

PANEL DISCUSSION

“USE OF THE (OSD) DATA: MANDATORY VS NON-MANDATORY ITEMS”

QUESTIONS TO ATO's

1°) How does an ATO integrate the mandatory vs non-mandatory training items in the training programme ?

At first, it is very important that an ATO be aware that an OSD is composed of mandatory training items and non-mandatory training items: at this early stage of the introduction of OSDs in the training programs (we are at less than 4 months from 18 December 2017), I am not convinced that all European ATOs are aware of that.....

Mandatory training items are essentially (but not only) composed of prerequisites, TASE as well as minimum hours for the flight training and the theoretical knowledge instruction. These are the key points which have to be taken into account when considering the compliance of a training program with an OSD. Non-mandatory items can only be optional as they are only considered as recommended.

As the non-mandatory elements of an OSD have a level of “AMC”, and the mandatory element a level of “rule” (see GM No 3 to Part 21.A.15(d) OSD content) , who is in charge of the acceptance of AltMocs? NAA or EASA? As NAAs are not involved at all in the OSD process, this acceptance should have to be delivered by EASA.

With the revisions of the OSD-FC documents, integration of mandatory items or non-mandatory items should be considered by the ATO as a major or a minor change (to be discussed.....) and defined as such in its management system (see ORA.GEN.130 and ARA.GEN.310 b).

2°) How is this documented and implemented in training ?

No later than the latest of the two dates (18 December 2017 or date of issuance of the OSD + 2 years). When the OSD becomes mandatory, the ATO has to get an approval of its revision of the training program including at least the mandatory elements of the OSD-FCD.

All instructors of the ATO have to be trained on the content of the OSD-FC document. This has to be clearly documented in the instructor files.

It can be envisaged that:

- the trainee file clearly indicates that the trainee has been made aware of the mandatory elements of the OSD-FC document, signed by the trainee and recorded.

3°) How are TASE items documented and identified in the training programme and how are those items applied in training ?

TASE items have to be clearly identified in a training program. Most of the time, a training program contains a training plan with some chapters (aim of the training program, prerequisites, credits from previous experience, training syllabi, timescale and training program....). A TASE chapter should be added including a copy-paste (or extract) of the OSD document. Then, in the training program itself, when addressed in the flight training exercises, where applicable, a particular TASE could be identified with a special sign (e.g: an asterisk).

4°) How are changes to the OSD reports / updates controlled and incorporated in the training programmes ?

Monitoring of regulation updates implemented by the ATO required (by ORA.GEN.200 a-6 and ORA.GEN.210 b) to ensure that the ATO always remains in compliance with the applicable requirements) should clearly include the applicable OSDs and their revisions. So, OSD reports / updates or revisions have to be controlled by the monitoring of regulations updates implemented by the ATO.

As soon as a revision of the OSD is issued, it has to be considered by the ATO for the drafting of a revision of the training program. Then, 2 cases may apply:

- the revision of the OSD document doesn't imply a revision of the training program;
- the revision of the OSD document requires a revision of the training program by the ATO. In this case, as far as I know, there is no timeframe defined by the regulations between the date of issuance of the OSD revision and the submission for approval of the revision of the training program by the ATO to the regulatory authority.

QUESTIONS TO AUTHORITIES

5°) How do Competent authorities ensure that the training programmes are compliant with the regulation and the content of the OSD report ?

Regulatory Authorities should require (from the ATOs) training programs clearly declared compliant with the latest revision of the OSD. Revision number of the OSD-FCD document should be clearly indicated on the first page of the training program as well as on the Compliance Matrix issued by the ATO for each training program and automatically communicated to the Regulatory Authority with the draft training program.

2°) Then a complete review of the draft training program has to be conducted by an FCL expert;

3°) The approval is released as soon as the comments raised during the review (if any) are taken into account and the training program updated.

6°) Accessibility to the OSD reports, would they have full access to the OSD reports and eventually updates ?

It is a major concern to be discussed because it is of a very great importance that Regulatory Authorities have access to the latest version of the OSD report for the review of the training program submitted for approval.

For a regulatory Authority, there are at least 2 ways to get the OSD document:

- the OSD document is communicated by the ATO attached to the draft training program submitted for approval;
- the OSD document is communicated to the Regulatory Authority further to a request sent by e-mail to the address mentioned on the "list of OSD TC-STC holders" available on the EASA website.

7°) How to handle a situation where the ATO doesn't have the OSD report, and the authority has the report and the training program not compliant ?

As far as I know, this should only occur when the ATO doesn't operate the aircraft. In this case, it may happen that a TC holder or an aircraft manufacturer doesn't want to provide the OSD document to company/organisation which doesn't operate its aircraft.

In this case, this should be considered as a non-compliance for the ATO if it cannot get the OSD document via the airline subcontracted to conduct the base training.

Consequently, for aviation safety reasons, TC holders or aircraft manufacturers should be encouraged to promote the OSD documents and to provide them to the ATOs. The fact that an aircraft manufacturer doesn't want to sell the documents to an ATO should be considered as a non-acceptable safety-risk.

Additional questions to ask during the panel discussion or during the Conference:

1°) How to deal with SOE (Supervised Operating Experience) aspects quoted in OSD ?

On the basis of FCL.720.A.g, since SOE is not part of the training programme, we (DGAC France) consider that any SOE indicated in the mandatory part of any OSD is automatically and immediately applicable from date of issuance of the OSD (whatever is the date of approval of the type rating programme). Is this reading of the rule confirmed by EASA ?

2°) It is mentioned in some OSD-FC documents that pilots obtaining an initial type rating on an aircraft without previous experience on a turbo-jet, pressurised turbo-prop, or multi-engine turbo-prop aircraft must receive a specific number of hours of LIFUS / SOE.

- How to decide SOE content for pilots with previous experience on pressurised turbo-prop, or multi-engine turbo-prop aircraft ?
- How to take credit for SOE performed from another type of HPA or complex HPA ?

3°) some OSD reports are totally inapplicable: lack of suitable training devices (e.g: BE200 with Proline 21, only 1 FFS in Wichita) because the OSD reports are not considering FSTDs other than FFS. This is very restricted for aircraft such as HPA and HPAC aeroplanes (see my presentation about HPC aeroplanes on Wednesday morning). What can the ATO and NAA do for that ?

4°) Reminder for the ATOs

ORA.GEN.160 Occurrence reporting

(b) Without prejudice to paragraph (a) the organisation shall report to the competent authority and to the organisation responsible for the design of the aircraft any incident, malfunction, technical defect, exceeding of technical limitations and any occurrence that would highlight inaccurate, incomplete or ambiguous information contained in the operational suitability data established in accordance with Commission Regulation (EU) No 748/2012 or other irregular circumstance that has or may have endangered the safe operation of the aircraft and that has not resulted in an accident or serious incident
