



## COMMENT RESPONSE DOCUMENT NPA FOR DCP 2023-002 – DASR NTS ‘NON-TECHNICAL SKILLS’

### INTRODUCTION

1. **General.** This Comment Response Document (CRD) outlines DASA’s agreed regulation position and finalises the public consultation process in respect of Notice of Proposed Amendment (NPA) for DCP 2023-002. DASA will consider arguments opposing the views expressed in the CRD only in exceptional circumstances. Any member of the regulated community having arguments to support an appeal against the decisions documented in this CRD may petition DASA.
2. **Background.** DASA released NPA 2023-002 (*DASR NTS ‘Non-Technical Skills’*) for regulated community comment on 10 Aug 23. The period for public comment on the proposals contained in this NPA closed on 08 Sep 23. DASA subsequently consulted with each environmental command HQ and respondent to ensure the DASA responses to NPA feedback were acceptable.

### ANALYSIS OF COMMENTS

#### General

3. DASA received 118 responses to the NPA 002/2023. The comments are individually listed in Annex A together with their corresponding DASA response.

#### Environmental command endorsement positions

4. Environmental command HQs provided endorsements to NPA 2023-002 as follows:
  - a. HQ AC and HQ FAA advised the proposal was acceptable, but would be improved if DASA made the changes detailed in Annex A
  - b. HQ AVNCOMD accepted the proposal without change.
5. **DASA response.** DASA accepted and incorporated the majority of feedback into the revised regulation. DASA forwarded the revised draft back to each environmental command HQ, and received subsequent endorsement.

#### Environmental command resource implications

6. Environmental command HQs advised that additional resources are not required as a result of NPA 2023-002.
7. **Transition plan.** DASA incorporated a transition plan with the update to *DASR NTS*. In this plan, DASA will provide a 24-month transition period, commencing on the date of publication of *DASR NTS*. This transition period will allow the regulated community to make the necessary changes to their management systems. DASA will not enforce compliance with *DASR NTS* when conducting oversight activity during the transition period. DASA will consider extensions to the transition period on request.



## AUTHORITY

8. The content of this Summary of Responses has been reviewed and is authorised.

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### **Annex:**

- A. NPA 2023-002: *DASR NTS Non-Technical Skills* – Regulated Community Feedback



NPA 2023-002 DASR NTS NON-TECHNICAL SKILLS – REGULATED COMMUNITY FEEDBACK

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
1	GM NTS.20(b)1	Individual: FSGT Lawson		Para e – remove the requirement for initial knowledge based NTS training staff to be instructor qualified.	<p>I am assuming the “initial” refers to the Foundation course P000666.</p> <p>I facilitate non-aircrew courses (60 courses so far, over 1000 students) for RAAFSAULT, CSG, AMG &amp; ACG and do not hold an Instructional qualification.</p> <p>Requiring NTSF to hold an Instructional qualification would add another layer of prerequisites to the course. Most instructional courses last 5 days and would add no long-term value to the facilitation of the NTS Foundation course.</p>	<p>DASA retained the requirement for initial knowledge based NTS training staff to be instructor qualified.</p> <p>ADF-P-7 <i>Learning Doctrine</i> defines instruction and facilitation as distinctly different methods to impart learning. Instruction is the direct teaching of knowledge to a passive learner, with the <i>instructor</i> controlling what is taught, how and when. Learners are required to gain <i>new</i> knowledge and skills. Facilitation instead provides a collaborative opportunity to test <i>prior</i> knowledge and skills in a safe environment. Foundation learners - those who have had no NTS training, or no NTS training in the context of operations undertaken by that platform - are considered to have no prior NTS skills and knowledge. Therefore, initial knowledge-based NTS training should be delivered through instruction by someone with an instructor qualification.</p> <p>The instructor qualification does not need to be related to aviation. For example, personnel who have completed ADF Instructors Course, a specialist instructor course (ie Driver or Shooter Instructor) or Cert IV in TAE may meet this requirement.</p>
2	NTS.10 GM Purpose	Individual: FLTLT B. King		Make it clear that the purpose of NTS training is to give defence members the skills they need to safely and effectively manage the threats and errors encountered during the conduct of work.	The ICAO human factors manual 1998 as well as all western aviation regulators are clearly state that the purpose of someone’s NTS is to manage the threats and errors people are exposed to during the conduct of their work.	<p>DASA amended the purpose statement as follows:</p> <p><b>Purpose. (Context)</b> <i>The safe and effective delivery of Defence Aviation capabilities is enhanced by human performance skills that promote reliable and effective task performance in teams and in complex work systems (ie NTS). (Hazard) Suitability For Flight can be compromised by the inability to recognise and manage threats, errors and human performance limitations. (Defence) This regulation requires AMs, Sponsors and UAS Operators to address NTS-related safety risks in the operating environment to ensure Suitability For Flight.</i></p>
3	GM NTS.10(a)	Individual: FLTLT B. King		Again ‘manage threats and errors more safely and effectively.’		<p>DASA incorporated the suggestion, amending the wording of GM NTS.10(a)b as follows:</p> <p><i>NTS training is one example of applied HF training. NTS training provides personnel with the awareness, knowledge and skills required to manage threats and errors more safely and effectively.</i></p>
4	GM NTS.10(b)4(ii)	Individual: FLTLT B. King		This is going to have very little impact to the safety of peoples work. It will just make work for the UASOs. If you want something that will make a difference in its place then consider the following: ensuring NTS lessons learned from investigations, both internally and from other organisations, applied to the training system where appropriate.		<p>DASA incorporated the suggestion, amending the wording of GM NTS.10(b)4(ii) as follows:</p> <p><i>ensuring NTS lessons learned from investigations, both internally and from other organisations, are disseminated widely (eg through safety notices, briefings or training) and incorporated into the FMS (or equivalent) where appropriate.</i></p>

