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The Replacement to Flight Simulation Training Device (FSTD) Fixed-Wing User Approvals

This Information Notice contains information that is for guidance and/or awareness.

Recipients are asked to ensure that this Information Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	Not primarily affected
Air Traffic:	Not primarily affected
Airspace:	Not primarily affected
Airworthiness:	Not primarily affected
Flight Operations:	All aeroplane AOC holders; Fixed-wing Flight Simulation Training Device (FSTD) User Approvals Holders
Licensed/Unlicensed Personnel:	Not primarily affected

1 Introduction

1.1 Background

- 1.1.1 Flight Simulation Training Device (FSTD) Standards issues User Approvals typically to Approved Training Organisations (ATOs) and United Kingdom Air Operator Certificate (AOC) holders, who seek licensing and/or operational training, testing and checking credits, when using a qualified FSTD in lieu of an aircraft. The requirement for the User to gain such an approval originated in legacy documents JAR-FSTD A (JAR-FSTD A.001) and EU-OPS (OPS1.005 (d)).
- 1.1.2 JAR-FSTD A was superseded by the implementation of the European Union / European Aviation Safety Agency (EU/EASA) Aircrew Regulation where the requirements for FSTDs are documented in Part-ARA, Part-ORA and CS-FSTD A. One consequence of that change (from JAR to EASA) was that the requirement for a User to gain specific approval to use a qualified FSTD was removed.
- 1.1.3 Furthermore EU-OPS will be superseded when the UK CAA implements the EU/EASA Air Operations regulation, namely Part-ARO and Part-ORO, in late October 2014. One consequence of this change is that the requirement for a User to gain separate approval to use a qualified FSTD has also been removed. After that date, approval to use qualified FSTDs for operational credits will be effected via approval of amendments to the AOC holder's operations manual, Part D (Training), as detailed in the paragraphs below.

1.2 Current Legislation

1.2.1 Part-ORA (ORA.FSTD.100(b)) states that 'If the applicant is the holder of a qualification certificate issued in accordance with this Part, the FSTD specifications shall be detailed:

- (1) in the terms of the ATO certificate; or
- (2) in the case of an AOC holder, in the training manual.'

The CAA has interpreted this, in conjunction with other National Aviation Authorities (NAAs), as the FSTD Air Crew 'Licensing credits' are to be shown in an ATO Certificate and the FSTD 'Air Operations credits' are to be shown in Part D (Training) of the Operations Manual, as applicable to the Organisation's status, i.e. as an ATO, an AOC, or both.

1.2.2 In addition, Part-ORO (ORO.FC.145), Provision of training, states in paragraphs (c), (d) and (e) that:

- '(1) Training and checking programmes, including syllabi and use of individual flight simulation training devices (FSTDs), shall be approved by the competent authority.
- (2) The FSTD shall replicate the aircraft used by the operator, as far as practicable. Differences between the FSTD and the aircraft shall be described and addressed through a briefing or training, as appropriate.
- (3) The operator shall establish a system to adequately monitor changes to the FSTD and to ensure that those changes do not affect the adequacy of the training programmes.'

2 Scope

2.1 The CAA implemented the Aircrew Regulation in September 2012. As a consequence Organisations have been progressively issued with an ATO Certificate that details the approved training courses and the FSTDs approved for use within each course. This is a separate process conducted through an assigned Licensing Inspector.

2.2 Part-ORO is not being implemented by the UK CAA until 28 October 2014 and therefore EU-OPS still applies. Consequently, a User Approval is still needed unless only licensing items are being sought (as they are shown on a given ATO Certificate).

2.3 After 28 October 2014, the CAA will no longer require a specific User Approval for airline Operators but will require the airline Operator to assess a device's suitability in supporting the crew training, testing or checking requirements of Part-ORO through its Operations Manual, Part D (Training).

2.4 An Organisation's Compliance Monitoring System in conjunction with the Crew Training Postholder/ Type Rating Instructor (TRI) / Type Rating Examiner (TRE) should assess the device and its Qualification Certificate against the type operated, so that there is an ongoing auditable process to ensure suitability for use. A device's Qualification Certificate provides information in tabular format, which only gives an indication of its potential capability. It does not mean that the device is fit for the purpose of the training stated. Any indication in an FSTD qualification certificate under 'Guidance information for training, testing and checking considerations' has to be cross-checked with the applicable requirements of Part-FCL, Part-ORO or any other regulation relevant to the training course to be provided before considering any training, testing and checking on the device.