

Questions and answers related to FCL/ OPS regulation

Question number	Question text from participants to the conference related to FCL regulation	Answer from EASA	EASA Focal Point
1	If training from one variant to another is not evaluated (indicated by a dash) how is the operator required to deal with this?	If there is no OSD or mandatory training, alternative training can be arranged in coordination with the competent authority and the operator. If the OSD is mandatory and the specific differences training has not been evaluated, the variant training is not allowed.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
2	Please more details on the requirements for additional training for pilots who did a TR before OSD: how is it possible to check the differences?	Operators must perform a gap analysis to ensure that at least the mandatory elements are included in their FC/CC training and checking programmes. If there is no evidence that all mandatory elements have been delivered (e.g. new type-rated pilots joining from another operator), the affected pilot shall receive the relevant training before 18 Decemembr 2017 or 2 years after the approval of the OSD.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
3	Having analysed & filled a gap between existing TRs & mandatory OSD elements, by including in recurrent training, how do we demonstrate this to our authorities?	The training programs shall reflect the gap analysis outcomes and refer to the relevant OSD documentation (including version and date). The operator shall develop a system to verify that the OSD initial and recurrent training and checking provisions are incorporated in the manuals.	<a href="mailto:Air_ops@easa.europa.eu">Air_ops@easa.europa.eu</a>
4	emphasis lies on the first certification of an FSTD. Does that mean a second device from a diff. OEM can only be certified after the certification of the first one is finished?	This assumption is correct. From the OSD perspective one purpose of the first FFS (FTD) evaluation for a new type of aircraft (date still to be determined) is to get final confirmation that the Validation Data Roadmap (VDR) provided by the aircraft Original Equipment Manufacturer (OEM), the Type Certificate holder, is suitable to support the objective qualification of the training device. This will be approved by the competent authority (EASA via TCDS). Unless there is a reason to change this VDR (e.g. due to modification of the aircraft), this VDR will then be the basis for all FSTD manufacturers building an FSTD for this type of aircraft. If others than the TC holder would like to provide an alternate VDR for the same type of A/C the Supplemental Type Certificate (STC) process under Part-21 has to be applied. This means that more than one approved VDR might be available for the same type of A/C, but at least one must be available which is – if evaluated with positive result - when the first qualification of an associated FSTD is finished.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
5	Manufacturers do not intend their example training footprint to be prescriptive. Why are EASA making them so by giving them formal AMC status?	The status of AMC is the result of the consultation of the proposals in NPA 2009-01 and further explained in Opinion 07/2011. The OSD requirements have been developed across a length of time with the involvement of affected stakeholders. The decision to give the "non-mandatory" elements the status of an AMC was taken during the development of the rule and published in opinion 07/2011, where a rationale was provided. Organizations can deviate from the relevant AMC to the Aircrew Regulations via an AltMoC and an assessment was performed at the time of the opinion in this respect. The NPA 2009-01 and the Opinion 07/2011 are publicly available.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
6	@EASA, is it an option to make the course footprints within OSD GM in stead of AMC?	Please refer to question number 5 above.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
7	Recognising Mr. Leoff's valid questions on OSD requirements with AMC status: Are ATO's required to follow AltMoC procedure through Authority or manufacturer?	Please refer to question number 5 above.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
8	Would it be possible to have a list of approved altMOC/or other approved means of complying with OSD AMC?	The competent authority should publish a list of the approved AltMoCs. EASA also publishes a list with AltMoC references that have been notified to the Agency. There is no specific process to segregate the OSD related AltMocs.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
9	How will the KSA100 be implemented into the training syllabus?	The latest proposal of KSA100 already includes some practical aspects within the theoretical ground instruction. The principles of competency-based training, in line with KSA 100, will be integrated throughout the practical training in due course.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
10	How will the KSA100 be implemented during practical flight training?	Please refer to question 9 above.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>

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11	EBT Recurrent Training recommend 48 hours in FSTD within 3 years cycle. Will this become regulation?	<p>Not foreseen for the moment. EASA will propose a "performance base rule" where possible, meaning less prescriptive and more based on demonstration of performance.</p> <p>However EASA intends to clearly specify in AMC that there should be at least 4 simulator session a year. The time of the simulator sessions varies between 3-4 hours per session. This results in a 3-year cycle with a total session duration of 36 to 48 hours.</p> <p>Currently the EBT is implemented as one of the recurrent training paths in Air Operator Training. Future rulemaking tasks will address initial training.</p>	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
12	What will be the minimum FSTD qualification level required to train APS MCC? FNPT II MCC only or FNPT II MCC + FTD2 (related to the type specific) ?	The latest draft proposal, which is subject to change, states 'the FSTD used is type-specific, and additionally equipped with a visual system that provides at least 180° horizontal and 40° vertical field of view. An FNPT II MCC, that has a similar visual cueing system to the above, or is approved for MCC in accordance with FCL.735.A may be acceptable provided that the device is representative of the same class of multi-pilot, multi-engine aeroplane specified in this paragraph in terms of passenger load, mass and performance and equipped with equivalent aircraft systems and avionics functionality.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
13	Can we please extend the deadline for commenting in NPA 2017-13?	Extensions may be requested to EASA through the advisory bodies representatives.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
14	Does the FNPT2 needs a new certification when NPA2016-16 becomes an AMC? (Some columns have a NO and should be a YES to be able to be used for an OPC)	We understand the question refers to both NPA 2017-13 and 2016-16, and in particular the FSTD training matrix in the context of the newly proposed alternative APS MCC. The matrix only captures existing courses. At this stage EASA does not believe that an FNPT II needs a new certification.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
15	Before discussing advanced, may we update AB INITIO training.	The details of the Ab Initio training are discussed in the appropriate forum such as the STeB (Stakeholders Technical Advisory Body). EASA foresees a new project on introducing competency-based training for all licences and ratings to commence by the end of 2018. The project will ensure alignment of KSA100, APS MCC and EBT to ensure a holistic approach to pilot training.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
16	Can you show where list of OEM's are located on EASA web page?	<a href="https://www.easa.europa.eu/document-library/operational-suitability-data/osd-contact-list">https://www.easa.europa.eu/document-library/operational-suitability-data/osd-contact-list</a>	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
17	Is there any difference between the kind of data provided previously in the OEB and the current OSD.	The OEB did not contain mandatory / non-mandatory data. The OEB was developed to complement the JAA regulatory framework, the OSD is adapted to EU regulations.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>
18	#EASA, will all these questions here on slide.com will be answered and added to the meeting minutes?	There are no meeting minutes for a conference. Slido questions answered above.	<a href="mailto:fcl@easa.europa.eu">fcl@easa.europa.eu</a>