Appendix 1: Summary of comments received during the development of the regulatory material

Overview of the main comments received on NPA 2020-15

All comments have been reviewed, assessed and, where applicable, addressed. Table 1 provides a detailed overview of the main comments raised in relation to NPA 2020-15, and the EASA responses addressing them.

Table 1: Main comments received on NPA 2020-15 and EASA responses

Comments on NPA 2020-15	How they have been addressed in the Opinion
General comments	
A hybrid system of FSTD types/levels and FSTDs with FCS has limitations compared with the FCS-only approach. This hybrid approach requires many features to be at the same level. The proposed FSTD classification is deemed misleading and a potential basis for future conflicts.	The Opinion proposes an FCS-only framework, allowing a greater variety of FCSs and, consequently, a greater variety of FSTDs suitable for selected training tasks.
The number of FSTD features and their descriptions are not optimal. The stakeholders requested reorganisations of two features: 'flight model' and 'ground reaction and handling characteristics'.	The current amendments incorporate 14 FSTD features, whereas NPA 2020-15 incorporated only 12 features. The content of these features has been adjusted to prevent overlap. Additionally, feature names have been revised to enhance their relevance for FSTD users.
Some stakeholders suggested adding malfunctions as an FSTD feature and requested, where possible, that the original equipment manufacturer provide baselines to simulate the specific malfunctions. It was assumed that malfunctions could only be classed as none (N), generic (G) or representative (R), as many root causes might lead to similar malfunctions.	The proposal was not accepted. A simulated malfunction typically changes an aircraft system's state. The 'aircraft systems' feature concerns the system operation for malfunctions as well. A malfunction may also result in, for example, different cueing, so 'sound cueing' and 'vibration cueing' should give appropriate cues for the malfunction. In addition, if there were to be a separate feature for malfunctions, it would lead to conflicts within the framework. For example, if the aircraft systems feature were at level S, but the malfunction feature at level G, it would be difficult to understand what would be

Comments on NPA 2020-15	How they have been addressed in the Opinion
	expected from the system simulation for any malfunction.
There was a proposal to incorporate CS-FSTD(A) and CS-FSTD(H) into one document due to the common philosophy of the FSTD features and fidelity levels.	The proposal was accepted. The draft CS-FSTD incorporate the certification specifications for both aeroplanes and helicopters.
Transitional provisions for existing qualified FSTDs proposed in NPA 2020-15 are unclear and suboptimal.	The new provision (Article 10b) provides an exhaustive overview of the transitional provisions for all existing FSTDs, including those allowing the devices to be kept as they are in their current use in training, testing and checking, without imposing any adverse impact.
Comments addressed the unclear transitional provisions for FSTDs qualified to multiple FSTD qualification types and levels.	A new provision in Article 10b covers FSTDs qualified to multiple FSTD qualification types and levels that simulate the same aircraft type. For such FSTDs (e.g. FNPT II MCC/FTD 2), there are two possible options: — Option 1 – keep the legacy FSTDs with both qualification certificates (no changes to the current use and credits); — Option 2 – on a voluntary basis, such FSTDs can be moved to the FCS framework, with only one FCS being determined. However, FSTDs that have more than one qualification certificate (e.g. FNPT II and FNPT II MCC) and simulate different aircraft (e.g. single-engine piston, multi-engine piston and generic twin-engine jet) must still have different qualification certificates for each simulated aircraft.
The alignment of proposed changes in the aircrew rules and CS-FSTD with the certification specifications and guidance material for simulator data (CS-SIMD) and the certification	EASA will propose amendments to CS-FCD and CS-SIMD, as appropriate, in order to ensure consistency across the regulatory framework proposed in this Opinion and associated AMC, GM, CS-FSTD Issue 1 and the affected

Comments on NPA 2020-15	How they have been addressed in the Opinion
specifications and guidance material for operational suitability data (OSD) flight crew data (CS-FCD) is unclear.	OSD regulatory provisions and specifications. For more information, please refer to the Opinion.
Comments on Part-FCL and Part-ORA, Subpart ATO	
The FCS concept as proposed in Appendix 9 was deemed too restrictive and inappropriate for future training innovations. — For competency-based training and assessment (CBTA), a competency-to-tool approach was not yet covered, only the task-to-tool approach; as the training objectives contained in CBTA programmes contain both, predominantly competencies but also the tasks supporting their development, a shift from the task-to-tool approach to the learning-objective-to-tool approach would be necessary. — Competency-based training programmes might, in the future, require new tasks not mentioned in Appendix 9. — Evidence-based training topics were not covered by Appendix 9. — Tasks for remote piloted aircraft were not covered. — Future tasks of training programmes for new/other aircraft categories were not covered.	In EASA's understanding, the task-to-tool and CBTA methodologies are complementary, as the first focuses on the determination of the suitability of an FSTD for certain training tasks, given the required minimum technical characteristics of the device and the identified training need, while the second focuses on the acquisition and observation of pilot competencies in the execution of a set of training tasks under well-defined conditions. The commonalities between the task-to-tool and CBTA approaches are the training tasks and instruction system design principles for training course design. Therefore, once the new FCS framework and the CBTA framework resulting from Subtask 2 of RMT.0194 become applicable, the competency-to-tool approach will be clearly set out from a legal perspective. Should the need for new training tasks arise, the applicable regulatory requirements will be updated accordingly. Future tasks for other aircraft categories should also be specified, but this is not within the scope of RMT.0196. According to AMC1 ORO.FC.145(d), as amended, for evidence-based training topics included in AMC2 ORO.FC.232, an FFS at level C or D should be used.
Comments argued that there was limited value in introducing an FCS concept with training matrices only for aeroplane type ratings (multi-	In the supporting AMC and GM to this Opinion, EASA proposes training matrices for both aeroplanes and helicopters.

