FSTD Guidance Bulletin 07-01

NSP Discrepancy Closure & Request for Due Date Extension

Purpose:

The information contained herein provides sponsor guidance in managing FSTD evaluation discrepancies originated by the FAA National Simulator Program (NSP) or Training Program Approval authority (TPAA). For self-disclosed Missing, Malfunctioning, or Inoperative (MMI) Component reporting see NSP Guidance Bulletin 08-01.

Scope:

This Guidance Bulletin provides an acceptable means, but not the only means of compliance with Title 14 Code of Federal Regulations (CFR) Part 60 pertaining to the Evaluation and Qualification of Flight Simulation Training Devices (FSTD) for use in FAA Approved Flight Training Programs. If an applicant chooses to utilize the approach described within this Guidance Bulletin, that applicant must adhere to all methods, procedures, and standards herein. Should an applicant desire to use another means, a proposal must be submitted to the National Simulator Program Manager (NSPM) for review and approval prior to implementation. This Guidance Bulletin does not change regulatory requirements or create additional ones, and does not authorize changes in, or deviations from, regulatory requirements.

Approval: Harlan G. Sparrow III
National Simulator Program Manager
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<td>Update to new format and align procedures with current NSP policies and Form T002 instructions. Replace NSP references with FAA. Address discrepancies that do not require NSP notification and sponsors operating under a DPS.</td>
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1. Background

1.1. In the course of FSTD evaluations conducted by the NSP or TPAA, FSTD discrepancies and other findings are summarized on the NSP T002 Evaluation Report. Certain categories of NSP discovered discrepancies require the sponsor to report corrective actions within a specified period while others do not. The following guidance serves to assist FSTD sponsors in the discrepancy management process.

2. Discrepancy Correction Requiring NSP Notification

2.1. NSP notification of correction is required when a correction period is included in the “Action Required” block of the T002 Evaluation Report. The time period granted for correction of a discrepancy found during an evaluation may not be exceeded without the approval of the NSP.

2.1.1. Discrepancy Closure: Timely closure of NSP discrepancies should be processed by completing the appropriate fields of the completed NSP electronic evaluation report (received at the completion of the evaluation) and forwarding to the NSP Duty Officer. Do not alter the format of the electronic document. PDF files cannot be accepted. This correspondence should arrive no later than the expiration date for the discrepancy and should include the sponsor discrepancy number, corrective action taken and date closed in BOLD RED FONT. Any previous submittal entries should be changed to black font. Multiple closures (or extension requests) may be entered on one report.

2.1.2. Extensions: The initial time period allotted for correction of a discrepancy discovered during an NSP-conducted FSTD evaluation is at the discretion of the NSP evaluator. However, we recognize the potential for some discrepancies to require longer time periods to effect an appropriate correction (i.e. parts acquisition etc.). The decision to grant an extension including the length of the extension
will be determined by the NSP on a case by case basis and may be coordinated with the Evaluating Inspector (EI), NSP supervisor or TPAA/POI/TCPM. For consideration, the request must include an explanation of the action that has been accomplished to date, proposed further action, and an estimate of the additional time required. Decision criteria may include:

- The actions that have been taken up to the time of the request,
- How significantly the FSTD operation is affected by the discrepancy in question,
- Restrictions (if any) to FSTD training, checking, or testing tasks, and
- Any previous extension granted.

Sponsors are urged to submit the request at least two days prior to the discrepancy due date. If the discrepancy due date is on a Saturday, Sunday, or a holiday, the FAA will extend the deadline until the next business day. The NSP should respond to the sponsor’s request for extension within five business days. During this time, the sponsor retains implied authorization from the NSP to continue operating the FSTD. To request an extension for discrepancy correction, complete the appropriate fields on the NSP T002 evaluation report received at the conclusion of the evaluation. Include corrective action taken to date, proposed further action, and the additional time requested in **BOLD RED FONT**. Any previous submittal entries should be changed to black font. Do not alter the format of the electronic document. PDF files cannot be accepted. Submit via email to the NSP Duty Officer. Multiple closures (or extension requests) may be entered on one report.

### 3. Discrepancy Correction not Requiring NSP Notification

3.1. The NSP does not require notification of a discrepancy correction if the “Action Required” block on the T002 Evaluation Report states “Close
per Sponsor’s SQMS with no closure period indicated. In these cases, it is expected that the sponsor will document the discrepancy in the sponsor’s discrepancy log, prioritize, and take corrective actions in accordance with their Simulator Quality Management System (SQMS).

3.1.1. Although notification of correction is not required, the sponsor's discrepancy number should be indicated in the appropriate column on the NSP T002 Evaluation report and submitted as soon as practical. The NSP may periodically conduct inspections or inquiries to review the status of these discrepancies at any time.

4. Discrepancy Prioritization System

4.1. Sponsors operating under an NSPM-Authorized/Accepted Discrepancy Prioritization System (DPS) may self-authorize a one-time 30-day extension for an NSP discovered discrepancy. DPS sponsors must make notification to the NSP on the T002 Evaluation Report when exercising this option. DPS requirements are found at: http://www.faa.gov/about/initiatives/nsp/sqms/sqms_more/

5. Reporting, Appealing & Further Information

5.1.1. Reporting: All closure/extension actions should be forwarded to the NSP Duty Officer email in-box at 9-aso-avr-sim-team@faa.gov by placing the FAA FSTD ID# in the subject line. In the event of a TPAA conducted evaluation, sponsors should also forward copy the TPAA. Updated reports should be submitted when any of the following conditions exist:

- All discrepancies with required closure period in the action required column have been corrected.
- A discrepancy with a “Non-qualified Task” is corrected.
• It is determined that a discrepancy with a required closure period will not be corrected in the prescribed time and an extension is being requested.

• **DPS Sponsors Only**: If a self-authorized extension is being exercised.

5.2. **Appeal Process**: A discrepancy or denial of extension may be contested by contacting the NSPM. To do so, a formal letter or email requesting reconsideration should be written to the National Simulator Program Manager as far in advance of the due date as possible. The NSPM will review the matter and inform the applicant of the outcome. Additionally, The NSP Duty Officer can be reached in the Atlanta office Monday through Friday at 404.832.4700.

5.3. **Additional Information**: More specific information on completing the T002 Evaluation Report may be found in that form's instruction section. For MMI reporting see NSP Guidance Bulletin 08-01.

**Feedback**: Sponsors are always encouraged to leave feedback for the NSPM concerning FSTD evaluations or other matters. Feedback may be anonymous. Select the Feedback link on the T002 Evaluation Report or on the NSP home webpage at: http://www.faa.gov/about/initiatives/nsp/
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Verify correct revision at: [http://www.faa.gov/about/initiatives/nsp/flight_training/bulletins/](http://www.faa.gov/about/initiatives/nsp/flight_training/bulletins/)
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**Attachments:**

None