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5	GM NTS.20(a)4	Individual: FLTLT B. King	GM NTS.10(b)4.iii(b)	You need to put a number on this.	No more than 15 people per session. If you don't put a number on it then you will have sqns doing this in a room of 50 people on a safety stand down.	DASA incorporated the suggestion, amending the wording of GM NTS.20(a)4 (renumbered as GM NTS.20(a)3.ii) as follows:  <i>Periodic NTS bridging training should be conducted informally in the non-operational environment away from the pressures of the usual working environment, so that the opportunity is provided for personnel to interact and communicate in an environment conducive to learning. Periodic NTS bridging training should be facilitated through small dedicated group sessions (eg no more than 15 personnel). Alternatively, periodic NTS bridging training may be integrated into other training programs, such as NTS continuation training, Aviation Safety days or those outlined within the operator's SMS. NTSF or NTST should use a risk-based approach, relevant case studies and Aviation Safety Events to tailor the training and to encourage the exchange of ideas and concepts regarding topical and emerging NTS issues.</i>
6	GM NTS.20(a)4	Individual: FLTLT B. King	AMC NTS.10(c)1(b)iii	Add instructors who do NTS skill development also need to cover NTS training, assessing and remediation techniques.		DASA added the following AMC:  <i>iii. during their knowledge-based continuation NTS training refresh their knowledge in NTS instruction and assessment..</i>
7	GM NTS.20(a)6	Individual: FLTLT B. King		Skills based performance focuses on how well NTS are used to manage threats and errors are managed in an operational environment.		DASA notes the response.
8	GM NTS.20(b)1	Individual: FLTLT B. King		I think allowing facilitators to not have specialised HF and NTS training can lead to a facilitator not having the knowledge they need to provide training.		DASA has not changed the requirements for NTSF.  NTSF are not required to undergo specialised HF and NTS training. However, they should have the right attitude, behaviours, knowledge and skill including: i. an interest in HF and NTS ii. possessing suitable communication and presentation skills iii. having sufficient operational experience to facilitate conversations around operational issues (ie proficient Aircrew or equivalent) iv. being someone respected by the cohort being trained.  Additionally, if an NTSF is delivering initial knowledge-based NTS training, they require a Defence instructional qualification.
9	General	DD ANSP		References to FMS throughout – ANSP does not have an FMS. Suggest including "(or equivalent)" after references to FMS.		DASA added '(or equivalent)' to all instances of FMS.
10	NTS.20(a)1	DD ANSP	NTS.10(b)4.i	Suggest change to "initial knowledge-based training..." for clarity and consistency with AMC & GM titles		DASA amended the wording as suggested.

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11	GM NTS.20(b)1.f	DD ANSP	AMC NTS.10(c)1b	<p>The list at GM NTS.20(b)1.f.i is overly restrictive for ATC – it is likely that many ATC FLT's will have limited QCIs/ATC Instructors (and some may have none at all).</p> <p>Recommend adding ATC Supervisors and/or Training Officers to this list (as an equivalent to Flying Supervisors). All ATC Supervisors and Training Officers are required to complete ATC Advanced Training Course which covers HF techniques.</p>	<p>AMC NTS.20(b)1 states: The AM may meet NTST training requirements by ensuring that personnel complete one of the following courses:</p> <ol style="list-style-type: none"> <li>i. the Aviation NTS Trainer Course conducted by DFSB</li> <li>ii. a Defence Instructor Course that delivers equivalent learning outcomes to the DFSB NTS Trainer Course</li> <li>iii. a course of training that delivers equivalent learning outcomes to the DFSB NTS Trainer Course.</li> </ol> <p>GM NTS.20(b)1.f states: Additionally, NTST should:</p> <ol style="list-style-type: none"> <li>i. hold one of the following aviation qualifications: <ol style="list-style-type: none"> <li>a. Aircrew Instructors (ie QFI etc)</li> <li>b. Check or Training Aircrew</li> <li>c. Simulator Instructors</li> <li>d. Flying Supervisors</li> <li>e. ATC Instructors</li> <li>f. Airborne Instructional Technique (AIT) training</li> </ol> </li> </ol>	DASA added ATC Supervisors and ATC Training Officers to the list at AMC NTS.20(b)1b.i
12	NTS.10(a)	HQ-FAA	NTS.10(a)	Amend NTS.10 to read – '(a) The MAO, Sponsor, persons authorising and operators of a UAS, an ANSP or ABMO must utilise defined management controls . . . '	Air Battle Management Organisation (ABMO), once established under NPA 2022-19, are included under NTS in DASR NTS.20 (a) 1.(iii) and will include aircraft controllers within ABMO's (DASR NTS.10 (b)1. (iii)). Further requirements of NTS will then be the responsibility of ABMO AM.	DASA added 'ABMO' to NTS.10(a) as suggested.
13	GMs throughout	HQAC		The Purpose para of Context, Hazard, Defence for GM should be used more throughout. Have DASA decided to no longer employ the concept to the same extent?	DASR AVFM is a good example of how this works well.	DASR convention is to include a purpose statement for each DASR Part. The purpose statement provides the context of the hazard which the Part is addressing. Therefore, DASA has not incorporated a purpose paragraph more throughout DASR NTS.

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14	GM NTS.10 Defence and other multiple instances throughout Part.	HQAC	NTS.10(a)	Is AM the correct terminology?	Is this trying to group the 'MAO, Sponsor, UAS Operator, or ANSP' under a single term? Does it conflict with the DASP defn of AM?	<p>DASA amended NTS.10(a) as follows:</p> <p><i>The MAO-AM, Sponsor, UAS Operators, ANSP-AM and ABMO-AM must utilise defined management controls to eliminate NTS safety risks SFARP and, if it is not reasonably practicable to do so, to minimise those risks SFARP.</i></p> <p>Additionally, DASA replaced the term 'AM' throughout with 'AM, Sponsor and UAS Operator' or 'AM, Sponsor or UAS Operator' (as applicable).</p> <p>Further, DASA added the following to GM NTS.10(a) and renumbered accordingly:</p> <p><i>AMs, Sponsors and UAS Operators are identified in the Organisation Compliance Statement, and are accountable for maintaining NTS safety standards. UAS Operators refers to the accountable person in respect of UAS operations within a Defence unit or organisation, not the Remote Pilot.</i></p>
15	NTS.10(a)	HQAC	NTS.10(a)	The MAO, Sponsor, <del>persons authorising and operators of a</del> UAS Operator, or ANSP must .....	UAS Operator is a definition from GM3 UAS.10.1.c that is less unwieldy than the phrase 'persons authorising and operators of a UAS' and seems appropriate. Comma inserted before 'or ANSP' for clearer delineation of the listed entities.	LSN 14 refers.
16	NTS.10(a)	HQAC	NTS.10(a)	Should ABMO also be included in list of entities?		DASA added 'ABMO' to NTS.10(a). LSN 12 refers.
17	NTS.10(b)1	HQAC		Should Aircraft Battle Managers be specified, or are they included under Aircraft Controllers?	ABMs are included in NTS.20(a).1.(iii)	DASA has not specifically listed Air Battle Managers. 'Aircraft Controllers' includes Air Battle Managers and is the terminology used in DASR ABM.
18	NTS.10(b)1	HQAC		Given that the DFSB <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> guidebook includes NTS considerations for engineering and maintenance personnel, why are they not also included?		DASR NTS is a regulation for Operations Personnel. Maintenance and engineering NTS training is regulated under DASR 145.A.30(e). Therefore, DASA has not included NTS considerations for engineering and maintenance personnel.