Comments on NPA 2020-15	How they have been addressed in the Opinion
pilot aeroplanes (MPA) and single-pilot high-performance complex aeroplanes (SP HPCA)).	
Comments covered the inconsistencies in and immaturity of the training matrices. Further questions were raised regarding the process that was put in place to validate the assumptions and results of the training matrices.	The training matrices have been completely reworked. The training matrices in the new proposal were created by training experts who analysed each training task while working individually and without influence from others. The individual results were then included in a summary training matrix and, where conflicts emerged, an analysis of the differences and subsequent discussions were carried out. Ultimately, EASA reviewed all the proposed matrices independently to ensure that the fidelity levels proposed for each task and feature are technically sufficient for the execution of the training task, given the level of training and the underlying training assumptions, taking into consideration the technical requirements of CS-FSTD Issue 1. Where the assigned fidelity levels were not sufficient or exceeded the identified purpose of the task, EASA changed the fidelity levels. Additionally, EASA carried out a validation of the training course design principles with the training matrices, with the involvement of approved training organisations and operators for both aeroplanes and helicopters.
Commentators suggested creating a separate training matrix for single-pilot high-performance complex aeroplanes (SP HPCA).	EASA reviewed the proposal and concluded that the training for MPA and SP HPCA is based on the exact same training tasks and, therefore, cannot find a substantial reason to justify a difference between MPA and SP HPCA in terms of the devices to be used for training. From a broader perspective, the amendment of Appendix 9 to Part-FCL introduced with Regulation (EU) 2024/2076 aligns the requirements for MPA and SP HPCA regarding the training platforms to be used.
There were requests to define and classify virtual reality (VR) training as a type of FNPT training.	VR is not a type of FSTD, but a technology that may be used for training under specific conditions. Following the

Comments on NPA 2020-15	How they have been addressed in the Opinion
	qualification of VR FSTDs, EASA published the policies and principles for the qualification of such devices, which have been embedded in the draft CS-FSTD Issue 1.
The training matrices proposed in NPA 2020-15 did not promote the use of existing FSTDs like FTD 2 or FNPT II MCC that could be valuably used for SP HPA complex type rating training. With the proposed amendments in NPA 2020-15, most of the FSTDs currently used in approved SP HPA complex type training courses would not meet the fidelity level required in the matrix.	The use of FSTDs must be in compliance with the requirements of Section A of Appendix 9 to Part-FCL. The amendment of Appendix 9 to Part-FCL introduced with Regulation (EU) 2024/2076 aligns the requirements for MPA and SP HPCA regarding the training platforms to be used, allowing the use of FTD 2 devices for SP HPA complex type rating training courses.
Clarifications were requested on the extension of the task-to-tool concept to training other than type rating training, considering that NPA 2020-15 did not offer such training matrices.	For pilot training programmes other than type rating training (e.g. licence training, instrument rating training), the FCS framework is currently not applicable, as no training matrices have been developed to support its application. However, in order to allow the use of FSTDs qualified with FCSs in training other than type rating training, as well as in existing type rating training programmes or new training programmes that do not benefit from the application of the FCS framework, the proposed regulatory amendments establish an equivalence between FSTDs qualified with types and levels and FSTDs qualified with FCSs. Training matrices for ab-initio training have not been developed, as they are outside the scope of RMT.0196 Subtask 2. The future extension of the task-to-tool concept to other training types is currently not planned.
The training matrix in NPA 2020-15 was designed using a task-based approach, whereas modern training was founded on the principle of CBTA, which was promulgated as a single concept for all areas of training. Assigning required fidelities to tasks did not meet training needs, since the	In CBTA training, the focus is on the gaining of competencies as the observed outcome, which is achieved by combining a selection of identified training tasks in a training scenario under specified conditions. Therefore, the determination of minimum fidelity levels in the training matrix does not conflict with the future

