific knowledge and skills required for the safe operation of an aircraft type or variant, use of equipment, application of procedures and performance of operations.</i></p> <p>We propose to complete the definition of CS-FCD.105 as follows: <i>“(p) TASE means specific knowledge and skills required to be highlighted during training to enhance the safe operations of an aircraft type or variant, use of equipment, application of procedures and performance of operations. TASE are identified when misunderstanding, skills errors or skills deficiencies need to be prevented, and or when not already covered by specific training requirements and provisions already covered in Part FCL and civil aviation aircrew and air operations regulations.”</i></p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. The definition has to be concise, in principle. However, ample guidance on what a TASE is and how it is generated is included in the GM to CS-FCD.</p>
comment	<p>79/ comment by: UK CAA</p> <p>Paragraph No: CS FCD.105 Definitions (d)</p> <p>Comment: “Very similar “handling and flying characteristics could mean subtle, but important, differences in technique or procedure.</p>

	<p>Justification: There have been accidents in which similar technique or procedure principles were cited as not appropriate.</p> <p>Proposed Text: Amend to read:</p> <p><i>Common Take-off and Landing Credit (CTLIC)</i> means a programme or process that allows credit for recent experience between aircraft types that can be demonstrated to have very similar handling, flying characteristics and operating technique/procedures during take-off and initial climb, approach and landing, including the establishment of the final landing configuration</p>
response	<p>Accepted</p> <p>Thank you for your comment. The text has been amended to reflect your suggestions.</p>
	<p>87/LDA-V comment by: AIRBUS</p> <p>CS.FCD.105.(g) - Page 11</p> <p>Airbus recommend to change "DR tables" by "ODR tables" at the end of the definition to read as "Differences Requirement (DR) means a description of the differences regarding the level of training and checking, or currency between a base and a candidate aircraft and their impact on flight characteristics and changes of procedures, meant to be used by ATOs and operators for the development of training courses or ODR tables."</p> <p>Rationale/Justification: DR tables are meant to be used by the operators for the development of ODR tables (as defined in ORO.FC).</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
	<p>88/ comment by: AIRBUS</p> <p>CS.FCD.105.(k) - Page 11</p> <p>Airbus recommends to rewrite as follows:</p> <p>"Master Differences Requirements (MDR) means those requirements that pertain to differences between types of aircraft or variants of the same type of aircraft."</p> <p>Rationale/Justification: MDR between types of aircraft are also provided for reduced type rating training.</p>

response	Accepted Thank you for your contribution. Your comment is accepted.
comment	89/ comment by: AIRBUS CS.FCD.105 and other sections of the CS-FCD The removal of the flight characteristics is justified as the CS-FCD, and in particular the T2 test, address changes in handling characteristics. It is recommended that a general review of the other CS.FCD paragraphs is performed to replace the term flight characteristics by handling characteristics when appropriate. Rationale/Justification: Consistency of the CS.FCD paragraphs
response	Accepted Thank you for your comment. The document has been reviewed to distinguish between 'flight characteristics' and 'handling qualities'.
comment	90/ comment by: AIRBUS CS.FCD.105.(h) - Page 11 Airbus recommend to remove "to enter a training course" to read "Evaluation Subjects means pilots possessing the general and specific prerequisites, who are used in T tests for the purpose of determining the compliance of the proposed OSD FC initial or difference training elements, as well as any credit." Rationale/Justification: Evaluation subjects may only be needed to conduct a T2 without A T3 i.e. without entering a training course.
response	Partially accepted Thank you for your contribution. Your comment is partially accepted. The text has been amended slightly differently than proposed.
comment	100/ comment by: Airbus Helicopters Comment: Change of procedure is one difference criteria to be evaluated within the DR tables process (ref CS FCD 105 (g)), but "procedure change" is not precisely defined. Proposal: A change of procedure may be considered whereas an element of an equipment design is changed (e.g. change on equipment displays or controls) or any aircrew action on the

	candidate aircraft or equipment leads to a different reaction by the candidate aircraft systems from the base aircraft or equipment
response	Not accepted Thank you for your contribution. Your comment is not accepted. EASA believes that these considerations are part of the OSD evaluation and T testing process, and should not be described in a prescriptive way in the CS.

comment	124/ comment by: ATR
	Could you please explain how the ATOs or operators can develop their own DR tables?

response	Noted Thank you for your contribution. Your comment is noted. DR tables are developed by the TC/STC holder and approved as part of the OSD. Operators have to develop their ODR tables in accordance with the applicable Per-ORO provisions in Regulation (EU) 965/2012. ATOs develop training courses in accordance with Regulation (EU) 1178/2011 also taking into account the content of the OSD FC.
----------	--

comment	125/ comment by: ATR
	As the definition of flight characteristics has been removed, are we combining the definition of flight characteristics in handling characteristics itself? If that is the case, should we replace the flight characteristics by handling characteristics on the DR table? However CS FCD.410 Difference levels - General (b) mentions that, "flight characteristics address handling qualities and performance, while procedures include normal, non-normal and emergency items." This definition needs to be updated too?

response	Accepted. Thank you for your comment. The definition of Flight characteristics has been reinstated based on other comments. A distinction has been made between flight characteristics and handling qualities.
----------	---

GM1 FCD.105 Definitions	p. 12-13
--------------------------------	----------

comment	47/ comment by: Embraer S.A.
---------	---

Comment summary

The definition of DR (Differences Requirement) is missing in the acronyms list.



	Suggested resolution
	To include the definition of DR in the acronyms list.
response	Not accepted Thank you for your comment. The acronyms list already contains DR (Difference Requirement).
comment	91/LDA -V comment by: AIRBUS GM1 FCD.105 - Page 13 Airbus recommend to keep the ODR acronym as it is still used in the definition of DR tables.
response	Accepted Thank you for your contribution. Your comment is accepted. The text has been revised accordingly.

CS FCD.200 Determination of a pilot type rating and a variant

p. 13-14

comment	92/ comment by: AIRBUS CS FCD.200.(b) Page 14 Airbus recommend to rewrite (b) as follows: "The determination of whether a certain aircraft is a new type is made at the request of the applicant in accordance with Subpart D." Rationale/Justification: The subpart D contains the process to determine a new type or not but it does not address variant determination. A new variant will be determined in accordance with the new guidance proposed by this NPA in GM1 FCD.200.
response	Not accepted Thank you for your contribution. Your comment is not accepted. Indeed, whether a new aircraft is a new type or a variant is 'determined' based on the T testing methodology included in CS-FCD, Subpart D. There may be cases, however, when an applicant could request to obtain approval for a separate type of aircraft, although the aircraft in question could be classified as a variant. This would, of course, be acceptable.



GM1 FCD.200 Determination of a pilot type rating and a variant

p. 14

comment

77/

comment by: *Dassault-Aviation***2°) DR tables :**

We propose not to force TCH to deal with “design modifications to an existing type or variant that do not determine a new variant” only with DR tables when another mean is already in place to support the development of the training programs.

*“Design modifications to an existing type or variant that do not determine a new variant **may be** are only addressed through changes to the DR tables or supplemental DR tables **(or any other equivalent mean)** to support operators in the development of their training programmes.”*

response

Not accepted

Thank you for your contribution. Your comment is not accepted. The logic embedded in the CS follows the principles captured in Part-21 which are specific to the OSD FC. The TC holder does indeed have the obligation to assess the impact of design changes on the OSD FC. If there is an impact according to the criteria defined in Part-21, the related changes to the OSD FC must be submitted for approval, or approved under privileges, as applicable. It would not be sensible to generate a variant under the type rating each time there are such changes, which may be limited to a few lines in the DR tables. Therefore, EASA has established principles, under the CS-FCD, to determine when these modifications generate a new variant and when not.

CS FCD.300 Pilot type rating training and operational training requirements for a specific aircraft

p. 15

comment

93/

comment by: *AIRBUS*

CS FCD.300 (d) - Page 15

References to the OSD are missing in the current Air-Crew and Air-Ops regulations for data that was provided in the OEB reports and that were grand-fathered in the FCD. This is the case for instance for the LIFUS sectors that the OEM typically specify for consideration by the operators after a full or reduced type rating training. A GM should be added to clarify this fact and to keep this grandfathered OEB data compliant with the CS-FCD.

Rationale/Justification: Consideration of the grand-fathered OEB data in the FCD.

response

Noted



Thank you for your contribution. Your comment is noted. It is understood that the OEB provided 'information' related to training elements without a clear legal basis or specific 'hooks' in the Aircrew and Air Operations regulations. The OSD system, on the other hand, must interface the OSD FC content with the specific references in the regulations applicable to organizations. The OSD FC may only contain provisions when these regulations allow applicants to deviate, establish credits or specific training elements. When grandfathering OEB reports, these principles were taken into account.

GM1 FCD.300 Pilot type rating training and operational training requirements for a specific aircraft

p. 16-18

comment 9/ comment by: Piaggio Aero Industries s.p.a.