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19	GM NTS.10(b)3	HQAC	GM NTS.10(b)2	This GM does not read as well as it could. Replace with the same format and (amended) content to match the equivalent approach in DASR AVFM.	The GM and AMC for AVFM.20.B.(4) use the Context, Hazard, Defence format, and better words in the body to describe the role of the DAVFMG which is that Part's equivalent of the DASA (or DFSB? (which is also used elsewhere in the Part)) NTS guidebook.  Use of the term 'exemplar operators' does not make sense in the context of the rest of the GM.	DASR convention is to not use the Context, Hazard, Defence format in sub-Part GM (LSN 13 refers).  However, DASA amended the wording of the GM as follows:  <i>AMs, Sponsors and UAS Operators should benchmark aviation NTS risk management against information and solutions used by exemplar operators with comparable CRE, to develop their own local, contextualised solutions. While AMs, Sponsors or UAS Operators can use information from any DASA-recognised MAAs and CAAs to assist with the development of a DASR-compliant NTS risk management solution, DASA developed the Aviation Non-Technical Skills: Fundamentals for Aviation Professionals and Aviation Non-Technical Skills: Essentials for Trainers guidebooks for ADF aviation commanders and managers, summarising relevant global benchmark information. These guidebooks align with ICAO's Standards and Recommended Practices (SARPS) and reflect Defence's unique NTS context. Both are available from the DASA website.</i>
20	GM NTS.10(b)3	HQAC		Are there two Guidebooks?	Only <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> is available on the DFSB website.	DFSB will publish two guidebooks: <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> and <i>Aviation Non-Technical Skills: Essentials for Trainers</i> . The <i>Aviation Non-Technical Skills: Essentials for Trainers</i> guidebook will be published with the revised DASR NTS.
21	NTS.10(b)4(iii)	HQAC	GM NTS.10(b)3(iii):	There should be a GM to provide an indication of why and how NTS should be integrated into an organisation's QMS, or delete altogether.	There is a corresponding GM in the DASR AVFM.	DASA added the following GM to NTS.10(b)4(iii):  <i>AMs, Sponsors and UAS Operators have regulatory requirements to ensure compliance and conformance. A functioning QMS enables the AM, Sponsor and UAS Operator to be reasonably informed about the level of compliance and conformance of their organisation, to ensure they are meeting their responsibilities under the DASR. The AM, Sponsor and UAS Operator's QMS should include quality planning, quality assurance, quality control and quality improvement for all NTS training.</i>
22	GM NTS.20 para b	HQAC		Is there a DFSB <i>Aviation Non-Technical Skills: Essentials for Trainers</i> guidebook?	Only <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> is available on the DFSB website.	LSN 20 refers.
23	AMC NTS.20(a)1a	HQAC	GM NTS.10(c)1h.i	If per GM NTS.20(b)1h.i, third-party-delivered initial knowledge-based NTS training content only has to cover the topics detailed in GM NTS.20(a)1, why are MAOs, etc, only allowed to present the DFSB Aviation NTS Foundation Course? Request that the Foundation Course requirement is removed, and MAO be given latitude to employ any course so long as it meets outcomes.		DASA amended the wording of GM NTS.20(b)1h.i as follows:  <i>initial knowledge-based NTS training as detailed in AMC NTS.20(a)1</i>  LSN 32 addresses the retention of NTS Foundation Course.

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24	AMC NTS.20(a)1a	HQAC		Why does an NTSF need a Defence Instructor qualification to deliver initial training? Request remove requirement.		LSN 1 refers.
25	AMC NTS.20(a)1ai and other instances of the use of DFSB to deliver NTS courses.	HQAC		What qualifications do DFSB personnel have who deliver the DFSB Aviation NTS Foundation Course? Are they considered a Third-party? How do they meet the requirements of the regulation?		DFSB personnel that deliver NTS training will, by virtue of appointment to DFSB, meet the regulatory requirements of an NTST. As an example, position number 346648 is required (amongst other experience and qualifications) to hold or have held an instructional qualification and to have undergone specialised HF and NTS training.
26	AMC NTS.20(a)1a	HQAC	AMC NTS.10(b)4(i)	... complete the DFSB Aviation NTS Foundation Course...	Inserting 'DFSB' matches the GM.	DASA incorporated the suggestion.
27	GM NTS.20(a)1	HQAC	AMC NTS.10(b)4(ii)	...and other aviation-related supplemental training courses.	What are 'supplemental' courses? This word does not appear in the description of the Course on the DFSB webpage, or in the relevant para in the DASM. Suggest delete.	DASA incorporated the suggestion.
28	GM NTS.20(a)2a	HQAC	AMC NTS.10(b)4(ii)	The training exception exemption ..... .....apply an exception exemption is .... .....application of exceptions exemptions.	The para is about the granting of exemptions, not exceptions.	DASA incorporated the suggestion.
29	AMC NTS.20(a)3a.iii	HQAC		Is there a DFSB <i>Aviation Non-Technical Skills: Essentials for Trainers</i> guidebook?	Only <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> is available on the DFSB website.	LSN 20 refers.
30	AMC NTS.20(a)3a.iii	HQAC	GM NTS.10(b)4(iv)a	Delete the second sentence that describes the guidebook.	This is more like GM content than AMC, and is also unnecessary.	DASA incorporated the suggestion.
31	AMC NTS.20(a)3a.iv	HQAC		Only delivered by an NTS Trainer; why not a Facilitator as well per the initial training?		LSN 117 refers.  DASA notes HQAC concern that the changes at LSN 117 do not provide sufficient flexibility for the MAO, ANSP and ABMO.
32	NTS.20(a)4	HQAC	AMC NTS.10(b)4(v)	continuation knowledge-based training conducted every two years	MAOs, etc, should be allowed to set their own currency period based on their own CRE and benchmarking against comparable international practice.	This is an extant requirement. DADR NTS does not alter this requirement. The Defence Aviation Safety Manual (DASM) provides the current corporate solution (AMC) for NTS continuation training required for compliance with AIRCREW.55. DASM Part 4 states that Defence ASMS training objectives for continuation NTS training are satisfied by completing the Aviation NTS Foundation Course at less than two yearly intervals.  MAOs, ANSPs and ABMOs may set an interval of less than two years based on their own CRE and benchmarking against comparable international practice. LSN 35 refers