Comments on NPA 2020-15	How they have been addressed in the Opinion
required competencies to master a specific task, especially during abnormal operations, might differ considerably between aircraft types.	application of a CBTA methodology. Training course designers should identify the areas where specific fidelities of an FSTD are needed, taking into consideration the objectives of the training.
The training matrix in NPA 2020-15 in relation to UPRT was in contradiction with CS-FSTD(A) – Issue 2, through which enhanced requirements for qualified training devices had recently been introduced. Simulator operators were now required to upgrade training devices with aerodynamic models and realistic simulation of buffet onsets (frequency and amplitude). This was in contradiction with the training matrix, which did not require any motion for UPRT.	The comment was accepted and changes have been introduced to ensure that an FCS for UPRT tasks meets the minimum equivalence for an FFS level C, as specified in point FCL.036(a).
Several training topics proposed in NPA 2020-15 required fully automated simulated air traffic control environment (SATCE), simulated air traffic control services that did not meet current industry standards. The majority of FSTDs were not equipped with this feature and retrofitting would have a substantial economic impact.	In the new proposal, there is no mandatory requirement to have SATCE installed on any FSTD.
Clarification was sought on the need to amend the existing type rating programmes to comply with the task-to-tool concept. Concerns were raised that this might lead to significant administrative efforts for the operator/ATO without substantial benefits.	In the new proposal, there is no need to amend existing training programmes.
References to an ESL were missing in points ORA.ATO.135(b) and ORO.FC.145.	Amendments to points ORA.ATO.135 and ORO.FC.145 were made to create a link with the ESL and to ensure that the assessment of the operator/ATO is based on the FSTD qualification certificate and the ESL.

Comments on NPA 2020-15	How they have been addressed in the Opinion
Comments on Part-ARA, Subpart FSTD, and Part-ORA, Subpart FSTD	
Comments noted an unclear link between the FSTD qualification certificate and ESL.	The Opinion proposes creating a strong link by specifying that both documents form the FSTD qualification.
It was proposed that the evaluation of the ESL form part of the initial evaluation procedure, as the ESL was an essential document forming part of the FSTD qualification.	The proposal was accepted. The Opinion suggests that the competent authority review the ESL as part of the initial, recurrent and, if deemed necessary, special evaluation.
Comments noted the unclear provisions on the tasks of the competent authority regarding the ESL.	The comment was accepted, and the Opinion clarifies the responsibilities of the authority and the organisation operating the FSTD regarding the ESL. The ESL is a prerequisite for the issuance of the FSTD qualification certificate and the competent authority must review it. In recurrent evaluations, the authority must review the ESL to determine if it accurately represents the FSTD qualification, basis, capabilities, equipment and specifications.
Clarity was requested regarding whether an ESL was to be developed for an FSTD or for an FSTD qualification certificate.	The Opinion proposes that an ESL is developed and maintained for each FSTD qualification certificate, as some FSTDs may have multiple FSTD qualification certificates.
Clarity was requested regarding when the organisation operating the FSTD has to submit the ESL to the authority.	The transitional provisions (amendment to Article 10b) require that an ESL is developed and provided to the competent authority for every FSTD qualification certificate. As regards the application process for the qualification of new FSTDs, it is envisaged that the ESL will be provided with Part A of the application process to facilitate the evaluation of the FSTD by the authority.
A proposal was made to allow for the possibility that an ESL could be accessible in electronic	The proposal was accepted and taken into account in the supporting AMC and GM, which clarify that the ESL and

Comments on NPA 2020-15	How they have been addressed in the Opinion
format.	the FSTD qualification certificate can be displayed either in hard or electronic copy.
Comments noted that there were no definitions of the terms 'validate' and 'verify' in the context of the ESL.	The terms 'validation' and 'verification' in the context of the FSTD are defined in Article 2 of the draft regulation.
The confusing and unclear use of the terms 'upgrade' and 'update' regarding FSTDs in the context of FCS framework was raised.	In the Opinion, the terms 'update'/'upgrade' in relation to FSTDs are noted to be obsolete and are replaced with the term 'modification'. The term is defined in Article 2 of the draft regulation and clear provisions on how to treat a modification from the authorities' and organisations' perspectives are added.
The use of the term 'type-specific FSTD' needed more clarification.	The term is no longer used in the Opinion. CS-FSTD Issue 1 specifies the meaning of the fidelity levels (specific (S), R, G, N).
Comments noted that new aircraft programmes were subject to compliance with OSD and CS-SIMD to determine the scope of necessary validation data. The NPA did not provide sufficient information on how to qualify an FSTD with an FCS using an interim qualification. Some stakeholders asked for a review of the concept of interim FSTD qualification in the context of the new CS-FSTD.	The comment was accepted. The existing provisions on interim FSTD qualification have been modified to address the FCS framework. In the event of the introduction of a new aircraft programme, the FSTD may receive an interim FSTD qualification, which will remain valid for no longer than three years. In such a case, this must be reported in the qualification certificate under each relevant feature (e.g. 'S interim' for the relevant feature). CS-FSTD Issue 1 provides further information on how interim FCSs can be achieved. The draft AMC to Part-ARA, Subpart FSTD, provide details on the process for qualifying FSTDs using an interim qualification.
Comments noted the unnecessary overheads created when requiring the operator to submit	The provisions for modifications (points ARA.FSTD.130 and ORA.FSTD.110) have been substantially revised to:

Comments on NPA 2020-15	How they have been addressed in the Opinion
an ESL to the authority for every change. Clarification was requested on the aspects of a change to the ESL that could result in a special evaluation. The draft amendments in NPA 2020-15 related to the management of modifications of FSTDs with FCSs were deemed incomplete. Several commentators requested a review and further clarifications.	— introduce clarity on the criteria for a modification to qualify as a major modification; — clarify the process to be followed by the authority and organisation in the event of a major modification; — clarify that it is the prerogative of the authority to decide whether a special evaluation is necessary; — clarify that the organisation operating the FSTD must validate any modification to the ESL and, in the event of a major modification that affects the ESL, submit the updated ESL to the competent authority.
Several commentators proposed an additional provision that the organisation operating the FSTD must submit an updated ESL to the competent authority if the ESL has been modified.	The comment was accepted. The Opinion proposes a new point in point ORA.FSTD.110, according to which the organisation operating the FSTD must validate any modification to the ESL and, in the event of a major modification that affects the ESL, submit the updated ESL to the competent authority.
Comments noted the unclear proposal on the type of evaluation (special or initial) in the case of a major change affecting the FCS. Many commentators required clarification on the type of changes affecting FCSs that would require a special evaluation and whether such changes would need to be approved by the authority. According to several commentators, not all changes to FCSs should require a special evaluation, and the conduct of a special evaluation should be optional.	The comment was accepted. The amendment to point ARA.FSTD.130 envisages that a competent authority verifies the compliance of a major modification with the qualification basis and, if deemed necessary, such verification may include a special evaluation of the FSTD. The intention is that the authorities decide on a case-by-case basis whether a special evaluation is necessary, considering the nature of the major modification. The supporting AMC and GM provide details on special evaluation considerations for major modifications of FSTDs with FCSs and some examples of cases where a special evaluation is appropriate.
The NPA proposed that the authority undertake an enforcement measure if an ESL was	The comment was accepted. According to the amendments to point ARA.FSTD.100, if the authority

Comments on NPA 2020-15	How they have been addressed in the Opinion
incomplete/incorrect, without providing an opportunity for the organisation to rectify it. It was not clear what 'incomplete ESL' meant or why the rationale for handling the ESL was so strict if the document was for information purposes only.	finds that the ESL contains inaccurate information about the FSTD, the authority raises the non-compliance and asks the organisation operating the FSTD to provide a corrective action plan and measures to rectify it. Only when the organisation fails to submit an acceptable corrective action plan to address a non-compliance, or to perform the corrective actions to the satisfaction of and within the period agreed by the competent authority, must the authority undertake enforcement measures. The term 'incomplete ESL' is no longer used. Clarity on the scope of the ESL is provided in point ORA.FSTD.120 and the supporting AMC and GM.
Several commentators asked for clarification of the reference to point ARA.GEN.350 in point ARA.FSTD.135, as it was unclear whether the authority could raise a finding to the organisation in case of non-compliance of the FSTD.	The comment was accepted and point ARA.FSTD.135 has been revised to distinguish two cases when the authority undertakes an enforcement measure: — an organisational non-compliance issue, in which case the authority must act in accordance with ARA.GEN.350; — a technical FSTD non-compliance issue, in which case the authority must act in accordance with ARA.FSTD.100 (request a corrective action plan, grant a period for rectification, assess the action plan and, if sufficient, accept it).
Several commentators requested changes to the FSTD qualification certificate as follows: — adding a revision number to reflect the changes; — clarifying in the instructions that different engine and equipment fits on one FSTD do not require separate qualification certificates; — clarifying in the instructions whether	The comment was accepted. The requested changes and clarifications are reflected in the updated Appendix IV to Annex VI (Part-ARA) 'Flight simulation training device (FSTD) qualification certificate'.