(c) Training Methods
 (2) Hands-on training ...
Please add "or aircraft on ground" between training devices
 (3) Demonstration
 ... can only be adequately addressed in a FSTD with the appropriate capability to achieve the training objectives *or in an aircraft thus..."*
~~*Depending upon the element to be trained, acceptable training media could be an FSTD or an aircraft.*~~
Please insert again flight in aircraft as acceptable method

response Accepted
 Thank you for your contribution. We accept your proposed change to include aircraft in (2) and to reformulate point (3) Demonstration to better clarify the use of "aircraft".

comment 24/ comment by: Airbus Helicopters

Comment :

Consistency with the title of CS FCD.300

Proposal:

"Add:

Pilot type rating training and operational training requirements for a specific aircraft" in the title of GM1 CS FCD.300

response Accepted
 Thank you for your contribution. Your comment is accepted. The text has been amended.

comment	<p>25/ comment by: Airbus Helicopters</p> <p>Comment : Reduced training footprint</p> <p>The modification of an existing type or variant should also be considered in paragraph (b): Familiarisation could also be considered for modification within a variant or a type but not necessarily in the frame of the creation of a new variant</p> <p>Proposal:</p> <p>Modify the text by “If the determination is made that the base and candidate aircraft are considered variants or as a modification of an existing type or variant, only differences or familiarisation training is required.”</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. When differences are established within an existing type or variant because of a modification not determining a separate variant, a footprint is not required, and the differences are captured at the DR tables level.</p>
comment	<p>26/ comment by: Airbus Helicopters</p> <p>Comment : GM1 CS FCD.300 (c) Training Method Should not be limited to the type rating</p> <p>Comment :</p> <p>Add in paragraph (c) "... pilot type rating and operational training"</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
comment	<p>48/ comment by: Embraer S.A.</p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>"(ii) when the impact on the safety of the flight is considered to be associated with aircraft failure conditions with a severity classified as Major or higher."</p>

Rationale:

This item may lead one to think that ANY emergency /abnormal procedure associated to a failure classified as MAJOR or higher in the Safety Assessment, must be identified as a TASE. However, it is important to point out that the severity classification from the Safety Assessment is not automatically associated to an alert type and an abnormal/emergency procedure. Not all failure conditions with a severity classified as Major or higher should necessarily be part of the training program. The proposal presented by EASA could create an obligation to train a massive number of failure conditions (since many of them would be classified as TASE) that could not aggregate any benefits to the training. Also, an unintended consequence of it would be deviating the focus of failure conditions that are deemed as required to be trained. Besides, this proposal does not reflect the current practice to identify a TASE during OSD FCD evaluations. In fact, if our understanding of EASA proposal is accurate, it represents an appreciable change of the TASE concept, and it does not seem eligible to be addressed during the Regular Update of CS-FCD, which should include only subjects that are considered non-complex, non-controversial, and mature.

Suggested resolution

Embraer proposes to remove the GM1 FCD.300(d)(1)(ii) depicted below:

"(ii) when the impact on the safety of the flight is considered to be associated with aircraft failure conditions with a severity classified as Major or higher."

GM1 FCD.300 (d)(1)(i) already provides an adequate guidance on when a TASE should be identified.

response

Accepted

Thank you for your comment. The text has been amended to improve its clarity.

comment

75/

comment by: *Dassault-Aviation*

b) TASE Development

Dassault consider that the proposed criteria to identify the TASE in GM1.FCD.300§(d) does not take enough into account the flight crew standpoint, i.e the flight deck effects (CAS messages, flags, vibrations, odors....) that are always associated with one or several operating procedure(s).

We therefore propose to complete the §(d) "Development of TASE in GM1.FCD.300 as follows:

"(d) Development of Training Areas of Special Emphasis (TASE)

(1) TASE are identified:

(i) in order to prevent misunderstandings, skill errors or skill deficiencies having an impact on the safety of the flight, TASE may be specified as mandatory items specific to



	<p>a given aircraft type, variant or equipment to be integrated in training (type-rating training, difference or familiarization training, or equipment training as applicable), or AND</p> <p>(ii) when the impact on the safety of the flight is considered to be associated with aircraft failure conditions with a severity classified as Major or higher, AND</p> <p>(iii) When Airplane Flight Manual emergency and abnormal procedures require specific knowledge or skills to be accomplished."</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

comment	<p>76/ comment by: Dassault-Aviation</p> <p>b) Mandate for TASE In GM1.FCD.300 §(d)(3), TASE are applicable to both initial and recurrent training. Nevertheless, only TASE for initial training are mandatory in Box 1. Dassault therefore recommend to include TASE for recurrent training in box 3 as well , as knowledge and skills are highly linked to recurrent training.</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text in Box 1 has been amended.</p>

comment	<p>94/ comment by: AIRBUS</p> <p>GM1 FCD.300 (d)(1) - Page 17</p> <p>For the TASE identification, it is recommended to remove the (ii) and only to keep the condition of the (i).</p> <p>It is also recommended to slightly update the proposed paragraph (i) as follows:</p> <p>"In order to prevent knowledge misunderstanding as well as practical skill errors or deficiencies having an impact on the safety of the flight, TASE may be specified as mandatory items..."</p> <p>Rationale/Justification: The second condition is proposed to be removed as it was limited to TASE associated with systems failures for aircraft certified in accordance with 25.1309. By removing this condition, it can also apply to any pilot tasks (including those not related to the management of aircraft failures, for instance pilot skills in normal operation) and the current provision in (i) "having an impact oN the safety of the flight" is generic enough to address all TASE.</p>
---------	---

response Partially accepted
Thank you for your contribution. Your comment is partially accepted. The text has been amended to cover the different cases taking into account remarks from other commenters.

comment 95/ comment by: AIRBUS

GM1 FCD.300 (d)(4) - Page 17

Airbus recommend to remove the sentence in parenthesis to only read "TASE are typically associated with training items requiring at least level B difference training".

Rationale/Justification: A Level B training is typically assigned when the knowledge difference is considered as complex i.e. the knowledge difference is made of many combined elements that are not self-explanatory at first glance. It should not be directly related to the safety impact.

response Accepted
Thank you for your contribution. Your comment is accepted. The text has been amended.

comment 96/LDA-V comment by: AIRBUS

GM1 FCD.300 (d)(5) - Page 18

Airbus recommend to complete (iii) as:

(iii) in-service or training feedback or experience.

Rationale/Justification: Feedback from training organisations are also captured to determine the need for additional TASE.

response Accepted
Thank you for your contribution. Your comment is accepted. The text has been amended.

comment 103/ comment by: Airbus Helicopters

Comment :

GM1 CS FCD.300 (d)(1) The criteria for TASE identification need to be clarified. The condition (i) is presented as a nice to have criteria "TASE **may** be specified" whereas condition (ii) seems to always apply.



This contradicts with the definition of a TASE which means specific knowledge or skills required for the safe operation of an aircraft. If a TASE is required and then mandatory for the end-user, the criteria cannot be left at the choice of the applicant (“may be specified”)

Furthermore, the level of expected prevention of misunderstandings, skill errors or skill deficiencies and the extent of the repercussions on the safety of the flight is not specified in paragraph (i), leaving a wide range of possible interpretation of what level of impact on the safety need to be considered.

The condition (ii) is presented as a criteria that can alone trigger the identification of a TASE.

The condition (ii) is understood as requiring the analysis of the severity of the associated failure conditions classified as Major. However the Major definition is not provided. Note that in CS-MMEL, severity classification terminology have been defined in CS.MMEL 105 definition.

Major classification is not required by 1309 on all product (e.g. CS 27 helicopters).The interpretation of this criteria is therefore not clear for all products.

Furthermore, it is not clear whether the classification of the failure condition severity is made with the TASE in place or in the absence of the TASE.

Consequently it is preferred not to enter into this level of details for the moment and postpone the definition of a more precise set of criteria to future rulemaking tasks.

Proposal:

It is proposed to reword paragraph (i) as follows:

"TASE are identified in order to prevent misunderstandings, skill errors or skill deficiencies having an impact on the safety of the flight and specified as mandatory items specific to a given aircraft type, variant or equipment to be integrated in training (type-rating training, difference or familiarisation training, or equipment training as applicable)."

It is proposed to delete paragraph (ii)

response

Partially accepted

Thank you for your contribution. Your comment is partially accepted. The paragraph has been amended based on various comments to improve its clarity.

comment

126/

comment by: ATR

Does this mean all abnormal and emergency procedures should be identified as TASE?

response

Noted

Thank you for your contribution. Your comment is noted. The meaning is different. The text has been amended to improve its clarity.



CS FCD.305 LIFUS

p. 18

comment

14/

comment by: Liliuim

Suggestion to modify the current text to allow TC Holder via OSD to suggest a minimum number of legs for LIFUS.

The Air Ops Regulation does not specify the number of required legs (ref.: AMC1.ORO.FC.230).

In order to ensure plain level field between operators, while having safety objective in mind, it is highly recommended to allow TC Holder to insert the minimum LIFUS requirement onto the OSD Flight Crew report, in addition to existing provisions.

response

Not accepted

Thank you for the contribution. Your comment is not accepted. The number of LIFUS sectors is left to the operator and the competent authority, based on the criteria defined in Part-ORO. The TC holder/applicant can limit the privileges of the pilot using the OSD FC, for a certain number of flight hours to be performed under the supervision of an instructor, via the appropriate provisions in FCL.720.A (d).

