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<b>Title</b>	Update of the flight simulation training device requirements
<b>NPA Number</b>	NPA 2020-15

**UK CAA** (European.Affairs@caa.co.uk) has placed **42** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments														
1213	AMC3 to Appendix 9 Training, skill test and proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs	11 - 18	<p><b>Page No:</b> 12</p> <p><b>Paragraph No:</b> Training Matrix Table, Section 2.1</p> <p><b>Comment:</b> While it is noted that the table is essentially generated from the requirements of MULTI-PILOT AEROPLANES AND SINGLE-PILOT HIGHPERFORMANCE COMPLEX AEROPLANES from Part-FCL, maybe clarifying the format would be helpful. It would be clearer if the individual section titles were with the section number, currently –</p> <table border="1"> <tr> <td colspan="2">Section2</td> </tr> <tr> <td>2</td> <td>Take-offs</td> </tr> <tr> <td>2.1</td> <td>Normal take-offs with different flap settings, including expedited take-off</td> </tr> <tr> <td>2.2</td> <td>Instrument take-off; transition to instrument flight is required during rotation or immediately after becoming airborne</td> </tr> </table> <p><b>Justification:</b> To improve clarity</p> <p><b>Proposed Text:</b></p> <table border="1"> <tr> <td colspan="2">Section 2 <b>Take-offs</b></td> </tr> <tr> <td>2.1</td> <td>Normal take-offs with different flap settings, including expedited take-off</td> </tr> <tr> <td>2.2</td> <td>Instrument take-off; transition to instrument flight is required during rotation or immediately after becoming airborne</td> </tr> </table>	Section2		2	Take-offs	2.1	Normal take-offs with different flap settings, including expedited take-off	2.2	Instrument take-off; transition to instrument flight is required during rotation or immediately after becoming airborne	Section 2 <b>Take-offs</b>		2.1	Normal take-offs with different flap settings, including expedited take-off	2.2	Instrument take-off; transition to instrument flight is required during rotation or immediately after becoming airborne	
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1214	AMC3 to Appendix 9 Training, skill test and proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs	11 - 18	<p><b>Page No:</b> 13</p> <p><b>Paragraph No:</b> Training Matrix Table, Section 3.1.4</p> <p><b>Comment:</b> This section mentions “visual approaches” but the fidelity level for Visual Display Cue is “N” for both testing and checking (T&amp;C) and training (T) tasks.</p> <p><b>Justification:</b> Clarity required.</p>															
1215	AMC3 to Appendix 9 Training, skill test and	11 - 18	<p><b>Page No:</b> 13</p> <p><b>Paragraph No:</b> Training Matrix Table, Sections 3.4.0, 3.4.1, 3.4.5</p>															

	proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs		<p><b>Comment:</b> The fidelity level for testing and checking (T&amp;C) tasks is shown as “R” for Visual Display Cue when it is specified as “S” for all other systems listed in section 3.4</p> <p><b>Justification:</b> Clarity required.</p>	
1217	AMC3 to Appendix 9 Training, skill test and proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs	11 - 18	<p><b>Page No:</b> 13</p> <p><b>Paragraph No:</b> Training Matrix Table, Section 3.4.5</p> <p><b>Comment:</b> The fidelity level for training (T) task A is shown as “N” for Flight Controls and Forces. Hydraulics typically provide flight controls actuation which is checked as part of systems operation.</p> <p><b>Justification:</b> Clarity required.</p>	
1220	AMC3 to Appendix 9 Training, skill test and proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs	11 - 18	<p><b>Page No:</b> 14</p> <p><b>Paragraph No:</b> Training Matrix Table, Section 3.4.9</p> <p><b>Comment:</b> The fidelity level for all training (T) tasks is shown as “N” for Sound Cue. It is not understood why aural stall warnings are not included</p> <p><b>Justification:</b> Clarity required.</p>	
1221	AMC3 to Appendix 9 Training, skill test and proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs	11 - 18	<p><b>Page No:</b> 14-15</p> <p><b>Paragraph No:</b> Training Matrix Table, Section 3.7.1 3.7.2</p> <p><b>Comment:</b> The fidelity level for all training (T) tasks is shown as “N” for both Environment–Navigation and Environment-Atmosphere &amp; Weather. This is not understood.</p> <p><b>Justification:</b> Clarity required.</p>	
1223	AMC3 to Appendix 9 Training, skill test and proficiency check for AMC3 to Appendix 9 Training, skill test and proficiency check for IRs	11 - 18	<p><b>Page No:</b> 15 &amp; 16</p> <p><b>Paragraph No:</b> Training Matrix Table, Sections 3.8.3.4, 4.5</p> <p><b>Comment:</b> These tasks are applicable “until touchdown (3.8.3.4) and “after touchdown” (4.5) but the fidelity level for both testing and checking (T&amp;C) and training (T) tasks is shown as “N” for Ground Reaction and Handling Characteristics</p> <p><b>Justification:</b> Clarity required.</p>	
1225	ARA.FSTD.120 Continuation of an FSTD qualification	23 - 24	<p><b>Page No:</b> 23</p> <p><b>Paragraph No:</b> ARA.FSTD.120 (a)(1)</p> <p><b>Comment:</b> By adding the word ‘<i>Validation</i>’ this might inadvertently make readers believe that only the Objective tests require running progressively over a 12-month period, and omit to check that the Functions &amp; Subjective tests have been run in a similar manner.</p> <p><b>Justification:</b> Clarity required.</p>	