33	AMC NTS.20(a)4a	HQAC	AMC NTS.10(b)4(v)  GM NTS.10(b)4(iii)(b)	<p>... personnel complete the Aviation NTS Continuation Course continuation training ... i. —DFSB</p>	<p>There is not an official Aviation NTS Continuation Course and therefore use of 'the' prior to naming the course is incorrect, and it should only refer to continuation training. Flexibility should be available wrt the content and structure of the continuation training and therefore no specific course should be imposed.</p>	<p>DASA amended AMC NTS.20(a)4a (renumbered as AMC NTS.20(a)5a) as follows:</p> <p><i>The AM, Sponsor and UAS Operator may meet knowledge-based NTS continuation training requirements by ensuring that personnel complete either:</i></p> <ul style="list-style-type: none"> <li><i>i. DFSB developed NTS continuation training</i></li> <li><i>ii. a course of continuation training that delivers equivalent learning and assessment outcomes to the DFSB developed NTS continuation training.</i></li> </ul> <p>Additionally, DASA:</p> <ul style="list-style-type: none"> <li>a. combined the extant GM NTS.20(a)4b and GM NTS.20(a)7b, renumbering as GM NTS.20(a)3.ii and amended as follows: <ul style="list-style-type: none"> <li><i>Periodic NTS bridging training is conducted informally in the nonoperational environment away from the pressures of the usual working environment, so that the opportunity is provided for personnel to interact and communicate in an environment conducive to learning. Periodic NTS bridging training should be facilitated through small dedicated group sessions (eg no more than 15 personnel). Alternatively, periodic NTS bridging training may be integrated into other training programs, such as NTS continuation training, Aviation Safety days or those outlined within the operator's SMS. NTSF or NTST should use a risk-based approach, relevant case studies and Aviation Safety Events to tailor the training and to encourage the exchange of ideas and concepts regarding topical and emerging NTS issues.</i></li> </ul> </li> <li>b. amended the second sentence of GM NTS.20(a)4a (renumbered as GM NTS.20(a)5) as follows: <ul style="list-style-type: none"> <li><i>It is widely acknowledged that the science associated with NTS and HF continues to advance and therefore without ongoing continuation training and reinforcement, knowledge decays. The periodic assessment of NTS theories and concepts is used to ensure that an individual's level of NTS knowledge remains contemporary.</i></li> </ul> </li> <li>c. amended GM NTS.20(a)4b (renumbered as GM NTS.20(a)5b) as follows: <ul style="list-style-type: none"> <li><i>Continuation NTS training should refresh, advance and assess knowledge on topics including as a minimum:</i></li> </ul> </li> </ul>
34	GM NTS.20(a)4a.d	HQAC	NTS.10(b)4(v)	<p>A two-year NTS Currency period allows the AM to set appropriate compliance periods and aligns with international practice. The AM may impose more stringent currency periods.</p>	<p>These sentences do not make sense if the currency period <u>is</u> two years, but rather to if the currency period is a <u>maximum</u> of two years. Given that we request the length stipulation in the Part be</p>	<p>DASA retained the sentences and amended the wording of NTS.20(a)4 (renumbered as NTS.20(a)5) as follows:</p>

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					removed altogether, leave only the existing final sentence that advises consideration of function and roles when determining an appropriate Currency interval.	<p><i>continuation knowledge-based training conducted no less frequently than every two years</i></p> <p>DASA has set a maximum interval of two years based on extant and international practice. LSN 32 and 35 refer.</p>
35	GM NTS.20(a)4a.d	HQAC		What are the examples of international practice; are they definitive in stating two years?	For instance, CASA AC 119-12 v1.0, <i>Human factors principles and non-technical skills training and assessment for air transport operation</i> , para 7.7.3, uses two years only as an example, and also suggests up to three years for a rolling program.	<p>DASM Part 4 sets an interval of less than two years for NTS continuation training.</p> <p>UK MAA – RA 1440 requires two yearly NTS/HF continuation training.</p> <p>CASA AC 119-12 v1.0 recommends an interval of two years. Alternatively, the AC recommends that where operators choose other currency schedules, such as a cyclic training and assessment schedule, the cyclical training schedule should 'cover a sub-set of the course content at more frequent intervals with the intent that all content is covered over an extended period (e.g. annual refresher training where all course content is covered over a three-year period).</p> <p>FAA 14 CFR § 121.913 requires NTS training to be conducted during every 'continuing qualification cycle'. The continuing qualification cycle for pilots in command, seconds in command, flight engineers, aircraft dispatchers, instructors, evaluators, and flight attendants, is 24 months. The FAA may approve an extension to 36 months.</p>

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36	NTS.20(a)5	HQAC	GM NTS.10(b)4(vi)	... grant a maximum Currency extension of up to one year	Where has the period of one year been derived from? The maximum extension period should be at the discretion of the MAO, etc.	<p>DASA benchmarked the maximum of one-year extension from CAA regulations. LSN 35 refers.</p> <p>DASA amended GM NTS.20(a)5 (renumbered as GM NTS.20(a)6) as follows to provide more context:</p> <p><i>The training exception allowed for in DASR NTS.20(a)6 should only be applied either:</i></p> <ul style="list-style-type: none"> <li><i>i. in cases where the AM, Sponsor or UAS Operator adopts a cyclical training schedule where a subset of the course content is conducted at more frequent intervals with the intent that all content is covered over the extended period</i></li> <li><i>ii. in extenuating circumstances (ie after the AM, Sponsor or UAS Operator has conducted risk management IAW DASR SMS, and the operational need to apply an exception is warranted when weighed against the residual risk). Extenuating circumstances:</i> <ul style="list-style-type: none"> <li><i>(a) could include personnel who are graduates of an exemplar CAA or MAA equivalent NTS or HF training course</i></li> <li><i>(b) exclude the routine or casual application of exceptions.</i></li> </ul> </li> </ul>
37	AMC NTS.20(a)6b.iv	HQAC		<p>Is there a DFSB <i>Aviation Non-Technical Skills: Essentials for Trainers</i> guidebook?</p> <p>Delete the second sentence that describes the guidebook.</p>	<p>Same two comments as for AMC NTS.20(a)3a(iii):</p> <ul style="list-style-type: none"> <li>- Only <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> is available on the DFSB website.</li> <li>- This is more like GM content than AMC, and is unnecessary.</li> </ul>	LSN 20 and 30 refer.
38	GM NTS.20(a)6a	HQAC		Is there a DFSB <i>Aviation Non-Technical Skills: Essentials for Trainers</i> guidebook?	Only <i>Aviation Non-Technical Skills: Fundamentals for Aviation Professionals</i> is available on the DFSB website.	LSN 20 refers.
39	AMC NTS.20(b)1a.ii	HQAC		<del>a Defence Instructor Course that delivers equivalent learning outcomes to the DFSB NTS Trainer Course</del>	A 'Defence Instructor Course' is a course of training and therefore satisfies the 'course of training' covered by AMC NTS.20(b)1a.iii.	DASA deleted AMC NTS.20(b)1a.ii and renumbered the sub-para accordingly.
40	AMC NTS.20(b)1a.ii and iii	HQAC	<p>GM NTS.10(b)4</p> <p>AMC NTS.10(b)4(i)</p> <p>AMC NTS.10(b)4(iv)</p>	Standardise the references to 'the DFSB Aviation NTS Trainer Course'.		DASA incorporated the suggestion and replaced all references with 'Aviation Non-Technical Skills (NTS) Trainer Course'.