CS FCD.310 Credit for operation on more than one type or variant

p. 18

comment

73/

comment by: Aero-HC

Input:

Possible contradiction of CS-FCD intentions by crediting between variants / types with AMC2.ORA.ATO.125 (c)(2) Type Training program

Reason for this input:

CS-FCD describes an extensive process to determine training requirements, which includes also training / checking credits between different variants and even different types.

However, **AMC2.ORA.ATO.125 (c)(2) Type Training program** states:

If the ATO wishes to provide a training course that includes credit for previous experience on similar types of aircraft, such as those with common systems or operating procedures with the new type, the entry requirements to such courses should be specified by the ATO and should define the minimum level of experience and qualification required of the flight crew member.



Whilst the process to evaluate similarities / communalities between variants/types and finally to allow credits are standardized and extensive with CS-FCD, there is no standard how an ATO can proof evidence that there are similarities between types which might justify credits.

Note: Also there might some communalities to another type but the applicant (TCH) didn't consider this type – whatever reasons - in his application for the evaluation process according CS-FCD.

Therewith, this AMC can become a contradiction to the intentions of CS-FSD, when an ATO applies other credits as given in the applicable OSD.

Note: On the other hand, it is very likely that no ATO will disclaim credits given by the OSD – otherwise such an ATO will not be competitive on the market.

This AMC was already reason for confusion in context of possible crediting for type ratings in context with CS-FCD/OSD.

Let's assume, it is not possible / allowed to give more credits as stated in the OSD. (a specially credits to other types which are not evaluated in the OSD)
Isn't it?

Let's assume further, if there is still no OSD for an (e.g. older) A/C type or if there are no credits described in the OSD for this type, no crediting is possible / allowed.
Isn't it?

If these assumptions are correct – in which cases the AMC might be applicable, still necessary?

If these assumptions are not correct.
Isn't it a contradiction to the intentions of the CS-FCD/OSD because the process can be easily overruled by more or less justified decision with reference to this AMC.

Note: Both the CS-FCD and an AMC are from the legal point on the same level.
However, application of OSDs is obligate by BR and IRs

Practical example:

Between the C525 and some other C5xx types are no familiarization / differences evaluation stated in the OSD until now.

If the ATO now proof evidence about similarities of one or other system, is crediting possible?

If an applicant (TC) didn't include a type into its "CS-FCD application" – whatever reason - but there are clear communalities, can an ATO claim to get credits?

From the practical point of view, it might make sense in some cases, but from the legal point, it might be a contradiction to the comprehensive intentions of CS-FCD.

response

Noted

Thank you for your comment. It is noted. However, this task deals with the Certification Specifications for Flight Crew Data, in the context of the OSD. We suggest you forward



your considerations or questions on the content of the Aircrew Regulation to EASA via the appropriate channels.

comment

97/

comment by: AIRBUS

CS FCD.310 - Page18

Airbus recommend to rename this paragraph as "CS FCD.310 Credits based on commonality" and to add a new sub-paragraph before (a).(1) reading as "credit for training, checking and currency for type rating and operational training". Renumber (a).(1) and (a).(2) respectively as (a).(2) and (a).(3).

Rationale/Justification: While CS.FCD.300 refers to training requirements, the scope of CS.FCD.310 distinctly refers to training credits based on commonality. Credits based on commonality are not limited to operation of several types or variants as they also include credit for pilots transitioning from one aircraft type to another type without the objective to operate more than one type. Credit for "transition training" may include reduced type rating training and checking as well as credits for operational training (e.g. UPRT, LVO, equipment training).

response

Not accepted

Thank you for your contribution. Your comment is not accepted. The differences between reduced type-rating training, credit for operations on more than one type or variant and credit for commonality are described in the CS text.

GM1 FCD.310 Credit for operation on more than one type or variant

p. 18

comment

49/

comment by: Embraer S.A.

Comment summary

Our comment is related to the following:

c) other credit provided for in the relevant subparts of Annex III to Regulation (EU) No 965/2012 as determined under the OSD.

Rationale:

As stated in this section, credit can be given for common equipment, common procedures, and types of operations. It is important to point out that credits for training, checking, or currency are non-mandatory items (recommendations) described under



Box 4. Based on that, our understanding is that other credit should not be given only under Annex III, but also under the annexes V and VIII, as per GM1 FCD.050 (a)(1).

Suggested resolution

To include the option for other credits as per relevant subparts of annexes V and VIII.

Our suggestion is to replace the wording:

"c) other credit provided for in the relevant subparts of Annex III to Regulation (EU) No 965/2012 as determined under the OSD."

By the following

"c) other credit provided for in the relevant subparts of Annexes III, V and VIII to Regulation (EU) No 965/2012 as determined under the OSD."

response Accepted
Thank you for your contribution. Your comment is accepted. The text has been amended.

comment 98/ comment by: AIRBUS

GM1 FCD.310 - Page 18

The GM1 FCD.300.(b) may be moved to this GM and completed so as to cover all the guidance pertaining to credits based on commonalities.

Rationale/Justification: Regroup in one single GM the guidance referring to credits based on commonalities.

response Not accepted
Thank you for your contribution. Your comment is not accepted.
Commonalities for a reduced type-rating are not the same as other kinds of credit allowed under the Air Operations Regulation. The grouping of items is based on the applicability of the specific CS paragraph.

CS FCD.400 Difference Requirement (DR) tables

p. 19

comment 10/ comment by: Piaggio Aero Industries s.p.a.



(c) Manoeuvres

Please do not remove (5) "aircraft performance in specific manoeuvres"

Rationale: Performance is to be considered relevant for a variant training, not only changes in cockpit controls or equipment. For example, a relevant change in Approach speeds is an increase in workload that must be considered as relevant changes in CG and weight. A change in Approach speed normally compels a change in Stall Speed and Take off Speed.

response

Accepted

Thank you for your contribution. Your comment is accepted. The text has been amended.

comment

99/

comment by: AIRBUS

CS FCD.400.(a) - Page 19

Airbus recommend to rewrite (a) as follows:

(a) DR tables are provided for any evaluation of differences between a base and a candidate aircraft for type rating and variant assessment, for the content of difference or familiarisation training between variants, for new systems or equipment and associated procedures, as well as for credits based on commonality.

Rationale/Justification: DR tables address the procedural changes associated with new systems or procedures. A change in recommended procedures (e.g. SOP) not associated with an aircraft modification is not addressed in DR tables. DR tables addressed credits based on commonality such as reduced type rating training and credits based on commonalities (e.g. credits for similar equipment in case of operation of more than one type or transition training).

response

Accepted.

Thank you for your comment. The text has been amended.

Appendix to CS FCD.400 — Compilation of ODR tables

p. 19

comment

27/LDA-V

comment by: Airbus Helicopters

Comment :

"DR tables are:

- (a) General
- (b) Systems
- (c) Manoeuvres"



	<p>"(c) tables are understood as differences for practical training. Then tables (b) and (c) are understood as differences for theoretical training. Consequently levels C, D and E may not be relevant for tables (a) and (b) Breakdown theoretical/practical is easier to handle but implies to segregate possible difference levels Proposal: More guidance to help applicants to conduct their DR analysis would be welcomed in a GM1.FCD.400 Explanations on how to better understand and handle DR tables may be required.</p>
response	<p>Noted Thank you for your contribution. Your comment is noted. However, the link between the category in the DR table and the level of differences is not that straightforward, and difference levels should be kept independent if there is no specific need to restrict the CS for specific reasons. Your comment on requesting more guidance is noted and will be taken into consideration for future revisions.</p>

CS FCD.405 Master Difference Requirement (MDR) tables
--

p. 20

comment	<p>28/ comment by: <i>Airbus Helicopters</i></p> <p><u>Comment :</u></p> <p>CS FCD.405: Is MDR limited between variants of the same Type Rating or could it be established between aircraft of different Type Ratings?</p> <p><u>Proposal:</u></p> <p>This requirement should make clear whether a MDR is proposed when candidate aircraft and base aircraft are of different type rating (e.g. for stating credits for checking or currency).</p>
response	<p>Accepted Thank you for your contribution. Your comment is accepted. The text has been amended. The text has been amended.</p>
comment	<p>101/ comment by: <i>AIRBUS</i></p> <p>CS FCD.405 - Page 20</p> <p>Airbus recommend:</p>

	<p>* To remove in (a) the fact that MDR tables are "EASA approved" as the whole FCD is EASA approved. MDR tables do not have any difference with other FCD in terms of approval.</p> <p>* To add additional info (even if self evident) in (b) to read "MDR tables are specified in terms of the minimum difference levels for training, checking and currency and contain the highest level identified in the applicable DR tables."</p> <p>Rationale/Justification: Consistency with the other parts of the CS-FCD</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