1226	ARA.FSTD.125 Declaration of the equipment and specifications list (ESL) to the competent authority	24	<p><b>Page No:</b> 24</p> <p><b>Paragraph No:</b> ARA.FSTD.125 (a) &amp; (b)</p> <p><b>Comment:</b> It is recommended that the order of (a) &amp; (b) is reversed to better reflect the evolution of the ESL.</p> <p><b>Justification:</b> Reads better.</p>
1229	ARA.FSTD.125 Declaration of the equipment and specifications list (ESL) to the competent authority	24	<p><b>Page No:</b> 24</p> <p><b>Paragraph No:</b> ARA.FSTD.125, Rationale</p> <p><b>Comment:</b> The rational states –</p> <p>“This new IR formally establishes the requirement for CAs to deal with the organisations that operate FSTDs with declared ESLs. <u>There is no need for further action from the CA once the acknowledgement of declaration is received.</u> It becomes part of continued oversight and the certificate is not to be changed.”</p> <p>This appears to conflict with ARA.FSTD.130 (c) which states –</p> <p>“The competent authority may decide to complete a special evaluation following after any of the following events:</p> <p>(3) changes to an ESL declaration for an FSTD.”</p> <p><b>Justification:</b> Clarity required, proposed alternative text offered below</p> <p><b>Proposed Text:</b></p> <p>“Upon receiving a declaration, or notification of a change to a declaration, from an organisation operating FSTDs regarding the equipment and specifications list (ESL) for an FSTD, the competent authority shall acknowledge receipt of the declaration and comply with the applicable elements of ARA.FSTD.130.”</p>
1231	ARA.FSTD.135 FSTD qualification certificate – Limitation, suspension and revocati	25	<p><b>Page No:</b> 25</p> <p><b>Paragraph No:</b> ARA.FSTD.135 (d)</p> <p><b>Comment:</b> This section states that a certificate can be limited, suspended or revoked if the ESL declaration for an FSTD made by the organisation operating the FSTD is incomplete or incorrect. Section 2.3.2 states that “...the information contained in the ESL is for information purposes only.” These statements concerning the significance of the ESL seem to contradict each other.</p> <p><b>Justification:</b> Clarity required.</p>
1232	Appendix IV to ANNEX VI (Part-ARA) – Flight simulation training device qualification certifica	26 - 29	<p><b>Page No:</b> 26</p> <p><b>Paragraph No:</b> Appendix IV to ANNEX VI (Part-ARA) – Flight simulation training device qualification certificate</p> <p><b>Comment:</b> For consistency with A., C., and D. the semi colon “;” at the end of B. Primary reference document(s) (PRD(s)); should be replaced with a colon “:.”</p> <p><b>Justification:</b> Consistency</p>