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
41	AMC NTS.20(b)1a.ii and iii	HQAC		Who determines the equivalency to the DFSB Aviation NTS Trainer course?	Is this a role for whoever controls the LMP for the course of training, or for DFSB? If the former, is there a need for that assessment to be checked by DFSB?	MAOs, ANSPs and ABMOs should ensure training other than the DFSB NTS Trainer Course used to qualify NTST delivers equivalent learning outcomes. DFSB does not need to endorse/approve this training. DASA will confirm equivalence through its assurance activities.  DD FLTOPS to include in education for 2024. Contact DFSB to check the equivalence of an AM training course.
42	GM NTS.20(b)1b	HQAC		<i>The course also supports those individuals who facilitate awareness and knowledge-based training to ensure they have sufficient depth of knowledge in HF and NTS to respond with authority to related questions that may arise during training.</i>  Why is this stated when there is no requirement for NTSF to have specialised HF and NTS training? Suggest delete.		DASA incorporated the suggestions and deleted the third sentence of GM NTS.20(b)1b.
43	GM NTS.20(b)1d.iii	HQAC	GM NTS.10(c)1d	Delete. If required, but only suggested as a maximum, rephrase to: having an understanding of the operational context	Although this is only in GM, it would preclude use of Ryan Cooper (DFSB) or other Defence members, e.g. maintainers, air movements or OPSO, with the right attitude, behaviours, knowledge and skill from delivering the training to those covered by this regulation.  The rephrased suggestion is per that for third-party NTSF.	DASA amended GM NTS.20(b)1d.iii as follows:  <i>having an understanding of the operational context</i>
44	GM NTS.20(b)1e	HQAC		NTSF who deliver initial training need to have a Defence Instructor qualification whereas those who deliver continuation training do not.  What is the need for the Instructor qualification requirement?  Request that the requirement be removed, and therefore the para be deleted.	Also relates to comment wrt AMC NTS.20(a)1a on the use of third-party providers; and also the use of other skilled personnel such as Ryan Cooper.	LSN 1 and 31 refer.
45	GM NTS.20(b)1e	HQAC		If the HQAC request to remove the need for NTSF to have an Instructor qualification to deliver some of the NTS training is not accepted, this content is more akin to AMC than GM.		LSN 116 refers.
46	GM NTS.20(b)1e	HQAC		Depending on outcome of including NTSF for AMC NTS.20(a)3a(iv), i.e. conversion or endorsement knowledge training, the first sentence may require further amendment to reflect that.		DASA is retaining the requirement for NTSF who deliver initial knowledge-based NTS training should hold a Defence instructor qualification. Therefore, DASA did not amend the first sentence.
47	GM NTS.20(b)1e	HQAC	GM NTS.10(c)1e	Additionally, However, NTSF who deliver .....	Subpara d says they don't need instructional qualifications, therefore 'However' is the correct word to cover the case described where they do allegedly need an instructor qualification.	DASA incorporated the suggestion.

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48	GM NTS.20(b)1f.i	HQAC	GM NTS.10(c)1h	Suggest delete.	Similar to previous comment wrt being able to include non-Aircrew, non-ATC, non-ABM as NTSF, this list limits the types of Defence personnel that can deliver NTS training.  Also, because it is only in GM, it does not apply to third-party NTST (just AMC NTS.20(b)1), which is incongruous given that we presume you expect it to be applicable to Defence members.	DASA retained and amended GM NTS.20(b)1f.i. LSN 11, 49, 50 and 51 refer.
49	GM NTS.20(b)1f.i.(a)	HQAC	AMC NTS.10(c)1b.i	Aircrew Instructors ( <del>ie QFI, OFI, FCI, OI, MI, LI, CI, AWI, RPI</del> )	There is no need for the list in brackets, and it becomes proscriptive. Aircrew Instructor is defined in the DASP and they are determined by the MAO IAW their application of Aircrew.10.	DASA incorporated the suggestion.
50	GM NTS.20(b)1f.i.(b)	HQAC	AMC NTS.10(c)1b.i	Check Captain or Category Assessor <del>or Training Aircrew</del>	Use standard DASP terminology. If training aircrew existed, they would be a type of Aircrew Instructor.	DASA incorporated the suggestion.
51	GM NTS.20(b)1f.i.(c)	HQAC		Simulator instructors	They are a type of Aircrew Instructor.	DASA incorporated the suggestion.
52	GM NTS.20(b)1f.i.(d)	HQAC	AMC NTS.10(c)1b.i	<del>Flying Supervisors</del> Flying Supervision training course	Use terminology consistent with AMC ORO.30(a)3 a.iii(d)	DASA retained 'Flying Supervisor' which is the qualification awarded following completion of the Flying Supervisor Course and other pre-requisite requirements. Graduates of Flying Supervisor Course obtain the knowledge and attitudes necessary of a Flying Supervisor. However, they do not obtain workplace competence and there is no assessment on the course. Personnel are assessed for competence through Pilot Annual Categorisation Checks and other workplace assessments as detailed in relevant Occupation Specifications, before being awarded the qualification.
53	GM NTS.20(b)1f.i.(e)	HQAC	AMC NTS.10(c)1b.i	ATC or ABM Instructors		DASA incorporated the suggestion.
54	GM NTS.20(b)1f.i.(f)	HQAC		Suggest delete as would be unlikely to have this qual without being one of the list above.		DASA incorporated the suggestion.
55	GM NTS.20(b)1h	HQAC		This GM seems to be trying to do more than one job. It is in a Part discussing NTSF and NTST requirements, but it also addresses the training content.		DASA notes the response.
56	GM NTS.20(b)1h.i	HQAC		Depending on the response to the question posed at AMC NTS.20(a)1a for MAO, etc, to be allowed to present content equivalent to the DFSB Aviation NTS Foundation Course, this para may require amendment.	If the response to that question is negative, then it would be incongruous to be able to use a thirdparty provider that wasn't presenting the same foundational knowledge for standardisation across Defence, and amendment would be required to replace the reference to third-party's initial knowledge training content with reference instead to the DFSB Foundation course.	LSN 23 refers.
57	GM NTS.20(b)1h.iii	HQAC	GM NTS.10(c)1h.iii	..... the operational context; and NTST meet the training requirements of AMC NTS.20(b)1.	NTSF do not have any training requirements of AMC NTS.20(b)1, and therefore NTST should be specified.	DASA incorporated the suggestion.