CS FCD.415 Difference levels — Training, checking and curren

p. 20-24

comment	<p>2/ comment by: <i>SIM OPS</i></p> <p>In footnote (1) for (1) Aerplane it says.. <i>(ii) FFS level D or FTD level B in accordance with CS-FSTD issue 3.</i></p> <p>The difference in the FCS for these devices concern reduced fidelity levels for sound cues, visual cues fidelities and the elimination of the need for motion cue in the case of the FTD level B. If the minimum required is a FTD level B then shouldnt it simply say that instead of referring to a FFS level D as well?</p> <p>It is however quite feasible that a FSTD could be produced and qualified with a FCS that sits between that for FFS Level D and FTD level B (for example with Sound cue at R fidelity level , visual cue at S fidelity level and motion cue at R fidelity level). This device would still be good enough (it exceeds FTD level B but not quite as good as FFS level D) so surely it would be better to express the requirement as follows:-</p> <p style="text-align: center;"><i>(ii) FSTD with a FCS at least equal to that of a FTD level B</i></p> <p>This may also require the abbreviation FCS to be added in the appropriate place.</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>
comment	<p>3- comment by: <i>SIM OPS</i></p>



	<p>In (1) Aeroplane, Footnote (2) it says..</p> <p><i>(1) Aeroplane: The FSTD Capability used for training must meet the training objectives and requirements set-out in Regulation (EU) No 1178/2011.</i></p> <p>Why has this requirement not been expressed in terms of FSTD levels or FCS capability as per those contained in footnotes (1) and (3)?</p>
response	<p>Accepted</p> <p>Thank you for your contribution.</p> <p>The structure of the footnotes has been revised based on this and other proposals from different commenters. The rationale is that for initial type rating training, the Aircrew Regulation specifies the capabilities of FSTDs to be used for training. For difference training, it is within the scope of the OSD to identify the level of fidelity of devices/FSTDs used to give training regarding the specific differences.</p>
comment	<p>4/ comment by: SIM OPS</p>
	<p>In Footnote (3) for (1) Aeroplane it says...</p> <p><i>(ii) FFS level D or an FSTD having at least a type-specific flight deck layout and structure, flight model, ground reaction and handling characteristics, and flight controls and forces, or</i></p> <p>This could be simplified to be more consistent with the proposed terminology in CS-FSTD A issue 3 as follows:-</p> <p><i>(ii) FSTD having at least flight deck layout and structure, flight model, ground reaction and handling characteristics, and flight controls and forces FSTD features at specific (S) fidelity level in the FCS</i></p>
response	<p>Partially accepted.</p> <p>Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>
comment	<p>11/ comment by: Piaggio Aero Industries s.p.a.</p>
	<p>Page 20/41 (a) Table and then Footnote (1)</p> <p>(1) Aeroplane:</p> <p>(i) FFS level D qualified in accordance with CS-FSTD Initial Issue or Issue 2, or</p> <p>(ii) FFS level D or FTD level B qualified in accordance with CS-FSTD Issue 3, or</p> <p><i>(iii) Aeroplane (to be inserted again)</i></p> <p><i>Comment: we do not find a rationale for retaining (iii) Helicopter in (2) Helicopter, while (iii) Aeroplane is not retained in (1) Aeroplane, leaving FSTD only.</i></p> <p>Then Footnote (2): <i>same comment of Footnote (1)</i></p>

response	<p>Page 22/41 (4) Level D Training <i>Please retain the following phrase proposed for deletion:</i> <i>"The use of manoeuvre training device or aircraft is limited for the conduct of specific manoeuvres or handling differences, or for specific equipment or procedures."</i></p> <p>Page 23/41 (c) Difference level - Checking (3) Level C Checking: <i>please add "or in an aircraft"</i> after a suitable FSTD (4) Level D Checking: <i>please add "aircraft or"</i> before FSTD capable of level D training or higher</p> <p>Partially accepted. Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>
comment	<p>18/ comment by: <i>Aviation Academy Austria</i></p> <p>Not all FSTDs are certified in accordance with CS-FSTD(A), as assumed by CS FCD.415: Footnote (1) Include devices certified according JAR-FSTD(A) Footnote (3) Include devices certified according JAR-FSTD(A)</p> <p>If a reference is made to an FSTD level, only Level D is referenced. As the technical difference between Level C and D device is minor also Level C devices are fulfilling the training task in the context of type rating and difference training.</p> <p>Partially accepted. Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>
comment	<p>29/LDA-V comment by: <i>Airbus Helicopters</i></p> <p>Comment : Level E for currency: Announced removed pages 1 and 5 of the NPA but is still present in the table .Are the notes in italic under the CS FCD.415 intended to be published within CS FCD issue 2? If not, the indication that level E currency is only applicable to legacy aircraft should be specified somewhere.</p> <p>Proposal: Clarify that level E currency remains available for aircraft initially certified with CS FCD initial issue, even in case of major significant change to the type certificate.</p>



response Noted
Thank you for your contribution. Your comment is noted. Level E currency remains available for aircraft initially certified in accordance with the initial issue of CS-FCD.

comment 30- comment by: Airbus Helicopters

Comment :

(4) Level D training "

Could we identify a level D (FFS) if we consider a FFS C&D as minimum training means but no need of a new Type Rating?

Linked with CS FCD 415 (a)

Proposal:

Revise the text to " ...the applicant ~~needs to~~ may propose the features that define the FSTD capability required to meet the training objectives ..."

response Not accepted
Thank you for the contribution. Your comment is not accepted. The training devices identified in the CS are based on the associated level of differences and the required capability, to the best of the qualification requirements, and the framework of the OSD FC is such that devices should be identified in the clearest possible way. Equivalency in terms of training and/or checking objectives may be established in the relevant parts of the Aircrew Regulation. If this is the case, the responsibility for approving the use of an equivalent device in a training course or programme lies with the Competent Authority.

comment 31/ comment by: Airbus Helicopters

Comment :

CS FCD.415 (b) Difference levels — Training (5) Level E training Last sentence added: "...Recurrent training and checking credits for operation on more than one type..." Why is it referred to checking in this paragraph applicable to difference training?

Proposal:

The part of the sentence applicable to checking credits should be moved in relevant § for level E checking (415.(c).(5))

response Partially accepted
Thank you for your comment. It is partially accepted. The reference to checking was deleted from (b)(5). No reference was included in (c)(5), as level E checking has been removed from the CS.



comment	<p>32/ comment by: Airbus Helicopters</p> <p>Comment : CS FCD.415 (c) Difference levels —Checking (3) Level C checking "...partial check using a suitable FSTD" : not consistent with FCD.415 (a) where level C definition says "qualified device" which can be understood as an OTD qualified specifically</p> <p>Proposal: FCD.415 (a) and FCD.415 c(3) must be aligned</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. It is understood that a 'qualified device' is considered to be as such only if it is qualified in accordance with the applicable CS-FSTD. Hence, qualified device and qualified FSTD have the same meaning.</p>
comment	<p>33 comment by: Airbus Helicopters</p> <p>Comment : CS FCD.415 (c) Difference levels —Checking (4) Level D checking Could we proposed a level D (partial) checking associated with a FFS as minimum training device?</p> <p>Proposal: "Add the same sentence than for CS FCD.415 (b) ""...the applicant may propose the features that define the FSTD capability required to meet the checking objectives ...""</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. The framework of the OSD FC is such that devices should be identified in the clearest possible way. Equivalency in terms of training and/or checking objectives may be established in the relevant parts of the Aircrew Regulation. If this is the case, the responsibility for approving the use of an equivalent device in a training course or programme lies with the Competent Authority.</p>
comment	<p>50/ comment by: Embraer S.A.</p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>(ii) FFS level D or FTD level B qualified in accordance with CS-FSTD Issue 3.</p> <p>Rationale:</p> <p>The content of the Issue 3 is not available at this moment, once its discussion is on-going.</p>

	<p>Suggested resolution</p> <p>To remove the reference to CS-FSTD Issue 3 until the final decision is published and available.</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. The content of CS-FSTD Issue 3 has been deemed mature enough for inclusion in the CS in order to avoid inconsistencies once it is published. However, the structure of the footnotes has been revised based on this and other comments.</p>

comment

51/

comment by: *Embraer S.A.***Comment summary**

Our comment is related to the following:

Footnote (1)

(1) Aeroplane:

(i) FFS level D qualified in accordance with CS-FSTD Initial Issue or Issue 2, or

Rationale:

EASA removed the possibility to deliver level D difference training in an FTD level 2. Although it might not be a very common device, it is important to keep the harmonization with international authorities, since the operational evaluations are usually performed jointly by different authorities. The FTD level 2 seems to be an adequate device to deliver level D differences training.

EASA has also specified the need of an FFS level D to comply with difference training level D for aeroplanes. Sometimes, specially for new products, an FFS Level D may not be available for a while, but an interim FFS Level C, as allowed in Regulation (EU) No 1178/2011.

