Federal Register
Department of Transportation - Federal Aviation Administration
Docket No. FAA - 2002 - 12461
Flight Simulation Device Initial and Continuing Qualification and Use

1. The FAA initiative to amend the regulations for Flight Simulation Devices (FSD) qualification is very much appreciated. The proposal takes care of the legal concern that regulations in this area have to have a mandatory basis (which is not ensured in the existing AC system) and it concentrates all related material in one document - it even adds a new part covering helicopter FTD. It has to be accepted that this proposal does not address the latest modifications applied to the ICAO Manual covering the qualification criteria for flight simulators. It is understood, however, that this new kind of regulation will allow a more flexible updating process in case of a 'good cause'.

2. It is noted that a new term 'Flight Simulation Device' is being introduced. An opportunity for harmonisation of terms with the JAA may have been missed. Whereas the FAA term FSD is missing the training component, the JAA term STD is missing the flight component. In case an extension to an acronym with 4 letters could be acceptable, such a device could be called FSTD (Flight Simulation Training Device).

3. The question may be asked why the term 'recurrent evaluation' is sometimes exchanged against 'continuing evaluation'.

4. It is noted with appreciation that the FAA intents to introduce a mandatory Quality Assurance Program (QAP). It is proposed to build such a QAP to a full Quality System (QS) and to add those components as they are found in the required JAA QS.

5. It is still difficult to understand why an individual of an FSD user organisation, which does not (necessarily) owns the FSD, would be responsible for the quality of the FSD and not the FSD operator. It is understandable that the 'sponsor' (as main user of the FSD) will have a high interest in the top quality of the FSD, however, there may be always additional FSD users. It may also be a bit difficult as sponsor to exert proper supervision over the FSD operator's organisation and to give proper advise, which then would be followed as requested.

6. It is not understood why a 'Statement of Qualification' (could it also be called 'Qualification Certificate?) contains topics for which an FSD <u>is not qualified.</u> Why not list all topics for which an FSD <u>is (only) qualified?</u>

7. It is understood that the 'net effect' of this new regulation will eliminate the FS qualification Level A and that the remainder of this Qualification Level will enable FSD operators to requalify the FSD either to an FTD 6 or an FS Level B?

8. Will the preference to use an FSD instead of an aircraft be made mandatory by this amended regulation?

Dietrich Otto
Joint Aviation Authorities
Operations Division

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