Comments on NPA 2020-15	How they have been addressed in the Opinion
separate qualification certificates should be issued for aircraft variants.	
Some commentators proposed that the FSTD qualification certificate include a reference to the ESL developed for that FSTD.	The proposal was not accepted, because the FSTD qualification certificate would then potentially be subject to several changes as a result of changes in the ESL. In order to avoid numerous changes, it is suggested that the qualification certificate does not make a reference to the ESL. Nevertheless, the link with the ESL is established by having a requirement for the organisation to develop and maintain an ESL for each FSTD qualification certificate.
Some commentators proposed that the instructions for the completion of the FSTD certificate provide clarity on cases in which a limitation reflected in the evaluation report would result in a limitation being included in the FSTD qualification certificate.	The proposal was not accepted. As the template for an evaluation report is provided at the AMC level, it is not deemed necessary to establish such a provision in the Opinion.
Some commentators proposed that the sections 'Additional capabilities' and 'Limitations' be removed from the FSTD qualification certificate and included in the ESL.	The proposal was not accepted. The Opinion still proposes retaining these sections in the FSTD qualification certificate because: — such capabilities (UPRT, MCC) should be granted in the qualification process by the authority and therefore reflected in the qualification certificate; — the limitations of the FSTD are also linked with the evaluation process and it is the prerogative of the competent authority to certify this.
Changes to FSTDs (airports, weather scenarios) had to be documented in the ESL and continually forwarded to the relevant authority. This was considered a substantial administrative burden for the FSTD operator.	Minor modifications (e.g. regular aeronautical information regulation and control 28-day cycle updates to flight management system, global positioning system, required navigation performance authorisation required, obstacle, terrain database, etc.) and visual database updates should not lead to a change to the ESL.

Comments on NPA 2020-15	How they have been addressed in the Opinion
	Only in the event of a major modification that affects the ESL must the organisation operating the FSTD submit the updated ESL to the competent authority.
The rules related to FSTD changes were spread over different regulatory provisions, which did not support ease of understanding for readers.	The proposal was accepted. With the new structure of the rules, there is a single provision on managing modifications for the authority (ARA.FSTD.130) and a single provision on managing modifications for the organisation that operates the FSTD (ORA.FSTD.110).

Overview of the main comments received during focused consultations

Following the analysis of the comments on NPA 2020-15, EASA substantially redrafted the regulatory material and discussed it with the Advisory Bodies and interested parties at focused consultation events in 2023 and 2024. Table 2 provides a summary of the main comments received on the regulatory material covered by the Opinion, and the EASA responses addressing them.

Table 2: Main comments received during focused consultations and EASA responses

Comments received	How they have been addressed in the Opinion
Comments on transitional provisions (draft Article 10b)	
Stakeholders sought clarification on the provisions related to the development of an ESL and its submission to the authority as envisaged in the draft transitional provisions (Article 10b). Questions were raised with regard to the proposed text stating that a competent authority replaces the FSTD qualification certificate with the new form and requests an ESL before the expiry of the one-year period during which the organisation operating the FSTD can develop and submit the ESL.	In the transitional provisions, it is clarified that the organisation operating the FSTD must submit an ESL to the authority in any of the following cases: — when applying for reissue of the qualification certificate; — when the FSTD is intended to be used in a new/amended training programme designed with FCSs; — no later than one year after the FCS framework becomes applicable (the rationale being that within a certain period all FSTDs, except BITDs, must have ESLs). EASA reviewed the cases in the regulatory material and deleted one case in which an ESL must be provided upon the request of the competent authority. This requirement was found to be more restrictive than the permitted timeline of one year after the applicability of the FCS framework becomes applicable and therefore was not retained in the final regulatory material.
Some stakeholders requested reconsideration of the draft text in the transitional provisions (draft Article 10b) that allowed a competent authority to unilaterally replace FSTD certificates with certificates in the new form. Clarifications were sought on the: — right of the organisation operating the FSTD to decline an FCS for an FSTD; — timeline for when the competent authority exchanges FSTD certificates for	Considering the comments, the transitional provisions (draft Article 10b) were amended to clarify that the authority replaces the FSTD certificate with the new form after having received and reviewed the ESL. Furthermore, an administrative deadline of 18 months after the rule becomes applicable is established to ensure the harmonisation and standardisation of the new FSTD qualification certificate form in EASA Member States. The Opinion (point (2)(c) of Article 10b) clarifies that, before reissuing an FSTD qualification certificate with an FCS, the authority must inform the applicant of the result

