

Federal Aviation Administration
Flight Standards Service
Air Carrier Training Aviation Rulemaking Committee (ACT ARC)

**ACT ARC Recommendation 20-8
Pilot Qualifications for Flight Standardization Board Training Evaluations**

I. Submission

The recommendations below were submitted by the Flight Standardization Board Workgroup (FSB WG) for consideration by the Air Carrier Training Aviation Rulemaking Committee (ACT ARC) Steering Committee at F2F-22, March 4-5, 2020. The ACT ARC Steering Committee adopted the recommendations, and they are submitted to the Federal Aviation Administration (FAA) as ACT ARC Recommendation 20-8.

II. Statement of the Issue

The FAA asked the ACT ARC to examine whether the FAA should reconsider its Flight Standardization Board (FSB) Operational Evaluation (OE) process and, if so, to recommend what elements should be included and what standards should be used to ensure consistent conduct of OEs. The ACT ARC established the FSB WG to complete this FAA-initiated tasking. The current FSB process for conducting evaluations for the purposes of determining type rating, training, checking, and currency requirements on new or derivative aircraft (T tests) generally uses Federal Aviation Administration (FAA) Aviation Safety Inspectors (ASI). This policy is stated in FAA Advisory Circular (AC) 120-53B, Change 1, Guidance for Conducting and Use of Flight Standardization Board Evaluations, and FAA Order 8900.1. Aside from stating which FAA Flight Standards Service offices could possibly provide ASIs to be test subjects, the current policy does not specify any other guidelines for determining pilot test subjects.

III. Proposed Recommendations

The ACT ARC recommends the FAA consider reviewing and updating the process of determining pilot participation in FSB evaluations for the purposes of determining pilot type rating, training, checking, and currency requirements, also called T tests. The ACT ARC further recommends the FAA consider the following recommended provisions:

- a) The original equipment manufacturer (OEM) would propose in its evaluation plan the expected pilot profiles and prerequisites, and the FAA, in consultation with the OEM and any regulatory agency participating in a joint evaluation, would determine the number of test subjects and validate their applicable qualification prerequisites for each FSB evaluation.
- b) FSB members and all pilot evaluators used as test subjects should have the minimum profile and prerequisites necessary to begin the evaluations.
- c) The FAA would identify and submit any refresher training for the test subjects to the OEM for resolution.
- d) The FAA should include a sufficient number of Certificate Management Office (CMO)/Flight Standards District Office (FSDO) pilots from customer FAA offices to support follow-on FAA Flight Standards Inspector Resource Program (FSIRP) check rides.
- e) In addition to FAA pilots, the FAA should use line pilots from customer air carriers and business jet operators as test subjects to support the pilot profiles and prerequisites agreed upon between the FAA and OEM, and to ensure evaluation results are as

- realistic and practical as possible.
- f) The FAA should revise the language in AC 120–53B Change 1, Appendix 3, 1. (h) to provide for use of such non-FAA pilots.

IV. Rationale and Discussion

The ACT ARC believes it is imperative to ensure that the FAA, with the support of industry, has the best team in place during the FSB evaluation (T test) process to ensure the most realistic and practical results for the Flight Standardization Board Report (FSBR). T test evaluation subjects should vary in skill, experience, and ability, based on the target group that is expected to fly the specific aircraft and, as such, a cross section of those pilots should be utilized during the full FSB process. In some cases, the FAA may not have any aviation safety inspectors who are qualified and current on a base aircraft proposed for an evaluation.

The ACT ARC recommends the OEM propose to the FAA the expected pilot profiles and prerequisites for all required T tests. The experience level and minimum requirements of the team members should be based on agreement reached between the AEG and OEM. Each team member must fully understand their role and obligations, and how those contribute to the overall outcome of the evaluation. A standard resume template that includes all relevant and pertinent information for evaluation FSB teams would help to standardize team member selection. There should be full clarity and transparency in the makeup of the Operational Evaluation (OE) team, and this thought process should become part of the FSBR. The ACT ARC envisions the FAA, in consultation with the OEM and any regulatory agency participating in a joint evaluation, would determine the number of test subjects and validate their applicable qualification prerequisites for FSB evaluation.

The inclusion of a group of current line pilots from customer air carrier or business jet operators would represent the pilots who will actually fly the candidate aircraft. Industry pilots offer a more current and holistic perspective on operating in the actual environment in which these aircraft will fly due to their more recent experience in normal operations. The FAA could use some of these pilots to help relieve FAA testing requirements during initial cadre training and testing.

The AEG will need to consider many factors when determining the qualifications and background of test subject pilots. The primary focus should be on having a realistic validation, with pilots representing a cross-section of pilots who will actually fly on the candidate aircraft.

The recommendations provided in this document about integrated AEG/FSB activities are complementary to input from the Department of Transportation Special Committee, Joint Authorities Technical Review (JATR), and Safety Oversight and Certification Aviation Rulemaking Committee (SOC ARC).

V. Background Information

ACT ARC Recommendation 20-8 addresses Items 1 and 3.a-c in the FSB WG Scope of Work and ACT ARC Initiative #43 (see below):

FSB WG Scope of Work:

1. Examine whether the FAA should reconsider its current process of an FAA operational evaluation.

- a. If the WG decides that the FAA should reconsider, the WG should examine the possible alternatives to the current process.

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3. In developing proposed recommendations responsive to (1) . . . , consider, at minimum, the following:

- a. Would the new or improved operational evaluation include some or all of the elements that are currently included in an FAA operational evaluation?
- b. Would the new or improved operational evaluation include elements that are not included in a current FAA operational evaluation?
- c. What standards should be used to ensure the consistent conduct of operational evaluations?

ACT ARC Initiatives:

- Initiative #43: Examine how the FAA could improve its current Flight Standardization Board (FSB) Process and product (FSB Report) to meet the interests of all stakeholders.

References

- FAA AC 120-53B, Change 1, October 24, 2016.
- FAA Order 8900.1.