Suggested resolution

Replace the wording:

"Footnote (1)

(1) Aeroplane:

(i) FFS level D qualified in accordance with CS-FSTD Initial Issue or Issue 2, or"



	<p>By the following sentence:</p> <p>"Footnote (1)</p> <p>(1) Aeroplane:</p> <p>(i) FTD Level 2, or FFS; or"</p>
response	<p>Partially accepted.</p> <p>Thank you for your contribution. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>

comment	<p>52- comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>Rationale:</p> <p>EASA has specified the need of an FFS level D to comply with difference check level D for aeroplanes. Sometimes, specially for new products , an FFS Level D may not be available for a while, but an interim F</p> <p>Suggested resolution</p> <p>Replace the following:</p> <p>"Footnote (3):</p> <p>(1) Aeroplane:</p> <p>(i) FFS level D qualified in accordance with CS-FTSD Issue 2, or</p> <p>(ii) FFS level D or an FSTD having at least a type specific flight deck layout and structure, flight model, ground reaction and handling characteristics, and flight controls and forces, or"</p> <p>By:</p> <p>"Footnote (3):</p> <p>(1) Aeroplane:</p> <p>(i) FFS qualified in accordance with CS-FTSD Issue 2, or</p>
---------	---

response	<p>(ii) FFS or an FSTD having at least a type-specific flight deck layout and structure, flight model, ground reaction and handling characteristics, and flight controls and forces, or"</p> <p>Partially accepted. Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>
comment	<p>53/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>(iii) Aeroplane</p> <p>Rationale:</p> <p>The footnote (3) is specifying the “FSTD” to be used for checking as per the Table in CS FCD.415(a). So, the reference to Aeroplane can be removed from the footnote, once there is a clear statement in the same table that training, checking, and currency can be performed on either an FSTD or aircraft.</p> <p>Suggested resolution</p> <p>To remove item (iii) under Footnote (3)(1).</p>
response	<p>Partially accepted Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>
comment	<p>54/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>(iii) Helicopter</p> <p>Rationale:</p> <p>The footnote (3) is specifying the “FSTD” to be used for checking as per the Table in CS FCD.415(a). So, the reference to Helicopter can be removed from the footnote, once</p>

	<p>there is a clear statement in the same table that training, checking, and currency can be performed on either an FSTD or aircraft.</p> <p>Suggested resolution</p> <p>To remove the item (iii) under Footnote (3)(2).</p> <p>The same applies to Footnote (1): (2)(iii).</p>
response	<p>Partially accepted</p> <p>Thank you for your contribution. Your comment is noted. The structure of the footnotes has been revised based on this and other proposals from different commenters.</p>

comment	<p>55/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>Training for level D differences requires a training device that has accurate,...</p> <p>Rationale:</p> <p>The sentence seems to be incomplete.</p> <p>Based on the Differences Level table (a) and the footnote (1), the FSTD term is missing.</p> <p>Suggested resolution</p> <p>Change the sentence:</p> <p>Training for level D differences requires a training device that has accurate,...</p> <p>To :</p> <p>Training for level D differences requires an FSTD that has accurate,...</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

comment	<p>56/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p>
---------	---



	<p>Our comment is related to the following:</p> <p>The training requires a ‘high fidelity’ environment to attain or maintain knowledge, skills, or abilities that can only be satisfied by the use of FSTDs[...]</p> <p>Rationale:</p> <p>The whole document refers to knowledge, skills and/or abilities. Our suggestion is to harmonize this part with the other parts of the document.</p> <p>Suggested resolution</p> <p>"The training requires a ‘high fidelity’ environment to attain or maintain knowledge, skills, or abilities that can only be satisfied by the use of FSTDs[...]"</p> <p>To:</p> <p>"The training requires a ‘high fidelity’ environment to attain or maintain knowledge, skills, and/or abilities that can only be satisfied by the use of FSTDs[...]"</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
comment	<p>80/ comment by: UK CAA</p> <p>Paragraph No: CS FCD.415 Difference levels — Training, checking and currency Footnote (3), sub para (2)(b)(4) Level D Training</p> <p>Comment: The word device appears to have been deleted incorrectly</p> <p>Proposed Text: Amend to read: Training for level D differences requires a device that has accurate,</p>
response	<p>Partially accepted</p> <p>Thank you for your comment. The term ‘training device’ has been replaced with ‘FSTD’. The rationale is that any device meeting that level of capability must be qualified in accordance with the applicable CS-FSTD and, therefore, be identified accordingly.</p>
comment	<p>104/ comment by: AIRBUS</p> <p>CS FCD.415 and other areas of the CS-FCD</p>

It is our understanding that according to EASA regulations, an FSTD is always a qualified device. A non qualified device cannot be designated as an FSTD. We recommend to use throughout the CS-FCD the term "FSTD" when referring to a training device qualified in accordance with the CS-FSTD and to refer to "non-qualified training device" or "other training device" for non qualified training devices and other means. It is proposed that a "non qualified training device" may be developed in accordance with certain criteria of the CS-FSTD at Issue 3 (for instance to comply with certain fidelity criteria) without being formally qualified. "Other training device" refer to the other training tools. This should be reflected in the table of CS.FCD.415 as well as in the various difference levels definition of CS.FCD.415 in particular for Level C training as well as in the CS.FCD.420 and 425.

Rationale/Justification: Consistency with the CS-FSTD

response (Partially accepted
Thank you for your contribution. Your comment is partially accepted. The text has been amended.

comment 105/ comment by: AIRBUS

CS-FCD.415 (a) - Page 20

Airbus recommend to rephrase the sentence introducing the table of CS.FCD.415 as follows:

"The table below summarizes the acceptable methods and means to satisfy the difference level for training, checking, and currency:"

Rationale/Justification: Improvement

response Not accepted
Thank you for your contribution. Your comment is not accepted..
The wording 'acceptable methods and means' is not considered appropriate for a requirement, as it is terminology more consistent with GM.

comment 106/ comment by: AIRBUS

CS-FCD.415 (a) Page 20

The level C and Level D currency cells should be updated to reflect the acceptable training methods and means and not only the differences that should be addressed. The Footnote (1) for Level D currency is restricted as Level D currency item may be reviewed on the aircraft in operation or in an FSTD capable to accomplish the



	<p>designated manoeuvres as applicable. The Level E currency has been removed so this cell should be left empty.</p> <p>(Updated text provided by email)</p> <p>#106. Could you please correct the first sentence as follows: "The level C and Level D currency cells should be updated to reflect the acceptable currency methods and means and not only the differences that should be addressed."</p> <p>Rationale/Justification: Consistency</p>
response	<p>Not accepted Thank you for your contribution. Your comment is not accepted. The text has been amended to improve clarity.</p>
comment	<p>107/ comment by: AIRBUS</p> <p>CS-FCD.415 (a) - Page 20</p> <p>The footnotes should use letters rather than numbers to differentiate aeroplane and helicopters as the footnotes are already numbered.</p> <p>Rationale/Justification: Ease of reading and avoid confusion in references.</p>
response	<p>Accepted Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
comment	<p>108/ comment by: AIRBUS</p> <p>CS-FCD.415 (a) Footnote (1) - Page 20</p> <p>The footnote (1) in the initial issue of the CS-FCD gave the various FSTD acceptable and other means for Level D T/C/C while the proposed changes seem to only provide the minimum FSTD qualification level (for instance the aeroplane is not provided as an acceptable means). Any change is the way to read these foot notes between the two revisions of the CS-FCD should be clarified. For aeroplane, an FTD Level 2 (in accordance with CS-FSTD prior to issue 3) or an FTD level B (for issue 3), an FFS Level D or an aeroplane (when applicable) are acceptable means for Level D T/C/C.</p> <p>Rationale/Justification: Consistency with the CS-FCD at initial issue</p>



response Partially accepted
Thank you for your contribution. Your comment is noted. The structure of the footnotes has been revised based on this and other proposals from different commenters.

comment 109/ comment by: AIRBUS

CS-FCD.415 (a) Footnote (2) - Page 21

This footnote (2) should also address the difference between the CS-FSTD issues as it is done in the footnote (1) For aeroplane, the word "capability" should be removed to read "The FSTD used for training must meet the training objectives and requirements set-out in Regulation (EU) No 1178/2011".

Rationale/Justification: Consistency issues

response Partially accepted
Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.

comment 110/ comment by: AIRBUS

CS-FCD.415 (a) Footnote (3) Page 21

The differences between this footnote (3) and the footnote(2) is not clear. This footnote (3) should also address the difference between the CS-FSTD issues as it is done in the footnote (1).

Use the term: "specific flight deck layout and structure" as per CS-FSTD in lieu of "type-specific flight deck layout and structure..." as per CS-FSTD language.

Rationale/Justification: Consistency issues

response Partially accepted
Thank you for your comment. The structure of the footnotes has been revised based on this and other proposals from different commenters.

comment 111/ comment by: AIRBUS

CS-FCD.415.(b) - Page 22

Airbus recommend to correct a typo in the before-last paragraph of level D training to read "Training for level D differences requires an FSTD that has accurate...".

response	<p>Please remove "motion cues" in this paragraph as motion cues should not be required for Level D training.</p> <p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
----------	---

GM1 FCD.415 Difference levels — Training, checking and curren
--

p. 24-27

comment	34/	comment by: <i>Airbus Helicopters</i>
---------	-----	---------------------------------------

Comment :

GM1 CS FCD.415 (b) Difference levels —Training (3) Level C training "Examples of devices acceptable for level C training: Consistency with table in CS FCD.415 (a) which mentions only "System devices" should be ensured

(ii) qualified devices replaced by ""FSTDs"": could OTDs (as defined in Part FCL) be qualified? "

Proposal:

Modification as follows:

(i) ""interactive training **device** to include...""

