Standards for helicopter devices used to conduct training in multi-crew cooperation (MCC) (CD 1813FS)

Overview

With the commencement of Part 61 of CASR – *Flight Crew Licensing*, CASA introduced several changes to ensure Australian flight crew licences comply with the standards specified by the International Civil Aviation Organisation (ICAO) in Annex 1 – *Personnel Licensing*.

The changes included a requirement for a person to pass a flight test for the issue of an Airline Transport Pilot Licence (ATPL). As the flight test requires the applicant to demonstrate competency in both technical and non-technical skills, the applicant must complete a course of training in multi-crew cooperation (MCC) or equivalent training accepted by CASA.

To ensure the safety benefits of MCC training are realised, the proposed standards describe a flight simulation training device (FSTD) that represents a generic multi-engine helicopter that is equipped to be operated by two pilots. The FSTD provides an effective platform for the delivery of scenario-based MCC training where students can develop and demonstrate non-technical skills in a simulated operational environment.

As MCC training is new to Australia, the existing standards for an FSTD suitable for MCC training, exceed the proposed standards, incurring significantly higher acquisition and operating costs. Under regulation 61.045 of CASR – *Prescription of qualification standards for flight simulation training devices*, CASA may specify minimum standards for an FSTD used to conduct a CASA approved course of training. CASA has previously prescribed minimum standards for an FSTD that may be used to conduct MCC training designed for pilots of multi-crew aeroplanes.

The proposed standards

An operator seeking approval to conduct a course of training in MCC for helicopter pilots, is required to conduct the training using an FSTD in which pilots can develop and demonstrate non-technical skills, operating a generic multi-engine helicopter configured for multi-crew operations. An FSTD that meets the proposed standards, will have sufficient fidelity or realism to simulate complex operational scenarios, with lower operational and acquisition costs.

The proposed standards are lower than the standards specified by EASA under CS-FSTD-H for MCC training as CASA does not require MCC training to be integrated with a course of training for a helicopter type rating.

Recent industry feedback

The MCC-Helicopter device standards have been developed from discussions with several industry training providers, Australian FSTD manufacturers and representatives from foreign FSTD manufacturers.

The proposed standards are similar to the standards for the MCC devices used for multi-engine aeroplane MCC training.

Why we are consulting

CASA recognises the valuable contribution community and industry consultations make to the regulatory development process. Please take this opportunity to give your views on this regulatory proposal.

This consultation is seeking feedback from industry on the proposed standards for an FSTD, that:

- represents a multi-engine helicopter configured for multi-crew operations
- may be used to conduct an approved course of training in MCC for pilots licensed to fly helicopters.

Documents for review

A copy of all the documents related to this consultation are provided below in the 'Related Documents' section. These documents include:

- Summary of proposed change CD 1813FS
- Proposed Legislative Instrument *draft FSTD MCC helicopter training standards* (this instrument will be published under CASR 61.045 Prescription of qualification standards for flight simulation training devices).
- a downloadable MS Word and PDF copy of this consultation for ease of distribution and feedback within your organisation.

You will also find a copy of the instrument on the page on which we request your feedback.

Please read the Summary of proposed change CD 1813FS and the proposed instrument before providing your feedback in the online survey.

Closing date for comment

Comments on the draft FSTD MCC helicopter training standards should be submitted through the online response form by close of business **28 March 2019**.

What happens next

Once the consultation has closed, we will register and review each submission received through the online response form. We will make all submissions publicly available on the Consultation Hub, unless you request that your submission remain confidential. We will also publish a summary of consultation which summarises the feedback received.

All responses will be considered, and the instrument modified and finalised accordingly. The standards will be published by CASA in a Legislative Instrument (LI) under regulation 61.045 of CASR. The instrument will be used to determine if an operator, proposing to use the device, can be authorised under Part 142 of CASR to conduct MCC training.

CASA anticipates the proposed standards will be incorporated into the standards specified in Part 60 MOS – Flight Simulation Training Devices, in the future.

Information about how we consult and how to make a confidential submission is available on the <u>CASA website</u>.

To be notified of any future consultations, you can subscribe to our <u>consultation and</u> <u>rulemaking mailing list</u> <https://mailinglist.casa.gov.au/?p=subscribe&id=3>.

Page: About this consultation

This consultation asks for your feedback on the proposed standards for helicopter training devices, used in the conduct of Multi-Crew Cooperation (MCC) training for helicopter pilots.

We will ask you for:

- **personal information**, such as your name, any organisation you represent, and your email address
- your consent to publish your submission
- your responses to the proposed standards
- any comments you may want to provide
- **demographic information** to help us understand your interest in the regulations

Our <u>Website</u> <https://www.casa.gov.au/rules-and-regulations/landing-page/consultationprocess> contains more information on making a submission and what we do with your feedback.

Personal information

First name

(Required)

Last name

(Required)

Email address

If you enter your email address, you will automatically receive an acknowledgement email when you submit your response.

Email

Do your views officially represent those of an organisation?

(Required)

Please select only one item

□ Yes

🗆 No

If yes, please specify the name of your organisation.

Which of the following best describes the group you represent?

Please select only one item

- $\hfill\square$ Training provider
- □ Pilot/Instructor
- □ FSTD manufacturer/supplier/agent
- \Box Other (please specify below)

Other

Consent to publish submission

In order to promote debate and transparency, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

- your name, if the submission is made by you as an individual or the name of the organisation on whose behalf the submission has been made
- your responses and comments

We **will not** include any other personal or demographic information in a published response.

Information about how we consult and how to make a confidential submission is available on the <u>CASA website</u> <https://www.casa.gov.au/rules-and-regulations/landing-page/consultation-process>.

Do you give permission for your response to be published? (Required)

Please select only one item

□ Yes - I give permission for my response/submission to be published.

 $\hfill\square$ No - I would like my response/submission to remain confidential but

understand that de-identified aggregate data may be published.

 \Box I am a CASA officer.

Page: Feedback on Standards for helicopter devices used to conduct training in multi-crew cooperation (CD 1813FS)

Q1

Do you agree with the proposed standards for an FSTD used to conduct MCC training for helicopter pilots?

Please select only one item

- □ Agree
- □ Agree with changes (please specify suggested changes below)
- □ Disagree (please detail your reasoning and alternative suggestions below)
- \Box No opinion

Please provide any comments you may have on the proposed policy.

Q2

Do you think CASA should require that a device used for MCC training meet the European Aviation Safety Agency (EASA) standards for Flight Navigation Procedure Trainer (FNPT) MCC devices, when the MCC training is integrated into a course of training for a type rating?

Link : EASA Document - Certification Specifications for Helicopter Flight Simulation Training Devices (CS-FSTD(H))

Please select only one item

- \Box Yes
- □ Yes, with changes (please specify suggested changes below)
- □ No (please detail your reasoning and alternative suggestions below)
- \Box No opinion

Please provide any comments you may have on the proposed policy.