



January 7, 2014

Comment on Proposed Policy Change. Docket FAA-2013-0809

The Society of Aviation Flight Educators (SAFE) respectfully submits the following comments pertaining to: **Notice of Policy Change for the Use of FAA Approved Training Devices.**

The nature of SAFE, the commenting organization:

These comments are provided by the Society of Aviation and Flight Educators. SAFE is one of the nation's pre-eminent organizations of aviation educators whose expertise covers the entire spectrum of flight training from student through Airline Transport Pilot. Our over 850 members include Master CFI's, FAA Designated Pilot Examiners, FAASTeam Safety Program Managers and Representatives, FAA Gold Seal instructors, professors and administrators from numerous college and university aviation programs, and both professional and general aviation pilots. SAFE and its members are committed to enhancing aviation safety through the development of professional standards in aviation education and delivery of the highest quality flight instruction possible.

Issues Addressed:

It appears to SAFE that FAA's Notice of Policy Change can be reduced to the following topics:

1. The FAA has determined that it is necessary to ensure all approved devices meet current standards contained in AC 61-136 (issued in July 2008) and are consistent with existing regulations. As such, all manufacturers of devices (including ground trainers, PCATD, FTD level 1-3, and ATDs) who currently hold an LOA (or any other official method of approval) must apply for a new LOA. By January 1, 2015,
2. After January 1, 2015, all LOAs previously issued prior to August 23, 2013, for training devices approved to meet requirements under parts 61 and 141 will terminate. **This means that experience obtained in these devices may no longer be credited toward aeronautical experience or currency requirements in parts 61 and 141.** (bold)

type added by SAFE.) The FAA notes that, as part of this process, renewed LOAs (as well as any LOA issued for a new device) will contain limitations for instrument training that are consistent with the express aeronautical experience limits for an instrument rating found in § 61.65 and appendix C to part 141.

3. After this date, (January 1, 2015) **no applicant for an instrument rating may use more than 10 hours of instrument training in an ATD toward the minimum aeronautical experience requirements** required to take the practical test for an instrument rating. In addition, **no graduate of a training program approved under appendix C to part 141 may credit more than 10% of the required coursework in ATDs** (unless that program has been approved in accordance with § 141.55(d) or (e)) (bold type added by SAFE).

SAFE Comments:

1. SAFE believes that the implementation of the proposed Policy Change has no concern for safety, and further that this Change would bring a degradation to the safety of flight currently being achieved under current letters of authorization.
2. This policy change is contrary to the **intent** of current letters of authorization.
3. It creates undue burden on industry by forcing them to revert to prior interpretations.

SAFE believes that the Policy Change will have a strong negative impact on safety of flight, that it will cause a degradation of the proven safety benefits of the use of ATDs, and that it will negatively impact flight training in general and the flight training industry in particular. The devices impacted are widely used in general aviation flight schools, universities and colleges within flight training programs across the country. We estimate that the number of devices that could be negatively affected to be in the thousands.

Considering the fact that virtually all of the aforementioned facilities are providing training with ATDs that have LOAs and have already been granted an exemption, forcing them to reapply for an exemption would create an undue burden on an industry that is already under economic stress, with no commensurate gain in aviation safety.

We would like to note that these devices have been in use for over thirty years. In that time thousands of pilots have trained on, and been credited for training, on BATDs and AATDs as well as FTDs levels 1-3 which have been approved for use through an LOA issued by the FAA. After twelve years of utilization it has been found that pilots trained with these devices have an

enhanced and faster transfer of knowledge along with a substantially better understanding of the flight tasks at hand. Additionally, the time it takes to earn a rating through the use of an ATD has been reduced dramatically. (It is interesting to note that every hour trained in a flight -training device automatically contributes to the safety of flight statistics based on the fact that an FTD “crash” does not yield fatalities.)

SAFE Recommendations:

1. Rescind the FAA proposed Notice of Policy Change for the Use of FAA Approved Training Devices.
2. That all FTDs currently being operated under an exemption be allowed to continue to be used within the guidance of said exemption and without limitation, until such time as the FAA can issue new rule making that fixes all areas of concern.

While SAFE feels that the proposed Policy Change will not lead to the safer flight environment the FAA seeks, SAFE stands ready to work with the FAA, and other interested organizations, to help develop specific, meaningful rule making that corrects all of the misunderstandings inherent in the current regulations relative the use of flight training devices.

Respectfully submitted,
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Society of Aviation and Flight Educators