			<b>Proposed Text:</b> B. Primary reference document(s) (PRD(s)):
1235	AMC2 ARA.GEN.200(a) (2) Management system	29 - 30	<p><b>Page No:</b> 30</p> <p><b>Paragraph No:</b> AMC2 ARA.GEN.200(a)(2), (2) (vi)</p> <p><b>Comment:</b> The text "...activities referred to in (i)-(iv) above..." needs to be updated.</p> <p><b>Justification:</b> Text update required.</p> <p><b>Proposed Text:</b> Change to "...activities referred to in (i)-(v) above..."</p>
1238	AMC4 ARA.FSTD.100(a) (1) Initial evaluation procedure	32 - 33	<p><b>Page No:</b> 32</p> <p><b>Paragraph No:</b> AMC4 ARA.FSTD.100(a)(1), (a)(2) (i), (ii) &amp; (iii)</p> <p><b>Comment:</b> References to BITD are still included for initial evaluations</p> <p><b>Justification:</b> BITDs will no longer be a recognised FSTD type.</p> <p><b>Proposed Text:</b> Remove references to BITD.</p>
1240	AMC4 ARA.FSTD.100(a) (1) Initial evaluation procedure	32 - 33	<p><b>Page No:</b> 33</p> <p><b>Paragraph No:</b> AMC4 ARA.FSTD.100(a)(1), (b)</p> <p><b>Comment:</b> This section references FNPT Type I which is no longer a recognised FSTD qualification level.</p> <p><b>Justification:</b> Clarity required.</p>
1243	AMC1 ARA.FSTD.100(b) Initial evaluation procedure	38 - 42	<p><b>Page No:</b> 38</p> <p><b>Paragraph No:</b> AMC1 ARA.FSTD.100(b)</p> <p><b>Comment:</b> It is not understood why the evaluation report doesn't have an entry for the FSTD training load version that was evaluated</p> <p><b>Justification:</b> Clarity required.</p>
1244	AMC1 ARA.FSTD.120(c) Continuation of an FSTD qualification	46	<p><b>Page No:</b> 46</p> <p><b>Paragraph No:</b> AMC1 ARA.FSTD.120(c), (c)</p> <p><b>Comment:</b> Paragraph (c) states:</p> <p>"The competent authority may vary the evaluation period for only one, several, or all the FSTDs upon the results of the oversight on the organisation operating the FSTDs or upon FSTD evaluations."</p> <p><b>We believe the text could be simplified as proposed below</b></p> <p><b>Justification:</b> Simplification and clarity.</p> <p><b>Proposed Text:</b> "The competent authority may vary the evaluation period for <b>any or all</b> the FSTDs upon the results of the oversight on the organisation operating the FSTDs or upon FSTD evaluations".</p>

1247	ORA.FSTD.105 Maintaining the FSTD qualification	52	<p><b>Page No:</b> 52</p> <p><b>Paragraph No:</b> ORA.FSTD.105, (a) (1) &amp; (2)</p> <p><b>Comment:</b> Some word changes are suggested below to improve use of English</p> <p><b>Justification:</b> To provide clarity</p> <p><b>Proposed Text:</b> (a)(1) - correcting the <b>items</b> identified during the authority evaluations (a)(2) - addressing the issues reported <b>when using the FSTD for training</b></p>
1249	ORA.FSTD.105 Maintaining the FSTD qualification	52	<p><b>Page No:</b> 52, 56, 82, 87 (and throughout)</p> <p><b>Paragraph No:</b> ORA.FSTD.105, ORA.FSTD.230, AMC1 ORA.FSTD.105(b), GM1 ORA.FSTD.110 (and others)</p> <p><b>Comment:</b> There are multiple (approximately 85) instances of slightly different references to tests, e.g. -  validation tests contained within the master qualification test guide validation tests, and functions and subjective tests QTG validation tests objective validation tests FSTD validation tests...</p> <p>It is not clear what set of tests in each of the above cases is comprised of i.e.  consists of just Objective tests; or consists of just Functions and Subjective tests; or consists of Objective plus Functions and Subjective tests</p> <p><b>Justification:</b> Consistency and clarity are needed when a given set of tests is being referred to.</p> <p><b>Proposed Text:</b> Use "MQTG Objective test" when referring specifically to objective tests Use "MQTG Functions and Subjective tests" when referring specifically to functions and subjective tests Use "MQTG Validation tests" when referring to a combination of objective and functions and subjective test.</p> <p>We suggest specific definitions should also be provided</p>
	ORA.FSTD.230 Changes to the qualified FSTD	55 - 56	
	AMC1 ORA.FSTD.105(b) Maintaining the FSTD qualification	82	
	GM1 ORA.FSTD.110 Modifications	87	
1264	ORA.FSTD.105 Maintaining the FSTD qualification	52	<p><b>Page No:</b> 52</p> <p><b>Paragraph No:</b> ORA.FSTD.105 (b)</p> <p><b>Comment:</b> This update seems to imply that F&amp;S checking is no longer required as part of the organisations responsibilities for maintaining the FSTD qualification. This is not understood if that is the intent.</p> <p><b>Justification:</b> Clarity required.</p>
1272	ORA.FSTD.225 Duration and continued	54 - 55	<p><b>Page No:</b> 54-55</p> <p><b>Paragraph No:</b> ORA.FSTD.225, (a) &amp; (c)</p>

