

# Important questions from ATOs:

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- How will ATOs learn about new or amended OSDs and which timelines apply for their implementation?
- How will ATOs stay enabled and motivated to develop more efficient, effective or target population focused training and methods?
- How is pan-European standardisation of NAAs regarding the implementation, interpretation and application of OSD ensured?

- How can we clarify and improve the interfaces between the NAAs and ATOs governed by Reg. Aircrew, OEMs and EASA governed by Part 21 AND the cross-sectional interface between all stakeholders?
- How can we avoid a “Monopoly” of OEMs for training content and methods as well as development thereof which may result from their ownership of OSD?

- Is EASA aware of the fact, that OSDs partly but heavily interfere with ATO's didactic and pedagogical competence regarding training (e.g. 9x3 hours; why not state 27 hours?)
- Is EASA aware of the fact, that OSD partly describe training devices to be used, that are not defined by CS-FSTD?
- Is EASA aware of the fact, that it is partly unclear, if hours are meant "per crew" or "per pilot"?

# ATO's Questions cont.:

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- Is EASA aware of the fact, that OSD are in some cases in conflict with Aircrew Regulation hard rules (e.g. TRI-extension to another type)

# Thank You!

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## Discussion and Comments welcome!

# Supplemental issues:

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- Short-term, Medium- and Long-term measures
- Risks and Benefits
- ATO Requirements
  - Part 21.A.15(d) and related GM (only EASA/OEMs)
  - Part 21.A.62 (availability of and access to OSDs)
  - FCL.710(a)
  - FCL.720.A
  - FCL.725(a)
  - FCL.915(d)

# Legal references for ATOs like LAT:

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- Part 21.A.15(d) and related GM (only EASA/OEMs)
- Part 21.A.62 (availability of and access to OSDs)
- FCL.710(a)
- FCL.720.A
- FCL.725(a)
- FCL.915(d)
- FCL.910.TRI(b)
- ORA.ATO.125(b)
- AMC2 ORA.ATO.125