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
58	NTS.20(b)1ii and iii	HQAC	NTS.10(c)1iii	Per GM NTS.20(b)1.d, 'NTSF are not required to hold instructional qualifications or undergo specialised HF and NTS training.' Why then do they require an LMP for training, and qualification processes?		DASA removed the words 'NTSF and' from NTS.20(b)1(ii). AMs, Sponsors and UAS Operators require a process to qualify an NTSF that ensures they meet the selection criteria and have the qualification recorded.
59	NTS.10(b)1	HQ AMG		The DASM requires Technicians and Airside staff (among others) to be NTS trained. Reference para only applies to Aircrew, UAS and ATCs.		LSN 18 refers.
60	NTS.10(b)4iii	HQ AMG		How is NTS meant to be integrated into the QMS?		LSN 21 refers.
61	GM NTS.20(b)1f	HQ AWC	AMC NTS.10(c)1b.i	Para F relates to trainers. By restricting who can be NTS trainers and facilitators to only aircrew musterings you are excluding a huge part of the workforce.	In the pre-ceeding paragraphs it talks more broadly about having an interest in NTS, being respected by peers and have suffieient knowledge. Why then exclude the maintenance workforce for eg. When I did my NTS trainer course at DFSB they had a range of members from aircrew, maintenance and even non tech related fields like catering. One of the best facilitators I saw was a CPL loadmaster who did not hold any of the proposed groups in para f but had interest, knowledge, passion and the ability to facilitate and talk well. Taking this further, AFTRSQN who are part of the AWC regularly fly UAS as part of the range requirements. With no aircrew amongst the SQN who hold the proposed skills then they would have no-one who could be trained to deliver NTS to their workforce. Instead then having to rely on another group who don't understand what they do to deliver NTS training. A lost opportunity to engage the broader workforce in NTS and a big departure from the current way of selecting people to be trained at DFSB.	NTST and NTSF are not restricted to only aircrew.  NTSF may be any member of the organisation. However, they should have the right attitude, behaviours, knowledge and skill (GM NTS.20(b)1d refers).  An NTST is only required to deliver skills-based NTS training and knowledge-based conversion or endorsement NTS training. An NTSF can deliver all other NTS training. Skills-based NTS training and knowledge-based conversion or endorsement NTS training must be integrated into the organisation's FMS (or equivalent). Therefore, it is appropriate that an NTSF hold an aviation instructional qualification within the organisation's FMS (or equivalent).  DASA has expanded the list of aviation instructional qualifications at AMC NTS.20(b)1b.i (LSN 49-53 refer).
62	GM NTS.20(b)1.f.i	HQ AWC	AMC NTS.10(c)1b.i	Request consideration for the addition of Flight Test Aircrew (FTA) as an aviation qualification prerequisite.	Interpretation if the proposed changes in the NPA were to be implemented, is that ARDU would have to source a QFI, OFI, etc, etc to be their NTS Trainer. This may be acceptable in practice, based on the type of people in ARDU generally, but it seems artificially limiting, considering the NTS gained in practicing FT.  Currently, ARDU has 5 NTST. However only 1 x OFI with the rest line Flight Test Aircrew that would not be able to qualify as an NTST if the propred list of aviation qualifications was passed as is.	DASA did not incorporate the suggestion.  The aviation qualifications listed at GM NTS.20(b)1f.i (renumbered as AMC NTS.20(b)1b.i) ensure significant experience and exposure to NTS training of those personnel who have attained one of the qualifications listed. Qualification as an FTA is not necessarily equivalent to qualification as an instructor or supervisor and would require AWC to demonstrate that all FTA would meet this same fundamental experience base. However, FTA who also hold one of the qualifications listed at GM NTS.20(b)1f.i may qualify as an NTST.
63	GM NTS.20(b)1	HQ AWC	GM NTS.10(c)1g	g. It is not the intention of this regulation that AMs deliver a specific NTS Trainer Course where such specialised HF and NTS training has already been achieved through extant aviation instructor, <b>flight test</b> , and flying supervisor courses.		DASA incorporated the suggestion.

