

Part 142 Training Center Questions and Answers

Question: No standards are set as to the number of Training Center Evaluators (TCEs) that may act as contract check pilots for an operator. Some Principle Operations Inspectors have set a low number that limits the ability to schedule training.

Response: There are two separate issues raised by this question. The first concerns standards for the number of contract check pilots that POIs will or may authorize for their particular operator and the second concerns scheduling of center personnel.

First Issue—The number of contract check pilots authorized. The policy divisions within the FAA do not believe it is in the public interest to provide formulas that determine or set arbitrary figures on the number of check pilots the operator's POI may authorize. Current regulations require air operators to "...have sufficient qualified management and technical personnel to ensure the highest degree of safety in its operations." In this context, guidance does not limit the number of contract check pilots that an operator may qualify and train in support of their operations. FAA Order 8900.1 outlines in detail the training required, and training that may be credited, toward meeting the requirements of certain operating rules.

From a policy perspective, we are not inclined to establish, or artificially limit, the POI's ability to manage a particular certificate holder's capability to comply with current regulations including the training, qualification, and continued surveillance of their authorized contract check pilots. We are, however, providing guidelines concerning the variable elements that should be considered when evaluating an operator's request for contract check pilots. For example:

- The kind of operation, and the number and type of airplanes used;
- The area of operation, and the crewing ratios and geographical distribution;
- Number and type of evaluations expected;
- How does the operator structure its evaluations;
- Crew turnover ratios, and the projected initial, upgrade, and recurrent workload;
- Accessibility of appropriate training facilities;
- Calendar timing of evaluations; and
- Any other factors the POI and operator deem appropriate.

The overriding issue remains the quality and currency of the operator's contract check pilots. In their capacity as evaluators, check pilots are representatives of the Administrator and are an operator's first line of quality control. To arbitrarily establish a formula, in the name of standardization, that determines the quantity of check pilots without consideration of their primary function would not enhance the overall quality of training or flight safety.

Second Issue—Scheduling contract check pilots. Although the scheduling of training seems to be an instructor rather than a contract check pilot issue, it is assumed that the reference to training includes evaluation modules. The issue of how a center manages its employees is not an appropriate issue for the FAA to comment upon.

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Question: Are standards set as to TCE training records that must be made available to operators?

Response: The following response assumes your question is referring to an operator who wishes to use the services of a center TCE as a contract check pilot. FAA Order 8900.1 is very clear concerning the procedures to be followed for the appointment of check pilots. If a Training Center does not wish to have their TCEs act for or on behalf of an operator as a contract check pilot, then no record requirements exist for this purpose. If a training center chooses to permit its TCEs to act contract check pilots for an operator and to also take credit for a portion of their TCE training to meet the contract check pilot training requirements of the operator, then the center is obliged to provide whatever documentation the operator requires to justify crediting the TCE's part 142 training and qualification to be a contract check pilot. Operators are required to provide their POIs with sufficient documentation to enable the POI to review the nominee's background, qualifications, and training in order to consider the individual as a contract check pilot. If no credit is being requested for the training that the TCE received from the center as part of the individual's appointment as a TCE, then no training records would be required by the operator (since the operator would be completing all of the required training).

Question: Regarding multiple centers for the same aircraft type, some Principal Operations Inspectors believe that current guidance requires an operator to designate only one contract training provider in Training Specification A031.

Response: FAA Order 8900.1 cautions POIs about the inherent difficulties and additional surveillance required when an operator requests to have their training curriculum conducted by two different providers. If the POI has reason to believe that multiple centers can provide the quality training required by the operator's approved curriculum, they may authorize two or more facilities to conduct the subject training. However, if a POI believes that an operator's approved training program cannot be adequately presented at multiple centers due to differing courseware, FTDs, simulators, etc., and/or the operator may not have the ability to adequately monitor their training, the POI has the **responsibility** to limit such training. Operator and/or FAA surveillance workload may also play a role in the decision concerning multiple training locations.

Question: Two (2) aircraft type limit for TCEs—Under what circumstances could a TCE be authorized to evaluate in a third aircraft type?

Response: This issue has been reviewed and current guidance (FAA Order 8900.1, Vol. 3, Chap. 54, Sec. 2, para. 3-4355 C. 4) b), dated 8/4/14) does not allow TCEs to have more than two (2) aircraft type authorizations.

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Question: Visa requirements for foreign part 142 training center students. What is the role of the FAA with respect to the immigration status of foreign pilots enrolled in part 142 training centers?