certificates in the new format.	of the re-evaluation. At that time, the organisation operating the FSTD can withdraw its application and decline the FCS for the FSTD.
Some stakeholders asked for information on the need to perform an FSTD evaluation when an FSTD moves from legacy to the FCS framework.	Evaluations are only needed if an FCS cannot be assigned or an evaluation is requested by the operator. In all other cases, evaluation is not necessary.
A few stakeholders proposed that an ESL is not required for BITDs, with the reasoning being that there was a very limited number of FSTDs in the EU (fewer than 10 BITDs).	The proposal was accepted and Article 10b has a provision to allow such a derogation for existing BITDs.
Comments on Part-FCL and Part-ORA, Subpart ATO	
Questions were raised on the missing equivalent FCS for FFS level B in point FCL.036.	Point FCL.036 clearly specifies that, when reference is made in Part-FCL to FSTD types and levels, the provision applies. As no reference to FFS level B is present in Part-FCL, there is no need to add such a reference. FFS level B devices can still be used as 'legacy' FSTDs and maintain the full training credit granted to an FFS.
Comments suggested adding an FTD 1 reference to point FCL.036.	The proposal was not accepted. FTD 1 would have an assigned FCS below the minimum FCS required for any training task under the task-to-tool approach. Organisations will have to decide whether they want to continue training on FTD 1 under the approved training programme or, where training benefit is expected, use such devices in an FCS-designed training programme after the device has gone through an evaluation and received an FCS.
Point FCL.036(b)(1) indicated that tactile hardware was required for FSTDs, but that this requirement was for S-level capability. However, commentators noted that there were a multitude of FSTDs that had G and R levels defined for this capability.	The existing requirements of CS-FSTD(A) Issue 2 and CS-FSTD(H) Initial Issue do not allow the qualification of touchscreen devices. In order to permit this in the future, the general requirements of the 'flight deck layout and structure' feature, at G and R fidelity levels, allow the qualification

It was unclear why FSTDs must have tactile hardware. It seemed to defeat the purpose of using the S/G/R philosophy to force the requirement to attain an S level for a specific feature and then rationalise how this forced requirement is not really forced in all cases. The requirement in point (b)(1) was too general and did not specify whether tactile hardware was required for some or all of the flight deck representation in order to use an FSTD with an FCS.	of touchscreen devices; at the S fidelity level, tactile hardware is required. According to the existing requirements, an FFS must be a full-scale replica of the simulated aircraft. Therefore, the 'flight deck layout and structure' feature would be at the S fidelity level. In general, in order to prevent the use of touchscreen FSTDs for ab-initio licensing training, point FCL.036(b)(1) has been created. Despite being restrictive in general, the wording allows the use of touchscreen devices for type rating training. The tables of equivalence in point FCL.036 must be used when FSTD types and levels are referred to in the regulation. However, Appendix 9 to Part-FCL never mentions FSTD types and levels, except for FFSs. Therefore, in light of the provisions of point FCL.036, the use of touchscreen FSTDs for type rating training is allowed, where permitted, as detailed in AMC3 Appendix 9.
The requirement in point FCL.036(b)(2) was too general and did not give any consideration to whether a particular task actually involved the use of the flight controls or could be conducted with the use of either autopilot or no flight controls at all in order to use an FSTD with an FCS.	The requirement has been clarified to specify that it applies to exercises involving manual flying.
The draft provisions allowing for the use of FSTDs in LAPL(H)/PPL(H) training require approval. This was found to be confusing, given that such training is provided in DTOs where there is no approval as such.	The amendments in points FCL.110.H LAPL(H) and FCL.210.H PPL(H) are revised to clarify that approval is not required for the entire LAPL(H)/PPL(H) training programme; rather, authorisation by the competent authority solely on the use of the FSTD during LAPL(H)/PPL(H) training is required.
Some stakeholders requested clarifications on the rationale behind FSTD credit being limited to dual flight instruction time and not being	EASA understands the hours referred to in the comment as follows: 45 hours of flight instruction time, 25 hours of dual flight instruction time and 10 hours of supervised

available for the residual 10 hours in LAPL(H)/PPL(H) training. In point FCL.110.H LAPL(H), no such distinction was made.	solo flight time. The residual is calculated as the difference between the first time and the second two. These 10 residual hours of training can be all dual flight instruction time, all supervised solo flight time or a combination of both. In the case of PPL(H), of the 25 hours of dual flight instruction, a maximum of 10 hours, under certain conditions, as specified in point (aa) of point FCL.210.H, may be conducted in FSTDs. The FSTD credit granted for the PPL(H) training course needs to comply with the relevant requirements of International Civil Aviation Organization Annex I. No such requirements exist for LAPL(H), as it is not an International Civil Aviation Organization licence.
SATCE should be reviewed and added as a mandatory element for new simulations in future. Present simulators should attempt to add SATCE to add realism to training. A request was made to include SATCE as an FSTD feature.	At the moment, EASA does not consider it suitable to include mandatory training requirements in Part-FCL for the use of SATCE for training, testing and checking. For this reason, SATCE is not treated as an FSTD feature. In CS-FSTD Issue 1, general requirements for SATCE are included. If SATCE is installed and is to be used, function and subjective testing of the FSTD must be conducted to ensure that SATCE supports the specific training tasks envisaged in an efficient and effective manner.
In Appendix 9, task 2.5.2 'engine failure between V1 and V2' still required mandatory testing on FFSs. This was often problematic for 'old' SP HPCA (e.g. Beech range). It was proposed to test this item on a lower-level FCS FSTD, equivalent to the current FTD level 2 / FNPT II. The same applied to all task 3.7 UPRT items. It was suggested that instead of 'FFS qualified for the training task only', a level of FCS FSTD should be indicated, allowing UPRT exercises to be carried out at a level of FSTD equivalent to the current FNPT II after checking that there was no negative training. Otherwise, operators of 'old' SP HPCA that did not have an	The proposal was not accepted. The requirements for such training tasks mandate the use of an FFS and have not been changed. Training tasks 2.5.2, 3.7.1 and 3.7.2 are safety critical and must be executed in an FFS, if available and accessible, as an FFS is the training device that can most adequately simulate the emergencies/events experienced in such situations.