(ii) ""qualified **other training devices (OTDs)** or flight simulation devices (FSTDs)""

response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. OTDs are not qualified in accordance with the applicable CS-FSTD.</p>
----------	---

comment	35/	comment by: <i>Airbus Helicopters</i>
---------	-----	---------------------------------------

Comment :

GM1 CS FCD.415 (c) Difference levels —Checking (3) Level C Checking "Example of ""qualified device"" mentioned in FCD.415 (a) for a partial PC is missing here. could OTDs (as defined in Part FCL) be qualified for checking"

Proposal:

Add examples of "qualified devices " that can be used for a partial checking.

response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended to clarify that an FSTD is required for the proficiency check described in the paragraph.</p>
----------	---



comment

81/

comment by: UK CAA

Paragraph No: GM1 FCD.415 Difference levels — Training, checking and currency, sub para (b) (5)

Comment: The UK CAA believes Safe OEI training/checking principles must be addressed

Justification: There have been accidents in which the 'good' engine has failed with the simulated failed engine at idle.

Proposed Text: Amend to read:

(5) Level E training

For safety reasons, if the training is performed in an aircraft, **consideration must be given** to high-risk situations like engine loss, by not shutting down the engine but rather simulating the engine failure **by using safe OEM recommended methods such as Train Mode** or by setting the affected engine at idle or zero thrust..

response

Accepted

Thank you for your contribution. Your comment is accepted. The text has been amended.

comment

112/

comment by: AIRBUS

GM1 FCD.415 (b)(1)(ii) - Page 25

Even if it is not proposed to be removed in this NPA, Airbus recommend to remove the (ii) in level A training. Level A training item may have an impact on safety if not known by the flight crew. Level A differs from level B item by the complexity of the knowledge information to be trained. The safety impact should not be a differentiating criterion between level A and level B.

(updated text provided by email)

#112. The correct text is:

"Even if this paragraph is not proposed to be modified in this NPA, Airbus recommends removing this paragraph (ii) in GM for level A training."



response Accepted
Thank you for your contribution. Your comment is accepted. The text has been amended.

CS FCD.420 Evaluation process overview

p. 27-28

comment 36/ comment by: Airbus Helicopters

Comment :

CS FCD.420 (b) (1) T1, T2, T3 "Same basic design definition vs similar aircraft types? Refer to above comment on CS FCD.105 Definitions.

T2 and T3 are possible for both conditions (Candidate level E or not)."

Proposal:

Please, clarify definition of similar aircraft type vs same basic design.

response Accepted
Thank you for your contribution. Your comment is accepted. The text has been expanded for clarity, distinguishing between the two cases.

comment 37/ /comment by: Airbus Helicopters

Comment :

CS FCD.420 (b) (1) T1, T2, T3 Reduced type rating : terminology of similar aircraft type can be subject to interpretation

Proposal:

New wording for the last sentence:

"When a reduced initial type rating is sought based on previous experience on **different** aircraft types, the T2 and T3 tests are used for this purpose"

response Not accepted
Thank you for your comment.
The use of 'similar aircraft types' comes from Appendix 9 of Part-FCL and is consistent with the logic. The similarities are, in fact, the element allowing the reduction in the training.

comment 113/ comment by: AIRBUS

CS FCD.420.(b) - Page 27

Airbus recommend to remove the condition "that share the same basic design" in order to read "The T1, T2 and T3 evaluations shall be performed to validate difference training,



checking and currency requirements between a base and a candidate aircraft ". Another solution could be to replace this condition by ""that share commonalities".

Rationale/Justification: The term "that share the same basic design" stems from the definition of type of aircraft in Part FCL and the same definition is proposed to be added in CS FCD.105. A T2 and T3 may be performed between aircraft with different type ratings as per the last added sentence of this paragraph and other parts of the CS-FCD. Those aircraft may not share "the same basic design" accordingly to this FCL definition.

(updated text propose by email)

#113. Could you please modify the full comment as follows:

" CS FCD.420.(b).(1) - Page 27

Airbus recommends changing this paragraph to read "The T1, T2 and T3 evaluations are performed to compare a base and a candidate aircraft in order to establish whether the candidate aircraft is a new type or a variant or a modification of an existing type or variant and/or to validate difference training, checking and currency requirements between the two aircraft. The level of differences determines the minimum required training, checking and currency standards as requirements applicable to the candidate aircraft. When credits based on commonalities (reduced initial type rating training based on previous experience on similar aircraft types or credits for operation on several types) are sought , the T2 and T3 tests are also used for this purpose. "

Rationale/Justification:

A T1 or T3 test is not systematic to validate a difference training. Sometimes, only a T2 test is performed to validate that a modification has no impact on the type rating. The term "that share the same basic design" stems from the definition of type of aircraft in Part FCL and the same definition is proposed to be added in CS FCD.105. Though it is not defined how to establish that two aircraft share the same basic design. The T1, T2 and T3 provide the process to determine that two aircraft share the same type rating and therefore share the same basic design as per the definition of type of aircraft. It is therefore preferable to avoid using this term in the CS-FCD.

response

Partially accepted

Thank you for your comment. CS FCD.420 (b)(1) has been reworded to improve clarity on the specific cases (variants within one type vs. reduced TR training between different types).



response	<p>"T1 Requested?" diamond</p> <p>Rationale:</p> <p>The current flow chart automatically sets the training as Level A or B, when the answer to "T1 Requested?" is NO.</p> <p>If a T1 is not requested, it is probably because no additional training is needed. This might be the case, for example, for design changes that do not affect the OSD FCD.</p> <p>Suggested resolution</p> <p>Our suggestion is to include a "No training required" after the T1 Requested diamond, at the "NO" path.</p>
	<p>Partially accepted</p> <p>Thank you for contribution. Your comment is partially accepted. The text has been amended to address all the comments related to the evaluation process diagram.</p>
comment	<p>58/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>T1 Box</p> <p>Rationale:</p> <p>In the flow chart, there is an "F" letter close to the "Waive T1" path line, when actually it should be in the path line out of the T1 box towards the T2 box. If the T1 test has been waived, it is not accurate to say that the applicant failed the T1 test.</p> <p>Suggested resolution</p> <p>To correct the flow chart by moving the "F" letter to the suggested path line, from T1 box to 2 box.</p>
response	<p>Partially accepted</p> <p>Thank you for contribution. Your comment is partially accepted. The text has been amended to address all the comments related to the evaluation process diagram.</p>
comment	<p>59/ comment by: <i>Embraer S.A.</i></p>

Comment summary

Our comment is related to the following:

T3 diamond

Rationale:

After the completion of T2, the applicant must determine whether the T3 test is required or not. Therefore, the T3 diamond is followed by a Yes or NO path. For the sake of clarity, the wording inside the T3 diamond should say "T3 Requested?" instead of only T3.

Suggested resolution

To include the question "T3 Requested?" in the referred part of the flow chart.

response

Partially accepted

Thank you for contribution. Your comment is partially accepted. The text has been amended to address all the comments related to the evaluation process diagram.

comment

114/

comment by: AIRBUS

Appendix to CS FCD.420 - Page 29

Airbus recommend to replace the first question "Candidate Level E?" by "Candidate New Type rating"

Rationale/Justification: The fact that a new type rating is proposed or not for a candidate aircraft is the main question to enter this process. The fact that Level E training "normally" lead to the assignment of a new type rating is explained in the description of the T2 and T3 process but there is not dedicated stand-alone paragraph for this fundamental outcome of the T process.

response

Partially accepted

Thank you for contribution. Your comment is partially accepted. The text has been amended to address all the comments related to the evaluation process diagram.

GM1 FCD.420 Evaluation process and evaluation descriptions overview

p. 30-32

comment

39/

comment by: Airbus Helicopters



	<p>Comment : GM1 CS FCD.420 (b) "(2) T2 evaluation (3) T3 evaluation" T2 and T3 definitions in case of a candidate level E with commonalities are missing</p> <p>Proposal: add T2 and T3 definitions for candidate level E when commonalities credits are sought</p>
response	<p>Partially accepted</p> <p>Thank you for contribution. Your comment is partially accepted. The text has been amended to address all the comments related to the evaluation process diagram.</p>

comment	<p>60 comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>When the differences between the base and the candidate aircraft are very small and there is certainly no impact on the handling qualities,...</p> <p>Rationale:</p> <p>The use of "very small" in this sentence may be too subjective and not appropriate to determine the adequacy of a T1 test...</p> <p>Suggested resolution</p> <p>Our suggestion is to use a less subjective wording harmonized with other parts of this CS.</p> <p>Our suggestion:</p> <p>When the differences between the base and the candidate aircraft are not significant from the flight crew perspective, and there is certainly no impact on the handling qualities,...</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

comment	<p>61/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p>
---------	---



Our comment is related to the following:

"The T2 test compares handling qualities using **predetermined flight manoeuvres** to confirm that the candidate aircraft may be considered a variant of the base aircraft."