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
64	NTS.20	HQ SRG		General comment - HQSRG will be required to establish a training management plan.	This will require a significant body of work and time - needs to be in place by Feb 2025 (12 month transition period). Consideration will need to be given to lateral/cross-service transfer eg Initial Knowledge Based training is not currently conducted at conversion/endorsement training establishments, so either an exemption or delivery of this will be required.	DASA notes the response.
65	NTS.20.(a)1	HQ SRG		Initial Knowledge Based Training - initial based training occurs at ACMC (AMTS) and therefore no impost to FEG/Unit level	Assessed as no impact - understanding is that this is delivered by Defence Instructors at ACMC/AMTS	DASA notes the response.
66	NTS.20(a)3 AMC and GM NTS.20(a)3	HQ SRG		Knowledge based training required to be conducted at conversion/endorsement training - SACTU currently delivers NTS continuation training contextualised to their type of operation and SATC has the ability to do the same. (The associated LMPs are generic in meeting the NTS outcomes.)	SATC may be required to deliver NTS knowledge based training to meet the intent of the conversion/endorsed training establishment. Currently for ATC, the endorsed training is conducted across 12 Flights. ABM endorsed training is also conducted at 3CRU, 114MCRU and 1RSU ie annual proficiency/upgrade qualifications. It is recommended that the wording within SRG OIP/DASA Reg stipulates that only those establishments that conduct initial employment training courses (ie SACTU, SATC, 2SQN), be required to conduct knowledge based training with qualified NTS Trainers (as these establishments have sufficient qualified NTS Trainers), vice establishments that conduct other endorsed training such as other annual proficiency/upgrade qualifications. There are only enough qualified NTS Trainers at establishments that conduct endorsed training such as annual proficiency/upgrade qualifications (ie 3CRU, ATC Flights, 114MCRU) to deliver knowledge based training as a currency requirement (ie every 2 years), and not as part of each endorsed training session or assessment session. It is fair to say that members conducting annual proficiency assessments or upgrades, as part of their endorsed training, should already have the knowledge based training from their IET for their specific platform/system they are trained on. eg if SACTU and SATC deliver knowledge based training for all ABM/ATC by qualified NTS Trainers, then do members also need knowledge based training <b>by a qualified NTST</b> when undergoing annual proficiency assessments/upgrades (endorsement training)? Or can the endorsed training for these annual proficiency assessments/upgrades be exempt from being conducted by an NTST?	DASA notes the response.

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67	NTS.20(a)3 AMC and GM NTS.20(a)3	HQ SRG		Will the LMP be a requirement for each training establishment to develop, or will a generic LMP be provided by DFSB?	Assessed as minimal impact as a generic LO could be embedded within the LMP to cover the NTS skillsets	Knowledge-based conversion or endorsement NTS training and skills-based NTS training should reference the applicable LMP (where implemented). The applicable LMP should be: <ul style="list-style-type: none"> <li>a. developed by the MAO, ANSP or ABMO</li> <li>b. specific to the organisation</li> <li>c. either: <ul style="list-style-type: none"> <li>i. a standalone plan, or</li> <li>ii. an extant FMS (or equivalent) LMP with NTS training elements embedded in it.</li> </ul> </li> </ul>
68	NTS.20(a)3 AMC and GM NTS.20(a)3	HQ SRG		NTST requires defence instructor qualification. Is there a requirement for all members posted into these training establishments to hold the defence instructor qualification or just enough members to deliver the training for each course?		There is no requirement for members posted in to training establishments to hold a Defence instructor qualification. MAOs, ANSPs and ABMOs should determine specific NTST and NTSF requirements with reference to the Learning Management Plan for their NTS training.  DASA notes, and will include commentary in the RIS on the resource impost in training NTST.
69	AMC NTS.20(b)1b	HQ SRG		It is unknown if all Defence Instructor courses have NTS equivalent content embedded within. If they do not, then this will limit the number of qualified NTS Trainers, unless they are able to complete DFSB NTST course or an equivalent course that delivers the same LO of the DFSB NTS Trainer Cse.	Will DFSB be able to deliver NTS Training to Defence Instructors from each training establishment to meet the current intent (upon investigation there are only 270 qualified and current NTSTs within the ADF). Will training establishments be able to deliver the DFSB NTST course or be able to establish their own equivalent course to ease the burden and meet the NTST requirements?	MAO, ANSP and ABMO may meet NTST training requirements by ensuring that personnel in scope complete one of the following courses: <ul style="list-style-type: none"> <li>i. the Aviation Non-Technical Skills (NTS) Trainer Course conducted by DFSB</li> <li>ii. a course of training that delivers equivalent learning outcomes to the DFSB Aviation Non-Technical Skills (NTS) Trainer Course.</li> </ul>



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70	NTS.20(a)6	HQ SRG	NTS.10(b)3i	Skills-based training integrated into organisations FMS. It is alluded that the integration of skills based training is not considered outside the FMS eg ATC/ABM	The scope in NTS.20 NTS Training (a)6. states skill-based training and assessment is integrated into the organisations FMS which typically ATC and ABM do not have. With this said however, the definition of FMS is <i>A system of processes and procedures within a flying organisation centred on aircraft types or AvSS which establishes the management practices, operational rules, and operator training and qualification requirements that support operational airworthiness.</i> Based on this, ATC and ABM organisations will need to integrate skills based training within their management system. The reg states that NTS is to be delivered by a NTST and all assessments (eg upgrde/currency assessments) will need to touch on NTS skillsets such as communication, situational awareness etc. This will require updating/creating LMPs and sufficient qualified NTST as defined by the AM. See LSN 3 for similiar issue regarding a qualified NTS Trainer required to conduct assessments. Can skills based assessments that are not initial employment training assessments be exempt from needing to be assessed by a qualified NTST? ie an annual currency assessment or upgrade assessment be exempt from requiring an NTST to conduct the assessment.	Skills-based NTS training is intended to target relevant and emerging NTS performance issues, and to contextualise NTS training for the aviation system and the organisation's roles and tasks. Skills-based NTS training and knowledge-based conversion or endorsement NTS training must also be integrated into the organisation's FMS. Therefore, it is appropriate that initial skillsbased NTS training should be delivered through instruction by someone with an aviation instructional qualification relevant to the organisation's FMS (or equivalent).  DASA added the words '(or equivalent)' at all references to FMS for clarity. LSN 9 refers.
71	NTS.20(a)6	HQ SRG		Same as above regarding NTST - all personnel who conduct training and assessment events are to be qualified as defined in the reg.	Integration into the FMS and assessment is required. All LMPs will need to include NTS skillsets ie communication, situational awareness etc. See LSN 3 for similiar issue regarding a qualified NTS Trainer required to conduct assessments. Can skills based assessments that are not initial employment training assessments be exempt from needing to be assessed by a qualified NTST? ie an annual currency assessment or upgrade assessment be exempt from requiring an NTST to conduct the assessment.	LSN 70 refers.
72	GM NTS.20(b)1f.i(a)	HQ AFTG		Do you mean ie or eg?	Latin <i>id est</i> means that is, which is definitive. Is the list complete and absolute? Use eg if it is sample and not all of the viable qualifications.	DASA removed the list at GM NTS.20(b)1f.a. LSN 49 refers.
73	GM NTS.20(b)1f.i(b)	HQ AFTG		Lowercase check or training	Check or training are not DASP terms nor proper nouns and, therefore, are common nouns.	DASA amended GM NTS.20(b)1f.i(b) as per LSN 50.
74	GM NTS.20(b)1f.i(e)	HQ AFTG	AMC NTS.10(c)1b.i	Lowercase instructors	ATC instructors is not a DASP term nor a proper noun and, therefore, a common noun.	DASA incorporated the suggestion.
75	GM NTS.20(b)1f.i(f)	HQ AFTG	AMC NTS.10(c)1b.i	Lowercase airborne instructional technique	Not a DASP term nor a proper noun nor Defence term: it isn't in the ADG.	DASA removed AIT from the list at GM NTS.20(b)1f.a. LSN 54 refers.

