Cmt#	Segment description	Page	Comment	Attachments
79	CS FCD.105 Definitions	11 - 12	**Paragraph No:** CS FCD.105 Definitions (d) **Comment:** Very similar handling and flying characteristics could mean subtle, but important, differences in technique or procedure. **Justification:** There have been accidents in which similar technique or procedure principles were cited as not appropriate. **Proposed Text:** Amend to read: *Common Take-off and Landing Credit (CTLC)* means a programme or process that allows credit for recent experience between aircraft types that can be demonstrated to have very similar handling, **flying characteristics and operating technique/procedures** during take-off and initial climb, approach and landing, including the establishment of the final landing configuration	
80	CS FCD.415 Difference levels — Training, checking and curren	20 - 24	**Paragraph No**: CS FCD.415 Difference levels — Training, checking and currency Footnote (3), sub para (2)(b)(4) Level D Training **Comment:** The word device appears to have been deleted incorrectly **Proposed Text:** Amend to read: Training for level D differences requires **a device** that has accurate, ….	

Cmt#	Segment description	Page	Comment	Attachments
81	GM1 FCD.415 Difference levels — Training, checking and curren	24 - 27	**Paragraph No:** GM1 FCD.415 Difference levels — Training, checking and currency, sub para (b) (5) **Comment:** The UK CAA believes Safe OEI training/checking principles must be addressed **Justification:** There have been accidents in which the 'good' engine has failed with the simulated failed engine at idle. **Proposed Text: Amend to read:** (5) Level E training For safety reasons, if the training is performed in an aircraft, **consideration must be given** to high-risk situations like engine loss, by not shutting down the engine but rather simulating the engine failure **by using safe OEM recommended methods such as Train Mode** or by setting the affected engine at idle or zero thrust..	