Rationale:

The meaning of **predetermined flight manoeuvres** is not clear in the document. The wording should clearly state that the flight manoeuvres are previously agreed between the Agency and the applicant.

Suggested resolution

Replace the wording:

"The T2 test compares handling qualities using **predetermined flight manoeuvres** to confirm that the candidate aircraft may be considered a variant of the base aircraft."

By the following:

"The T2 test compares handling qualities using **predetermined flight manoeuvres (previously agreed between the Agency and the applicant)** to confirm that the candidate aircraft may be considered a variant of the base aircraft."

response

Partially accepted

Thank you for your contribution. Your comment is partially accepted. The text has been amended to further clarify it.

comment

62/

comment by: *Embraer S.A.*

Comment summary

Our comment is related to the following:

"..., then the T2 test is successful, and a T3 test from the base aircraft to the candidate aircraft can be performed to validate the difference levels up to level D."

Rationale:

As specified in CS FCD.245(f), "If a subsequent T3 test is not requested, level A or B training can be assigned", a T3 after the T2 may not be requested, when setting level A or level B difference training. The wording used in this session, could make this more clear.

Suggested resolution



response

To include the information that a T3 test is not always required.

Our suggestion is to replace the sentence :

"..., then the T2 test is successful, and a T3 test from the base aircraft to the candidate aircraft can be performed to validate the difference levels up to level D."

By the following:

"..., then the T2 test is successful, and a T3 test **(if requested)** from the base aircraft to the candidate aircraft can be performed to validate the difference levels up to level D."

Accepted

Thank you for your contribution. Your comment is accepted. The text has been amended.

comment

63/

comment by: *Embraer S.A.*

Comment summary

Our comment is related to the following:

"The test has the purpose of identifying system, equipment, procedures, and manoeuvre differences, and validating the proposed difference training, checking and currency requirements."

Rationale:

The T3 test can assign difference training levels A, B, C, or D. In order to maintain harmonization with AMC1 ORO.FC.125 and FCL, Embraer is suggesting a modification to the statement above, to make clear that the purpose of this test is to assign familiarization (level A or B) or difference (C or D) training.

Suggested resolution

To update the statement in order to maintain harmonization with the AMC1 ORO.FC.125 and FCL.

Our suggestion is to replace the sentence:

"The test has the purpose of identifying system, equipment, procedures, and manoeuvre differences, and validating the proposed difference training, checking and currency requirements."

By the following:



response	<p>"The test has the purpose of identifying system, equipment, procedures, and manoeuvre differences, and validating the proposed familiarization or difference training, checking and currency requirements."</p> <p>Accepted Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
comment	<p>115/ comment by: AIRBUS</p> <p>GM1 FCD.420.(a) - Page 31</p> <p>Airbus recommend to complete the second paragraph so as to read "In addition to the above, the applicant may request the approval of reduced initial type rating training based on previous experience on similar aircraft types as well as credits based on commonality for operation on more than one type. In this case, T2 and T3 tests are used as the means of compliance.</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Accepted Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
comment	<p>116/ comment by: AIRBUS</p> <p>GM1 FCD.420 (b)(2) - Page 31</p> <p>For the T2 evaluation profile, it is recommended to indicate that "The T2 evaluation profile is established through mutual agreement between the applicant and the EASA based on the differences potentially affecting the handling qualities between the base and the candidate aircraft.". It is also recommended to replace "base" by "candidate" in the last sentence of this paragraph as well as to extend the scope of use of an FFS for a T2 so as to read "An approved level D FFS may be used in place of the candidate aircraft as agreed with the EASA".</p> <p>Rationale/Justification: Improvement and extension of the scope of the use of an FFS for a T2.</p>
response	<p>Partially accepted Thank you for your comment, which is partially accepted. The text has been adapted in the first part. As for the use of an FFS in lieu of the candidate aircraft, EASA would like to keep this restricted to specific cases where mainly safety considerations dictate it. The text has, however, been softened.</p>

comment	<p>117/</p> <p style="text-align: right;">comment by: AIRBUS</p> <p>GM1 FCD.420 (b)(3) - Page 32</p> <p>Accordingly to the T2, it is recommended to propose separate descriptions of the T3 conducted between two aircraft sharing the same type rating for the purpose of evaluating a difference training up to Level D as opposed to the T3 to evaluate the reduced type rating course up to Level E between two aircraft with different type ratings.</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

comment	<p>118/</p> <p style="text-align: right;">comment by: AIRBUS</p> <p>GM1 FCD.420 (b)(6) - Page 32</p> <p>The criteria described to design the T6 also apply for the design of the T2. A note may be added to ensure consistency of the criteria between the two tests for the comparison of the low speed manoeuvres.</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

CS FCD.425 Evaluation process and evaluation descriptions
--

p. 33-36

comment	<p>16/LDA-V</p> <p style="text-align: right;">comment by: Lilium</p> <p>Add the word 'by' before EASA in the second paragraph.</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted.</p>



comment	<p>40/ comment by: Airbus Helicopters</p> <p>Comment : CS FCD.425 (c) (4) training aids or material training aids: never used before (Is it equivalent as "material" (cf FCD.415...)?) . Terminology should be harmonised in the whole document</p> <p>Proposal: "... which aircraft, variants, training material, training devices (OTDs), FSTDs, ..."</p>
response	<p>Partially accepted</p> <p>Thank you for your comment. Your comment is partially accepted. The proposal has been included in point 1.</p>
comment	<p>41/ comment by: Airbus Helicopters</p> <p>Comment : CS FCD.425 (d) Evaluation purpose and application T2: if failed, the T5 is needed but in case of commonalities, the T2 is already done, and only the T3 is needed</p> <p>Proposal: Modify column Application: "... failure sets level E and requires T5 and T3 if required T3 for commonality credit"</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. It must not be assumed that a T2 performed under the assumption of determining a variant uses the same content and profile as a T2 to established credit between types. If the first one has failed, the assumptions have to be re-assessed and, in principle, re-tested. Specific cases may exist, at the evaluation level, where credit from the failed T2 may be taken. The assessment has to be performed on a case-by-case basis.</p>
comment	<p>42/ comment by: Airbus Helicopters</p> <p>Comment : CS FCD.425 (d) Evaluation purpose and application T3: if failed, the T5 is needed but in case of commonalities, the T2 and T3 are already done,</p> <p>Proposal: Modify column Application: "... failure sets level E and requires T5. For commonality credit if required, T2 and T3 are already done"</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. It must not be assumed that a T2 performed under the assumption of determining a variant uses the same content and profile as a T2 to established credits between types. If the first one has</p>

failed, the assumptions have to be re-assessed and, in principle, re-tested. Specific cases may exist, at the evaluation level, where credit from the failed T2 may be taken. The assessment has to be performed on a case-by-case basis.

comment 43/ comment by: Airbus Helicopters

Comment :

CS FCD.425 (e) Evaluation T1 T1 validates level A/B. "...The evaluation may be accomplished in a training device, ...--> The validation that self or aided instruction is the right level should be performed with the corresponding level (A or B) training material. Training devices for above levels shouldn't be required.

Proposal:

Modification:

"... This evaluation may be accomplished with appropriate A or B level training materials to achieve the training objectives""

response Noted
Thank you for your contribution. Your comment is noted.
Your comment is already captured by the text 'For minor level A or B differences, this evaluation may be conducted through analysis.' The term 'analysis' refers to the review of training material.

comment 44/ comment by: Airbus Helicopters

Comment :

CS FCD.425 (f) Evaluation T2 T2 related to commonality credit for a new type rating (Candidate level E) are missing

Proposal:

Also consider the T2 related to commonality credit for a new type rating (Candidate level E) as already mentioned in above comment FCD.420

response Noted
Thank you for your contribution. Your comment is noted. The case is already included in the description of evaluation 5 (T5) in CSFCD.425(i).

comment 45/ comment by: Airbus Helicopters

Comment :

CS FCD.425 (g) Evaluation T3 - Evaluation Subjects "the evaluation subject cannot receive the proposed training before proceeding to the evaluation !

Why the applicant could not propose the subject as for the other evaluations? "

Proposal:

Delete the end of the sentence "... having been given.... For the candidate aircraft".



