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European Aviation Safety Agency

Discussion on the impact assessment of the RMT.0196 Task Force Training-FSTD Matrix / Methodology

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Challenges in the current environment

Cause

- Discrepancies between CS-FSTD, capabilities of the FSTD (F&S table) and Part-FCL
- Lack of recognition/crediting of new device capabilities in the training

Challenges

- Overcome discrepancies between training tasks and FSTD capabilities
- Provide more flexibility in using new device capability for training credits

Consequences

- Insufficient utilisation of existing and future device capabilities

Objectives

Overall objectives

- Enhance the link between training and FSTDs, while respecting the principle that training objectives/ tasks dictate the tools
- Foster innovations in the regulatory environment

Operational objectives

- Increase the granularity of FSTD fidelity levels
- Better usage of available FSTD capabilities in fulfilling training tasks
- Ensure that the regulatory framework allows inclusion of new training tools in a more expeditious manner

Policy options

Policy option	Title	Description
Option 0	No policy change	The challenges remain.
Option 1	FSTDs meet existing or future training needs while **retaining** the current baseline FSTD qualification levels	Training dictates the training tools. The device qualification includes the outcome of the device evaluation against 12 fidelity features (DNA). The current baseline FSTD qualification levels (FFS, FTD, FNPT) are kept. ATO can propose to the competent authority which device could be used for which part of the training depending on the capabilities needed to achieve the training objectives. The scope of the training refers to type rating and ORO.FC training.
Option 2	FSTDs meet existing or future training needs while **abandoning** the current baseline FSTD qualification levels	Same as Option 1, however the classification of the FSTD qualification levels (FFS, FTD, FNPT, BITD) will be abandoned. The devices are qualified **only** according to the 12 FSTD simulator features.

Impacts of Option 0

- **Safety**
  - Safety level is maintained
- **Economic**
  - Inefficient use of FSTD devices due to the disconnect between the training and FSTDs.
  - Not cater for new technologies and improvement of FSTDs. Consequently, additional innovative capabilities are not recognised in training.
  - Some training needs to be delivered on the aircraft if FFS does not exist.

Impacts of Option 1

Benefits	Costs
Safety: Improve safety levels (mainly for single pilot complex airplanes)	- Costs for the FSTD operators to perform an evaluation of the devices (might be in conjunction with the recurrent evaluation) - Workload/costs for the NAA to train inspectors and to evaluate, qualify and re-issue certificates for all existing ca 1400 devices - Costs for ATOs to update training programmes/objectives
Economic: - Cost savings for type rating and ORO.FC training (simulator cost saving and travel cost saving) - Reduction of the training cost - Cater for innovation driven additional FSTD capabilities and credits for training - In line with ICAO 9625 principles	
Social: Exposure to more training for pilots due to less expensive training devices	

Impacts of Option 2

Benefits/positive impact	Negative impacts
Same as Option 1	- Diversions from ICAO 9625 and FAA Part-60 due to abandoning the level specification on the qualification certificate - Potential adverse impact on BASA for FSTD

Questions and information

- What would be the investment/costs of NAAs to implement Option 1 /Option 2?
- What would be the costs of the ATO/FSTD operators to implement Option 1 and Option 2?
- How much would cost type rating and ORO.FC training per pilot under Option 1/Option 2?
- How much more training sessions could be provided as compared to the current situation?
- How much cost savings (simulator/travelling) would be gained for type rating and ORO.FC training?
- What would be the impact to the FSTD manufacturers/operators for new FSTD to implement Option 1/Option 2?

*Stakeholders are invited to comment on the proposed impact assessment and to provide quantitative information to support the analysis by **15 December 2018**.*

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Thanks for your attention

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