	validity		<p><b>Comment:</b> References to BITD are still included.</p> <p><b>Justification:</b> BITDs will no longer be a recognised FSTD type.</p> <p><b>Proposed Text:</b> Remove BITD references.</p>	
1273	AMC2 ORA.FSTD.100 General	64 - 66	<p><b>Page No:</b> 65</p> <p><b>Paragraph No:</b> AMC2 ORA.FSTD.100, (b)</p> <p><b>Comment:</b> It would be clearer if this stated <i>when</i> the metrics should be provided each year.</p> <p><b>Justification:</b> Clarity required.</p>	
1276	CS FSTD(A).GEN.005 Terminology	114 - 126	<p><b>Page No:</b> 118 &amp; 126</p> <p><b>Paragraph No:</b> CS FSTD(A).GEN.005</p> <p><b>Comment:</b> The following text appears to have been inserted twice with slightly different definitions:</p> <p>Page 118 - 'Validation data 'means data used to prove that the FSTD handling qualities and performance correspond to those of the aeroplane or class of aeroplane as appropriate.</p> <p>Page 126 - 'Validation data' means data used to prove that the FSTD performance corresponds to that of the aircraft or class of aeroplane.</p> <p><b>Justification:</b> Correct typo</p> <p><b>Proposed Text:</b> Move text from page 118 to replace that on page 126.</p>	
1281	CS FSTD(A).GEN.005 Terminology	114 - 126	<p><b>Page No:</b> 118 &amp; 126</p> <p><b>Paragraph No:</b> CS FSTD(A).GEN.005</p> <p><b>Comment:</b> . The definition for 'Validation data roadmap' appears to be in the wrong place</p> <p><b>Justification:</b> To locate the definition in the correct order and make it easier to find if placed in alphabetical order.</p> <p><b>Proposed Text:</b> Move the following text from page 118 to after 'Validation data' on page 126 –</p> <p>'Validation data roadmap (VDR)' means a document from the aeroplane validation data provider that should clearly identify (in matrix format) the best possible sources of data for all required qualification tests in the QTG. It should also provide validity with respect to engine type and thrust rating and the revision levels of all avionics that affect aeroplane handling qualities and performance. For further information, please refer to CS FSTD(A).QTG.400.</p>	
1295	CS FSTD(A).GEN.010 Abbreviations	126 - 133	<p><b>Page No:</b> 131</p> <p><b>Paragraph No:</b> CS FSTD(A).GEN.010</p> <p><b>Comment:</b> Given new definitions of FSTDs we question whether the definitions</p>	