	Add "... based on a proposal by the applicant"
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. In the logic of the CS, the 'T3' test is the verification that the training proposed by the applicant is adequate, meaning checking the proficiency of the evaluation subjects having been exposed to the proposed training.</p>
comment	<p>64/ comment by: <i>Embraer S.A.</i></p> <p>Comment summary</p> <p>Our comment is related to the following:</p> <p>"In general, level A and B differences do not require two-way testing."</p> <p>Rationale:</p> <p>Embraer understands that in general, Level A and B differences do not require two-way testing and the same difference level will be applicable for both:</p> <ul style="list-style-type: none"> • from the base aircraft to the candidate aircraft; • from the candidate aircraft to the base aircraft. <p>This wording could make this understanding more clear.</p> <p>Suggested resolution</p> <p>Complement the following sentence :</p> <p>"In general, level A and B differences do not require two-way testing."</p> <p>With the following:</p> <p>"In general, level A and B differences do not require two-way testing, and unless specified in the OSD, the same difference level will be applicable from the base aircraft to the candidate aircraft, and from the candidate aircraft to the base aircraft."</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. The fact that level A and B differences do not require two-way testing means that, in any case, the applicant should perform the appropriate analysis. It does not mean that the same level is strictly applicable both ways. There may be cases where the level of differences in one direction is A and in the other direction is B, as an example.</p>

comment	<p data-bbox="381 203 430 241">67/</p> <p data-bbox="1096 203 1422 241" style="text-align: right;">comment by: <i>Embraer S.A.</i></p> <p data-bbox="381 283 625 325">Comment summary</p> <p data-bbox="381 357 868 388">Our comment is related to the following:</p> <p data-bbox="381 430 917 462">"..., training aids, training devices, FSTDs, ..."</p> <p data-bbox="381 504 511 535">Rationale:</p> <p data-bbox="381 577 1422 672">Our understanding is that both training devices and FSTDs have the same meaning. Our recommendation is to remove training devices from this statement or clarify what is the difference between the two terms.</p> <p data-bbox="381 714 641 745">Suggested resolution</p> <p data-bbox="381 787 1242 819">To update the statement by removing the reference to training devices.</p> <p data-bbox="381 861 885 892">Our suggestion is to replace the sentence:</p> <p data-bbox="381 934 917 966">"..., training aids, training devices, FSTDs, ..."</p> <p data-bbox="381 1008 592 1039">By the following:</p> <p data-bbox="381 1081 706 1113">"..., training aids, FSTDs, ..."</p>
response	<p data-bbox="381 1134 495 1165">Accepted</p> <p data-bbox="381 1165 1422 1239">Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

comment	<p data-bbox="381 1312 430 1354">68/</p> <p data-bbox="1096 1312 1422 1354" style="text-align: right;">comment by: <i>Embraer S.A.</i></p> <p data-bbox="381 1396 625 1438">Comment summary</p> <p data-bbox="381 1470 868 1501">Our comment is related to the following:</p> <p data-bbox="381 1543 1422 1648">"This evaluation may be accomplished in a training device, FFS an FSTD with the appropriate FSTD capability to achieve the training objectives, or aircraft as appropriate."</p> <p data-bbox="381 1690 511 1722">Rationale:</p> <p data-bbox="381 1764 1422 1827">As detailed in our previous comment, the same applies in this statement. Our recommendation is to remove training devices from this statement.</p>
---------	--

Suggested resolution

To update the statement by removing the reference to **training devices**, and also the FSTD, which is duplicated.

Our suggestion is to replace the wording :

"This evaluation may be accomplished in a training device, FFS an FSTD with the appropriate FSTD capability to achieve the training objectives, or aircraft as appropriate."

By the following :

"This evaluation may be accomplished in an FSTD with the appropriate capability to achieve the training objectives, or aircraft as appropriate."

response

Accepted

Thank you for your contribution. Your comment is accepted. The text has been amended.

comment

69/

comment by: *Embraer S.A.***Comment summary**

Our comment is related to the following:

"(3) The Agency EASA may waive the T1 test if a T2 and **T3 tests is are to be performed.**"

And

"Evaluation purpose: to evaluate handling qualities using specific flight manoeuvres to determine whether level A, B, C or D training is appropriate **to be validated via a T3 test.**"

Rationale:

According to the flow chart, and CS FCD.245(f) in the sentence "If a subsequent T3 test is not requested, level A or B training can be assigned" ,the T3 test is not mandatory after the conclusion of a T2, for the determination of training levels A or B.

The proposed wording should be adapted to make it more clear and consistent with the the evaluation process.

Suggested resolution

To include the information that a T3 test is not always required.



	<p>Our suggestion is to replace the wording :</p> <p>"(3) The Agency EASA may waive the T1 test if a T2 and T3 tests is are to be performed."</p> <p>By:</p> <p>"(3) EASA may waive the T1 test if a T2 test is to be performed."</p> <p>And replace the wording:</p> <p>"Evaluation purpose: to evaluate handling qualities using specific flight manoeuvres to determine whether level A, B, C or D training is appropriate to be validated via a T3 test."</p> <p>By:</p> <p>"Evaluation purpose: to evaluate handling qualities using specific flight manoeuvres to determine whether level A, B, C or D training is appropriate and it may be validated via a T3 test (if requested)."</p>
response	<p>Partially accepted</p> <p>Thank you for your comment. The text has been amended in a slightly different way than suggested.</p>
comment	<p>78/ comment by: <i>Dassault-Aviation</i></p> <p>3°) Evaluation 3 (T3) test evaluation subjects: Dassault propose to modify the definition of the T3 evaluation subject in CS.FCD.425 §(g): "Evaluation subjects: pilots designated by EASA, trained and experienced in the base aircraft as proposed by the applicant, and having been given the proposed differences training or reduced initial type rating training programme for the candidate aircraft."</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. It is the prerogative of EASA to determine whether the level of training and experience of an evaluation subject is adequate for the specific test.</p>
comment	<p>119/ comment by: <i>AIRBUS</i></p> <p>CS FCD.425 (b) - Page 33</p>

	<p>Airbus recommends to remove the restriction that indicates that MDR apply only to aircraft variants as it applies also between aircraft types. Airbus suggest to indicate: "When an evaluation is carried out, the T1, T2 and T3 evaluation tests compare the candidate aircraft with the base aircraft. DR tables and MDR tables (between variants or types) that address the differences between the base and the candidate aircraft are established."</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>

comment	<p>120/ comment by: AIRBUS</p> <p>CS FCD.425 (c) Page 33</p> <p>In (c).(2), remove "example" as DR tables are no more "example ODR tables"</p> <p>In (c).(4), extend the means of evaluation to read "the aircraft, variants, training aids, training devices, FSTDs, analysis or any other satisfactory means as agreed between the applicant and the EASA and needed to support the evaluation are identified"</p> <p>Rationale/Justification: Other means to support the evaluation may be proposed by the applicant for EASA acceptance as long as they enable to conduct a representative evaluation (e.g. use of engineering simulation device)</p>
response	<p>Partially accepted</p> <p>Thank you for your comment. The first part is accepted and the text has been amended. The (c)(4) portion is not accepted. The example of the engineering sim provided here is covered by the 'training aids'. Means of compliance other than those offered in the CS may be used in line with the principles in Part-21.</p>

comment	<p>121/ comment by: AIRBUS</p> <p>CS FCD.425 (f) - Page 34</p> <p>Please amend this section accordingly to the comments made for the new GM1 FCD.420. It is recommended to propose separate descriptions of the T2 conducted between two aircraft for the purpose of showing that they have similar HQ and therefore may share the same type rating as opposed to the T2 performed between two aircraft with different types for the purpose of establishing credits based on commonalities.</p>
---------	---



	<p>In the last paragraph of this sub-section (g), the term "FSTD" should be used in lieu of "FFS" to indicate that several FSTD (FTD Level 2 or B, FFS Level D) are adequate for Level D training.</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Accepted</p> <p>Thank you for your contribution. Your comment is accepted. The text has been amended.</p>
	<p>122/LDA-V comment by: AIRBUS</p> <p>CS FCD.425 (g) - Page 35</p>
	<p>Please amend this section accordingly to the comments made for the new GM1 FCD.420. it is recommended to propose separate descriptions of the T3 conducted between two aircraft sharing the same type rating for the purpose of evaluating a difference training up to Level D as opposed to the T3 to evaluate the reduced type rating course between two aircraft with different type ratings.</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. A T3 test is only possible for two aircraft sharing the same type rating. See Appendix 2, Evaluation process, for further details.</p>
	<p>123/ comment by: AIRBUS</p> <p>CS FCD.425</p>
	<p>The use of the term "T evaluation by analysis" as used for the T1, T2 and T3 should be reviewed and possibly discarded. It is recommended to restrict the use of "T test" or "T evaluation" for evaluation with evaluation subjects. It should be clarified that an analysis may replace the need for a T test (T1, T2 or T3) upon agreement between the applicant and the agency. In very specific cases, an analysis may also replace a T3 to validate training requirements higher than Level B.</p> <p>Rationale/Justification: Consistency with other sections of the CS-FCD</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. Your comment is not accepted. Although your comment has a certain merit, from a logical point of view, amending the text in this</p>

sense would be not appropriate at this stage as it would have significant impacts. Additionally, the logic currently in the CS is widely understood and does not change the practical methodology, thus simplifying the approach by identifying a limited number of testing conditions, with different means of compliance.



Appendix A — Attachments

 [B-H020-REG-20-TDS-47 - Cmts EASA NPA 2020-08 Regular update of Cert Specs for OSD CS-FCD.pdf](#)

Attachment #1 to comment [#70](#)

 [Comments_NPA2020-08 OSD FCD v2 2020.11.19.pdf](#)

Attachment #2 to comment [#38](#)

