

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

ACT ARC Recommendation 20-9

Timely Publication & Application of Flight Standardization Board Evaluation Results

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 20-9.

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 publication and application of FSB reports (FSBR) is not timely enough to support industry needs. Some reports have taken as long as eight months to complete, significantly slowing the time for entry into service of new or modified aircraft. Further, the inclusion of more detailed available data in the FSBR could aid operators in the development of training programs.

Likewise, the time required to publish and issue type ratings to pilots can be unnecessarily long. At the completion of an AEG evaluation, the subsequent type rating determination must be reviewed by both the FAA Air Transportation Division–Air Carrier Operations Branch (AFS-200) and the General Aviation and Commercial Division (AFS-800) and can take several months to complete. This information is then sent to the Airmen Certification Branch (AFS-760) for publication. A streamlining of this process, as well as a policy permitting issuance of temporary Letters of Authorization (LOA) to pilots undergoing training in conjunction with participation in FSB evaluations, would shorten the time needed to issue type ratings to pilots for new or modified aircraft.

The time required to qualify Flight Simulation Training Devices (FSTD) also slows entry into service. Interim approvals of such devices used during the FSB evaluations should be accomplished such that certification of FSB evaluation participants is timely and final approvals should be prioritized to support timely entry into service. Additionally, the ACT ARC also believes it may be beneficial for the FAA to establish policy for the occasional cases where a sponsor for Flight Simulation Training Device (FSTD) qualification is not available at the time of the FSB evaluation. While most original equipment manufacturers (OEM) either have their own Title 14 Code of Federal Regulations (14 CFR) part 142 training center or have a relationship with a part 142 training center they use for the conduct of the FSB evaluation, occasionally, FSBs conduct evaluations of aircraft for which the OEMs do not have such relationships. These OEMs may not be able to qualify as sponsors of FSTDs in accordance with 14 CFR part 60; consequently, these OEMs cannot have FSTDs qualified by the National Simulator Program (NSP) for the purposes of an FSB. This may force these OEMs to conduct FSB training and checking in the aircraft. Training in an aircraft is not desirable because it exposes the pilots to unnecessary risk, is not representative of most air carrier and training center training programs,

and it is not possible to meet all of the requirements of 14 CFR part 121 (e.g., extended envelope training), nor is it as realistic or possible for certain items (e.g., V₁ cut, windshear).

III. Proposed Recommendations

The ACT ARC recommends that the FAA consider a review of current FSB procedures and the documentation, communication, dissemination, and application of evaluation results. The review should focus on an efficient, FAA Flight Standards Service (AFX)/Aircraft Evaluation Group (AEG) review, coordination, and approval of the FSB results so that timely application of such approvals can be operationally available to the industry. The following issues should be considered:

1) Reducing the time it takes to publicly disseminate pilot type rating determinations.

Centralization and streamlining of the process for acceptance, recording, and publication of pilot type ratings could reduce the time necessary for public dissemination.

2) FSB evaluated training course acceptance. Development of a process and a formal policy for timely acceptance of the minimum type rating training and difference training/checking found acceptable by the FSB evaluation would also shorten the timeframe for publication.

3) All necessary Flight Training Device (FTD) and Full Flight Simulator (FFS) approvals. The ACT ARC recommends the formalization of the current policy of giving interim approval of FTD and FFS used in successful FSB evaluations. Interim approval should be timely enough such that certification of personnel in recommendation #5, below, can be accomplished. Final evaluation and review of such devices should also be prioritized to support timely entry into service of new and derivative aircraft.

4) FSTD Qualification for conduct of an FSB when there is not a sponsor. The ACT ARC recommends the FAA consider establishing a way for OEMs to have FSTDs sponsored and qualified by the NSP in the absence of a part 142 training center or other appropriate sponsor, so training can be conducted in an FSTD.

5) Letter of Authorization (LOA) check rides for the following:

- a. FSB members participating in course evaluations,**
- b. Necessary original equipment manufacturer (OEM) and partnering training provider pilots, instructors, and training center evaluators (TCE) who have participated in the FSB.**

The ACT ARC recommends the FAA consider a policy that allows, on a temporary basis, subsequent use of minimum type rating training and difference training/checking courses found acceptable by the FSB evaluation. Such courses are needed at the outset of new ratings and courseware in order to efficiently propagate the necessary qualification for timely entry into service of new and derivative aircraft.

6) Internal development of FAA approved pilot training courses for type ratings. The ACT ARC recommends the FAA consider prioritizing the internal development of new pilot training courses by the Flight Standards Training Division (AFS-500) in order to qualify FAA pilots in new type ratings in an expeditious manner. Such a process would limit the necessary reliance on and cost of industry training providers and allow for better management of internal FAA programs.

7) Acceptance of OEM managed data (e.g., Operator Difference Requirements (ODR) tables). The ACT ARC recommends the FAA consider the acceptance and dissemination of OEM managed data such as ODRs. OEM ODRs are the building blocks of successful pilot training elements and as such are a significant set of guidance for all aircraft operators, including US operators. OEM ODRs contain significantly more data than the FAA Difference Tables and, in the case of authorities partnering in joint FSB evaluations, are fully applicable to US operators.

IV. Rationale and Discussion

These recommendations can be categorized into two primary areas:

- 1) Reducing the Industry barriers for entry into service of new aircraft while awaiting Formal FAA approval of the Pilot Type Rating following the FSB.

Qualifying the OEM, training provider, and air carrier initial cadre pilots to support aircraft deliveries and training programs has been problematic. Historically, the number of pilot certifications performed by the AEG have been insufficient to support the needs of both the OEM and training providers in supporting entry into service of the new airplane and to develop and approve the pilot training programs. The ACT ARC recommends that, immediately upon successful conclusion of the FSB evaluation, FAA Inspectors, FSB training course instructors (OEM or Flight Training Provider), and part 142 Training Center Program Managers (TCPM)/Fleet Training Program Managers (FTPM) who have participated in the FSB course evaluations be allowed to “accept” and use the Draft FSB results for the purpose of issuing Letters of Authorization (LOA) to the initial cadre of OEM, air carrier, and/or operator pilots, training provider instructors and Training Center Evaluators (TCE), and also for beginning formal training course approvals. This would better support industry’s ability to achieve timely entry into service. The ACT ARC also recommends the FAA consider the merit of qualifying a certain number of TCEs based on the accepted, interim training program, to alleviate possible strain on FAA employees. These decisions should be documented in guidance materials for visibility within the FAA and for industry.

- 2) Reducing the FAA internal coordination time and inefficiencies in Pilot Type Rating approval and publication.

- Currently the draft FSB approval process consists of multiple, linear steps involving multiple offices and Divisions internal to the FAA. The ACT ARC recommends the FAA review its internal processes for the purpose of making more efficient, timely decisions that support the entry in service of aircraft and aircraft systems. As understood by industry, some, but not all, of these steps are listed below;
 - Review and approval of draft FSB by the FSB Chairman's AEG field office manager;
 - Review by the Air Carrier Training and Systems and Voluntary Safety Programs Branch (AFS-280);
 - Review by AFS-800;
 - Publication in the Federal Register for public comments for 30 days;
 - Consolidation and disposition of public comments;
 - Resubmission to other FAA offices for final approval;
 - Publication on FAA Type Rating Table by AFS-800; and
 - Submission of type rating determination to AFS-760 for publication.

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 20-9 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.