Response: The FAA does not set or regulate the government's policies or procedures relating to visa requirements. Our obligation extends only to verifying an individual's identity and the reporting of suspicious situations to local authorities. It is the training center's responsibility to comply with applicable immigration and TSA requirements. TSA requirements may be found in 49 CFR part 1552—Flight schools.

Question: Is there an FAA initiative to create a simulator PTS for ATP and type ratings?

Response: This issue has been a point of discussion and some manufacturers are currently holding discussions on this subject. We are also considering amending the PTS to provide for simulator-specific standards. We anticipate those standards to be associated with qualification modules within approved programs. Tasks which might be allowed to defer to an approved qualification module are:

1. Stalls: Type-specific stall scenarios, in operational conditions (e.g., high altitude cruise with autothrottle rollback, low speed maneuvering in a traffic pattern);
2. Approaches: FMS LNAV/VNAV approach operations in lieu of VOR, NDB, LOC, LOC B/C, etc., with one conventional nonprecision approaches using raw data as an "abnormal."

Any comments you may wish to offer would be welcomed.

Question: Certain modifications and improvements are required to make IACRA more user friendly for part 142 training centers use (flight time record for an additional aircraft type).

Response: Changes have been made to the IACRA system which will enable training centers to more fully use it to issue certificates. Please reference the FAA's IACRA web site (<http://acra.faa.gov/iacra/>) and forward your suggestion(s). You may also call 866-285-4942 and provide comments.

Question: Steep Turns and Stalls and the CRM Issue—Not all Training Centers, TCPMs, and Principal Operations Inspectors agree with the part 142 guidance for these tasks. We need to revisit this issue.

Response: The current policy concerning steep-turns and stalls and the participation of the PNF has been revisited on numerous occasions. The guidance posted on FAA's Air Transportation Division—Air Carrier Training and 142 Training Center Branch web site is current and accurately reflects the FAA's policy on this issue.

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Question: Circling Approach Restrictions and the 90-degree Rule—Currently all simulator circling approach tasks must be performed using a visual model that will permit compliance with the 90 degree rule. This policy restricts the airports used for practical tests and proficiency checks to a limited number due to the visual capabilities of the models used. If all checks are conducted at the same set of airports, training, testing and checking become too predictable, and the full training value of a simulator may be lost. What alternative could be proposed?

Response: We do not view this issue as restrictive. There are numerous possibilities for the entry into the circling maneuver. Additionally there are no restrictions on the number of visual models that can be approved for a particular centers use.

Question: 14 CFR part 142 §142.65, Use of Takeoff Reset—We need to discuss the restriction of the use of takeoff reset during testing and checking.

Response: Takeoff reset may be used anytime the simulator is on the ground and the instructor or evaluator wishes to position the simulator for the next departure provided the evaluator clearly advises the students that the evaluation is being suspended during the reset. Concurrently, the prohibition on using the simulators slew or repositioning modes does not apply to setting the simulator up for second and subsequent departures during training or checking events. (See the FAA's Air Transportation Division—Air Carrier Training and 142 Training Center Branch web site.)

Question: Is Land and Hold Short (LAHSO) Training required for ATP or type rating by FSGA-99-02A?

Response: The document referred to is obsolete. However, see the Airline Transport Pilot and Aircraft Type Rating Practical Test Standards for Airplane, FAA-S-8081-5F (Change 7), for LAHSO testing requirements.

Question: The standards for Instructor Standardization Training for part 121 carriers should not exceed the 16-hour base. (Basic Indoc?)

Response: Hourly limits or mandatory hours for such training miss the objective. FAA Order 8900.1 requires training to qualify a center's flight instructors to train an air carrier's curriculum. AFS-280 has developed a job aid for operators and POIs to use when evaluating the amount of training a centers instructor must complete to meet the minimum requirements of the appropriate operating rule.

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Question: Crew/individual oral exams—Some training centers have received TCPM guidance that requires that separate oral exams be conducted even though two applicants have trained together as a crew, and are being tested as a crew for the type rating. FAA Order 8900.1 guidance does permit this.

Response: The objective of an oral evaluation is to determine an individual's knowledge, not the knowledge of the crew. The fact that individuals are being trained and flight- tested as a crew is really not pertinent to the issue. The demonstration of knowledge pertaining to the certificate being sought is not a crew event. Additionally, it is the responsibility of the evaluator to determine that the "individual" has the knowledge required to support the skills necessary to satisfactorily complete the flight portion of the subject evaluation.