			<p>for 'OTD' and 'PTT' are still relevant</p> <p><b>Justification:</b> Relevance of definitions</p> <p><b>Proposed Text:</b> Remove definitions of OTD and PTT.</p>	
1296	CS FSTD(A).QB.101 FSTD levels and FCS	134	<p><b>Page No:</b> 134</p> <p><b>Paragraph No:</b> CS FSTD(A).QB.101, Table 1</p> <p><b>Comment:</b> Table 1 provides comparison with ICAO equivalent types, but it was noted that:</p> <p>for FFS D (Type VII) Sound and Motion Cues were Specific for the CS but Representative for ICAO for FNPT D (Type IV) Sound Cues were Generic for the CS but Representative for ICAO</p> <p>We recommend that alignment with ICAO should be considered</p> <p><b>Justification:</b> Non-alignment could cause a different standard of devices across the planet with the same indicated qualification level. It is noted that the difference could be due to different training requirements in FCL compared with ICAO.</p> <p><b>Proposed Text:</b> Either clarify that there is a difference to ICAO for these specific features or align with ICAO, e.g. include -</p> <p>(**) for FFS D the FSTD feature fidelity levels do not match ICAO FSTD Level Indicated for Sound and Motion Cues. (**) for FNPT D the FSTD feature fidelity levels do not match ICAO FSTD Level Indicated for Sound Cues.</p>	
1299	CS FSTD(A).QB.101 FSTD levels and FCS	134	<p><b>Page No:</b> 134</p> <p><b>Paragraph No:</b> CS FSTD(A).QB.101, Table 1</p> <p><b>Comment:</b> The Sound Cues requirement for FFS level D is shown as "S". However, none of the tasks shown in the table in <i>AMC3 to Appendix 9 Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs</i> have "S" as the Sound Cue requirement. If not needed for a type rating, it is not clear when fidelity level "S" is needed for Sound Cues.</p> <p><b>Justification:</b> Clarity required.</p>	
1302	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 143</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 2.1.G</p> <p><b>Comment:</b> It is not clear what the text "Modelling, aeroplane-like, not specific to class, model, type or variant." is referring to. It is noted that ICAO text is "Aerodynamic and engine modelling, aeroplane-like, to support the approved use."</p> <p><b>Justification:</b> Clarity needed</p> <p><b>Proposed Text:</b> Suggest amend to : "Aerodynamic and engine modelling that is not specific to aeroplane class,</p>	

			model, type or variant.”	
1307	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 143</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 3.1.S</p> <p><b>Comment:</b> If objective tests are going to be included in the ‘Comments’ column, we recommend all applicable tests, including the landings, should also be included as they are referred to in the text.</p> <p><b>Justification:</b> Consistency</p> <p><b>Proposed Text:</b> Suggest amend to read:</p> <p>See CS FSTD(A).QTG.105, tests 1.a.1,1.a.2,1.b.1 through 1.b.7, 1.e.1 through 1.e.4 and 2.e.1 through 2.e.5 Or Tests required. See CS FSTD(A).QTG.105</p>	
1312	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 148</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 5.1. S.a</p> <p><b>Comment:</b> Throughout, where applicable tests exist, they have been referenced in the ‘Comments’ column. In this case it is blank.</p> <p><b>Justification:</b> Consistency</p> <p><b>Proposed Text:</b> Suggest add:</p> <p>See CS FSTD(A).QTG.105, tests 2.a.1 through 2.a.9 Or Tests required. See CS FSTD(A).QTG.105</p>	
1313	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 148</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 5.1. S.b</p> <p><b>Comment:</b> Throughout, where applicable tests exist, they have been referenced in the ‘Comments’ column. In this case it just refers to test.</p> <p><b>Justification:</b> Consistency.</p> <p><b>Proposed Text:</b> Suggest add:</p> <p>See CS FSTD(A).QTG.105, tests 2.a.10 and 2.c.8 Or Tests required. See CS FSTD(A).QTG.105</p>	
1316	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 149-150</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 6.1.S, 6.1.R and 6.1.G</p> <p><b>Comment:</b> Throughout, where applicable tests exist, they have been referenced in the ‘Comments’ column. In this case it just refers to “Tests required. See CS</p>	



			<p>FSTD(A).QTG.105.”</p> <p><b>Justification:</b> Consistency.</p> <p><b>Proposed Text:</b> Suggest amend to read:</p> <p>“See CS FSTD(A).QTG.105, <b>tests 5</b>”</p>	
1317	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 159 to 171</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 9 throughout</p> <p><b>Comment:</b> For those cases where Environment -ATC is required, it is unclear whether a full SATCE simulation is required, however section 9.9.S seems to indicate it is.</p> <p><b>Justification:</b> Clarification required.</p>	
1319	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 160</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 9.S and 9.G</p> <p><b>Comment:</b> We question whether the comment “The ‘Environment — ATC’ feature is optional unless otherwise specified in Part-FCL for any given training task or type” is necessary</p> <p>We believe this is applicable for any requirement as it will either be required for training or not.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> We suggest deleting all of the text in comment field.</p>	
1321	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 174</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 11.3.G</p> <p><b>Comment:</b> There appears to be a formatting issue with the tick in column G</p> <p><b>Justification:</b> Typo</p>	
1324	CS FSTD(A).QB.110 FSTD general requirements for feature fidelity levels	135 - 181	<p><b>Page No:</b> 175</p> <p><b>Paragraph No:</b> Table 1, FSTD general requirements for feature fidelity levels, Section 12.R</p> <p><b>Comment:</b> The text “Specific airport models with topographical features to support the intended use” could be confusing when associated with a Representative Fidelity Level.</p> <p><b>Justification:</b> Clarification.</p> <p><b>Proposed Text:</b> Suggest replace with:</p> <p>“<b>Defined</b> airport models with topographical features to support the intended use”</p>	