available/accessible FFS would not be able to tackle the specific type of UPRT that concerned them.	
Paragraph 1b of Appendix 9 to Part-FCL stated that skill tests and proficiency checks must be conducted in an FFS. Stakeholders suggested updating the text to reflect that checks/tests should be completed in a device with an appropriate FCS for testing and checking.	The suggestion was not accepted. The skill tests and proficiency checks must be conducted in an FFS or FSTD with an equivalent FCS in accordance with point FCL.036.
Some commentators asked for the option to use a qualified other training device (OTD) in type rating training to be added. They proposed that the OTD column of the Appendix 9 table for helicopters be amended accordingly.	The proposal was accepted. The table containing the list of training tasks in Appendix 9 has been amended to allow, where suitable, the use of OTDs for the very initial stage of training on a task. However, OTD time cannot be considered FSTD time in accordance with point 1g of Appendix 9 to Part-FCL.
The changes in the Appendix 9 tables introducing a new column for OTDs gave OTD training a lot of emphasis, maybe unintentionally, as the column was empty for most of the exercises. In addition, the use of OTDs in Appendix 9 was not aligned with AMC3 to Appendix 9, which specifies certain FCSs for aircraft systems training (see, for example, the exercises under 3.4).	The existing structure of Appendix 9 was reviewed, as the difference between OTDs and FSTDs was not fully clear. Additionally, the proposed text clarifies the legal basis for the training credit to be granted to OTDs and FSTDs. For OTDs, there is no need to have an FCS. However, the training organisation should demonstrate the suitability of the OTD used as part of its training course approval.
Point 1g of Appendix 9 to Part-FCL stated that the training time completed on OTDs could not be counted towards the minimum FSTD training time specified in the relevant type rating training programme. However, it was unclear whether this meant that OTD training time could be counted towards the total training time or not. OTDs were also used in theory training, so this aspect should be taken into account too.	OTD time may be counted as part of the total training time. However, OTD time cannot be counted towards the minimum FSTD time requirements.
Comments on Part-ARA, Subpart FSTD, and Part-ORA, Subpart FSTD	

A question was raised with regard to draft point ARA.FSTD.100(b), where, with regard to recurrent evaluation, among the tasks for the competent authority, it was not mentioned that the authority was to verify the compliance of the organisation operating the FSTD with the applicable requirements. Was that intentional?	The competent authority verifies the compliance of the organisation only in the initial evaluation. The recurrent evaluation focuses only on the FSTD, whereas the organisation's compliance is subject to the oversight rules under point ARA.GEN.300.
Some stakeholders commented that there was a missing requirement in the hard law related to the obligation of the authority to assess the validation data that is used in the initial evaluation procedure. It was proposed that such a requirement be added.	The comment was accepted. Point ARA.FSTD.100 is updated in this context. As part of the initial evaluation, the authority assesses the chosen type of validation data and whether the chosen validation data is suitable to support each objective test. The proposed point ORA.FSTD.200 includes a requirement for the organisation to provide information on the chosen validation data as part of the application process.
The provision related to the transfer of the FSTD did not clearly address cases where the transfer involves several authorities. It needed to be ensured that the receiving authority was informed of the transfer and issued a new qualification certificate to the receiving organisation.	The comment was accepted. The new point ARA.FSTD.125(c) is created to ensure that the receiving authority is informed of the transfer and issues a new qualification certificate to the receiving operator.
Some stakeholders proposed that the ESL be an attachment to the FSTD qualification certificate.	The comment was not accepted. The ESL will not be an attachment, because it would not be approved as such by the competent authority. The responsibility for developing and maintaining the ESL lies with the operator and the competent authority must review, but not approve, it.
The rationale behind the proposal that an organisation operating a legacy FSTD be required to develop a procedure for an ESL (draft point ORA.FSTD.100(b)) was unclear.	The rationale is clarified in the text box related to the draft amendment to point ORA.FSTD.100. The rationale is that the ESL must be developed by the organisation operating the FSTD for any FSTD (legacy FSTD or FSTD with FCS). Therefore, the organisation is asked to develop

