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3425 Hidden River View Road, Annapolis, MD 21403-5025 (410) 267-9898 FAX: (410) 267-9898
Email: Al.Gleske@flightsafety.com

Elmer G. Gleske
Vice President
Governmental Affairs

November 24, 2003

Mr. Nicholas Sabatini
Associate Administrator for Regulation and Certification, AVR-1
Federal Aviation Administration
Washington, DC 20591

Via Facsimile: 202 267-9675

Dear Mr. Sabatini:

This is a request for your support to keep the issue of describing the technical standards and approval criteria for the level 1, 2, and 3 Flight Training Devices (FTDs) within the proposed Part 60.

FlightSafety International has been an active participant in the Part 60 Aviation Rulemaking Committee (ARC) since its inception earlier this year and is pleased with the results of the collective efforts of the committee. The changes that have been made to the original Part 60 language have been in the best interest of pilot training and air safety. Each member of the ARC has a personal perspective and an interest in the impact that Part 60 will have on their particular training application and yet we have been able to find a reasonable compromise on each issue without over emphasizing or down playing any individual area of concern.

We regret that the issue of keeping Level 1/2/3 FTDs under Part 60 does not fit with the previous success formula of the ARC. The reason FSI believes Level 1/2/3 FTDs should remain in Part 60, is because all training equipment should be under one standard and one rule. The National Simulation Program Manager (NSPM) has suggested Levels 4/5/6 FTDs should meet a consistent standard; we think Levels 1/2/3, as well, should meet a consistent standard within the training industry. FSI has observed that standards were generated under interpretation at the local level using AC 120-45A, Airplane Flight Training Device Qualification, during the AC's existence over the past thirteen years.

FSI believes now is the time for all simulation equipment that is used to train pilots or offer credits for training or checking to be included in one rule and the technical capability be evaluated and approved by one FAA authority. The credit given and the maneuvers approved in each level of Flight Simulation Training Device (FSTD) should meet a consistent standard for all pilot training entities under Part 60.

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It has been stated by the FAA that the pilot training equipment should not be regulated by Advisory Circulars. Therefore, including Level 1/2/3 FTDs under Part 60 will help resolve this matter and not cause a further delay in needed and consistent regulatory guidance.

It is our opinion that the Part 60 ARC is the appropriate forum to hear all inputs and find a reasonable compromise on any disagreement with these issues. AFS-800 and all other interested parties should be encouraged to participate in the ARC deliberations on Level 1/2/3 FTDs.

Appendix B to Part 60 and subsequent Attachments contain a considerable amount of work already performed by the NSPM to help define the technical as well as data requirements for Level 2 and 3 FTDs. The possibility of continuing to work in the same area of Part 60 and in the same direction would be a logical place to begin discussion on the matter.

Thank you for your consideration. Please do not hesitate to contact me if you have any comments or questions.

Sincerely,

Al Gleske

Elmer G. Gleske