1327	CS FSTD(A).QTG.105 Table of FSTD validation tests versus feature fidelity levels	203 - 255	<p><b>Page No:</b> 240-255</p> <p><b>Paragraph No:</b> CS.FSTD(A).QTG.105 Table of FSTD validation tests versus feature fidelity levels, Section 4.0 Visual System</p> <p><b>Comment:</b> The column headers in the Table of FSTD validation tests versus feature fidelity levels disappear from this page onwards.</p> <p><b>Justification:</b> Clarity.</p> <p><b>Proposed Text:</b> Recommend adding column headers from p240 – p255.</p>
1330	CS FSTD(A).QTG.105 Table of FSTD validation tests versus feature fidelity levels	203 - 255	<p><b>Page No:</b> 249, 253</p> <p><b>Paragraph No:</b> CS.FSTD(A).QTG.105 Table of FSTD validation tests versus feature fidelity levels, Section 5.a.1, 5.d, 5.e</p> <p><b>Comment:</b> Tolerance quoted for fidelity level “G” is “+/- 3db SPL RMS”. It is unclear what “SPL RMS” is</p> <p><b>Justification:</b> Clarity required.</p> <p><b>Proposed Text:</b> Please add some GM on SPL RMS.</p>
1333	CS FSTD(A).QTG.120 Engineering simulator validation data  GM1 CS FSTD(A).QTG.120 Engineering simulator validation data	275 - 276  276 - 278	<p><b>Page No:</b> 275, 276</p> <p><b>Paragraph No:</b> <u>CS FSTD(A).QTG.120 (a) &amp; GM1 CS FSTD(A).QTG.120 (b) (2)</u></p> <p><b>Comment:</b> It is unclear how acceptance of Engineering Data will be communicated to all other NAAs such that they are aware that lack of flight test data has been approved</p> <p><b>Justification:</b> Clarity required.</p>
1337	CS FSTD(A).QTG.120 Engineering simulator validation data  GM1 CS FSTD(A).QTG.120 Engineering simulator validation data	275 - 276  276 - 278	<p><b>Page No:</b> 275 &amp; 277</p> <p><b>Paragraph No:</b> CS FSTD(A).QTG.120, (a) &amp; GM1 CS FSTD(A).QTG.120 (b) (3)</p> <p><b>Comment:</b> It is not clear what degree of Engineering Simulator oversight is proposed? Typically, this auditing process ends at the point an approved initial VDR is issued as part of OSD (CS-SIMD).</p> <p><b>Justification:</b> Clarity required.</p>
1341	CS FSTD(A).QTG.260 Transport delay and latency testing methods	321 - 328	<p><b>Page No:</b> 322</p> <p><b>Paragraph No:</b> CS FSTD(A).QTG.260</p> <p><b>Comment:</b> There appears to be a formatting issue where the text: “compliance. Figure 1 presents the principles of transport delay and latency testing” comes after the figure and before the figure title.</p> <p><b>Justification:</b> Typo</p> <p><b>Proposed Text:</b> Relocate the figure to below the above text.</p>
1342	CS	336	<p><b>Page No:</b> 339</p>

FSTD(A).QTG.500 - Additional/alterna engines or avionics validation data	341	<b>Paragraph No:</b> CS FSTD(A).QTG.500 (d) (1)&(4)
		<b>Comment:</b> It is unclear how this will work for previously approved VDRs where the required flight test data for the alternative engine git is not available
		<b>Justification:</b> Clarity required.