	a procedure for how the ESL is established and maintained.
The proposed text/criteria for a major modification of an FSTD were considered too broad by the Advisory Bodies and it was felt that almost every modification could be considered a major one.	The comment was accepted. The criteria in the amendment to point ORA.FSTD.110 have been redrafted to establish a demarcation line between major and non-major modifications. It is proposed that a major modification is a modification that affects (1) the FSTD qualification certificate and (2) the FSTD qualification, thus affecting training, testing or checking.
Several stakeholders gave positive feedback on the proposed rule on the management of a major modification without prior approval.	EASA welcomes the feedback.
Some stakeholders proposed that, for new FSTDs that will be qualified in accordance with CS-FSTD Issue 1, the submission of an ESL to the authority should happen at a very early stage in the application process (point ORA.FSTD.200).	The proposal was accepted. The ESL is requested in Part A of the application process.
Some stakeholders asked EASA to reconsider the frequency of conducting functions and subjective tests contained in the master qualification test guide (MQTG). The rationale voiced by organisations that operate FSTDs was that this cycle was unproductive (four fly-outs over a 12-month cycle) and deemed to add minimal value for both the operator and the competent authority. The number of such tests performed on a quarterly basis had been shown to lead to unnecessary FSTD resource utilisation.	EASA accepted the proposal and reviewed the cycle in point ORA.FSTD.105 so that the functions and subjective tests are to be conducted progressively over a 24-month cycle.
Clarifications were sought on the record-keeping for superseded versions of the MQTG and ESL, as this was not clarified in the proposed text.	The comment was accepted. Point ORA.FSTD.240 has been modified to address the comment. The superseded versions of the MQTG and ESL are retained for the duration of the FSTD's lifetime.

Comments on Part-ORO, Subpart FC	
As regards point ORO.FC.145, it was proposed that the training programme provide the flexibility for the operator to choose which tool is best suited to the task at hand.	The proposed text in point ORO.FC.145 allows the operator to use an FSTD that is appropriate for the tasks (exercises/manoeuvres) to be covered in accordance with the relevant training and checking programme or syllabus.

Overview of the MAB feedback

In accordance with Article 6(9) of Management Board Decision No 01-2022, EASA sought advice from the Member States Advisory Body (MAB) on the draft Opinion. Table 3 gives a summary of the main comments received from the MAB.

Table 3: Main comments received from the MAB

Comments received	**How they have been addressed in the Opinion**
Clarification was sought on the proposed text (Article 10b, paragraph (3)) in relation to a situation in which an FSTD is qualified to multiple FSTD qualification types and levels and the Member State is required to merge the FSTD qualification certificates into a single certificate with an FCS. It was not clear whether this requirement would lead to a combination of FSTDs simulating different types or groups of aircraft. The commentator expressed concern that merging, for example, single-engine pistons, multi-engine pistons, single-engine turbines, multi-engine turbines, small jets and medium jets could lead to software glitches and, eventually, negative training.	There is a misunderstanding of the intention of the rule. The point refers to FSTDs that are qualified to multiple types/levels (e.g. FNPT II MCC / FTD) for the same simulated type of aircraft. For greater clarity, the text has been revised.
Clarification was requested on the text proposed in point FCL.110.H LAPL(H) regarding the FSTD representing the type of helicopter that is to be used for the skill test. It was not clear how this FSTD could be determined based on the FCS	Clarification is provided in the supporting AMC2 FCL.110.H LAPL(H).

features and fidelity levels.	
Proposals were made to discontinue using the term 'FFS' in Appendix 9 to Part-FCL and replace it with 'an FSTD with a suitable FCS'.	The references to FSTD types are kept in Part-FCL due to legacy FSTDs.
It was not clear whether, in the context of the FCS framework, a separate FSTD certificate would be issued for each simulated type or group of aircraft, or one certificate would be issued combining several groups/types (e.g. single-engine piston, multi-engine piston, single-engine turbine, multi-engine turbine, small jet).	EASA has added the new point (c)(1) to the instructions for the issue of the FSTD qualification certificate in Appendix IV to Annex VI (Part-ARA) to clarify that a different certificate must be issued for each FCS.
Regarding the special conditions for FSTD qualification, a comment was raised that the safety assessment should not be required and that the special conditions should demonstrate that at least an equivalent level of training fidelity has been reached.	With the special conditions, an equivalent level of safety should be demonstrated through an assessment. An equivalent level of training cannot be the ultimate objective, as the safety of the operation of an aircraft should be the ultimate objective. Furthermore, establishing an equivalent level of training is impractical, as the training depends on the objectives associated with each training task, which may differ depending on a number of factors (e.g. aircraft type, organisation). Furthermore, the special conditions cannot prescribe any training requirements.
A request was made for EASA to plan to provide support for the training of organisations and national competent authorities on the implementation of these new provisions.	EASA plans to initiate an implementation support task (please refer to Chapter 6 of the Opinion).

