

BOMBARDIER
AEROSPACE



DFW Customer Training Center
2929 W. Airfield Drive
DFW Airport, TX 75261

November 24, 2003

Mr. Nicholas A. Sabatini
Associate Administrator for Regulation and Certification
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

Re: FAA National Simulator Program/Industry ARC Part 60 Efforts

Dear Mr. Sabatini:

Although Bombardier Business Aircraft has participated on the subject ARC, our inputs have not been provided in full real time to the benefit of the committee. Nevertheless, we have been honored with the opportunity to take part in this effort. However, recent discussions regarding of the Level 1, 2, and 3 Flight Training Devices (FTD) are of particular interest to us.

As you know, the content of the existing advisory circulars... both for full flight simulators (FFS) as well as FTDs have evolved over many years since the 1970s. And there has been careful consideration by both industry and FAA to the changes. While it is apparent the ACs cannot be used for regulatory governance of our industry, the content of these documents and the fact that they are maintained under a single National Simulator Program Manager are both of critical importance.

Consequently, Bombardier Business Aircraft respectfully requests that support for the migration of Level 1, 2, and 3 training devices to authorities outside of the FAA National Simulator Program be withheld. This is based on two primary concerns:

- 1) The support for devices used in an overall training program, which have two regulatory standards, is inherently ineffective and troublesome. Maintaining one device to AFS 800 standards while another is maintained to NSP standards is certainly a step back in the positive evolution we have achieved in the past twenty plus years.
- 2) Also, since AFS 800 standards are established on a regional basis, and since Bombardier operates in more than one region, it is likely that we would have to maintain different standards for the same device in different locations. We feel this would also create another gap between us and the desire to achieve harmony with other international standards.

Additionally, Bombardier Business Aircraft feel it is important to resolve these issues under the current FAA Part 60 ARC authorization rather than wait for another FAA/Industry effort. Even if the Level 1, 2, and 3 devices are maintained under the NSP, this final unresolved item should be completed. The overall Part 60 effort was aimed at the correction of the Advisory Circular application, and to maintain a portion of training devices within the AC system is not consistent with the charter of the ARC and the overall Part 60 effort.

Thank you for your consideration of this request. And do not hesitate to contact me if I can be of assistance.

Regards,

Carl Lapiska
Manager, Bombardier Business Aircraft
Engineering and Program Development
Montreal and DFW Customer Training Centers