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76	GM NTS.20(b)1g	HQ AFTG	GM NTS.10(c)1c	Replace 'NTS Trainer Course' with 'NTS Trainer course'.	NTS Trainer course is not a DASP term nor a proper noun.	LSN 108 refers.
77	NTS.20(b)1(iii)	HQ AFTG	AMC NTS.10(c)1b	Lowercase qualification	DASP term Qualification relates to qualifying an FSTD, not the qualification in this context. Common noun, hence lowercase 'qualification'.	DASA incorporated the suggestion.
78	NTS.10.(a)	HQ ACG		Suggested change: The MAO, Sponsor, persons authorising and operators of an aircraft, UAS or ANSP ....		DASA did not incorporate the suggestion. LSN 14 and 15 refer.
79	NTS.20(a)1i	HQ ACG	NTS.10(b)4	Suggested change: (i) conducting Flight operations during initial aviation operations employment	The reg requires that an AM must establish an NTS training program for knowledge based training prior to conducting flight operations. Practically, initial knowledge based training (i.e. NTS Foundation) should only be delivered by initial aviation operations employment training organisations (e.g. AFTG) and shouldn't apply to all AMs. Including initial aviation operations employment provides context, similar to that used in NTS.20.(a).3.(i).	DASA amended the wording at NTS.20(a) as follows:  <i>The AM, Sponsor and UAS Operator must ensure that personnel complete the following NTS training:</i>  Additionally, DASA amended the wording of the last sentence at GM NTS.20(a) as follows:  <b>(Defence)</b> <i>This regulation requires AMs, Sponsors and UAS Operators to ensure personnel are provided with NTS knowledge, skills and awareness training to ensure Suitability For Flight.</i>
80	AMC NTS.20(a)1	HQ ACG	NTS.10(b)4	Suggested change: The AM of initial aviation operations employment training organisations may meet initial knowledgebased NTS training requirements by ensuring that personnel complete the Aviation NTS Foundation Course	GM NTS.20.(a).1 states that Aviation NTS Foundation course is "designed to be incorporated into the curriculums of initial aviation operations employment training and other aviation-related supplemental training courses."	DASA amended NTS.20(a) (LSN 79 refers) and retained the current wording for the accompanying AMC.
81	NTS.20(b)1ii	HQ ACG	NTS.10(c)1iii	Suggested change: LMP to train-NTSF and NTST	GM NTS.20(b)1.d states that NTSFs are "not required to hold instructional qualifications or undergo specialised HF and NTS training. NTSF may be any member of the organisation. However, they should have the right attitude, behaviours, knowledge and skill including:  i. an interest in HF and NTS ii. possessing suitable communication and presentation skills iii. having sufficient operational experience to facilitate conversations around operational issues (ie Proficient Aircrew or equivalent) iv. being someone respected by the cohort being trained.  Based on this GM, an LMP isn't required for a NTSF.  If DASA disagree, it is suggested that DFSB create a common NTSF LMP or update the existing DFSB NTST LMP to include NTSF.	LSN 58 refers.

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82	AMC NTS.20(a)6a.I	HQ ACG	AMC NTS.10(b)4(iv).a	Suggested change: all FMS training and assessment events	It is considered impractical to include skills based NTS training in all FMS training and assessment events.	DASA incorporated the suggestion.
83	AMC NTS.20(a)6b.ii	HQ ACG	AMC NTS.10(b)4(iv).b	Suggested change: Reference an LMP (if applicable)	AMC NTS.20.(a).6.b.i. states that NTS skills-based training needs to be defined in OIP. Depending on FEG implementation, the skills-based training may be integrated into other training aspects, e.g. Category upgrade program, which may not have a LMP.	DASA amended the wording of AMC NTS.20(a)6b.ii as follows:  <i>ii. reference the applicable LMP (if implemented)</i>  <b>Rationale:</b> One of the outputs of SADL learning design is an LMP. However, delegated authorities for learning design can select which tasks are required under each SADL phase, including the need for an LMP. Delegated authorities should approach learning with the same considerations as with other planning (ie as required by the circumstances and using a risk-based approach).  Therefore, a delegated authority may determine that an LMP is not required for NTS training. Where an LMP is implemented for NTS training, it should be referenced.
84	Amended GR.20(b) GM NTS.10 Purpose NTS.20(a)1.ii and iii NTS.20(a)2	HQ AFTG	NTS.10(b)4	Defence Aviation	Is this the DASP Glossary term:  <b>Defence Aviation *</b> The design, construction, maintenance and operation of any aircraft owned, leased, hired or chartered by Defence; any aircraft operated exclusively for or on behalf of Defence; any aircraft for which CASA has placed statutory airworthiness responsibilities on Defence; and any AvSS.?  Should be capitalised Defence Aviation if so.	DASA incorporated the suggestion.

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
85	NTS.10(a)	HQ AFTG		Replace 'The MAO, Sponsor, persons authorising and operators of a UAS or ANSP' with 'The Accountable Manager (AM)'.	<p>As per pre-NPA review, recommend using: The Accountable Manager (AM) must ...</p> <p>AM is used in MAO, ANSP and ACD organisations. Sponsor is used in NDR and persons authorisation and operators in UAS. All of the listed responsible and accountable persons fit within the DASP Glossary <b>Accountable Manager (AM)</b> * Person designated by the Approved Organisation, and identified in the Organisation Exposition or Compliance Statement, who is accountable for maintaining safety standards required by relevant DASR and any additional standards specified. Typically, this is a key figure who has influence within the organisation and the ability to make appropriate resource decisions.</p> <p>The scope of what is an AM belongs in the GM for NTS.10(a). However, if this is not the case, then DASR NTS.10(b), which uses 'AM', must be changed so as not to hijack an already defined term for another purpose.</p>	DASA amended the wording as per LSN 14 and retained the scope of which AMs DASR NTS applies to in the Part.
86	GM NTS.10(a)b	HQ AFTG	GM NTS.10(a)c	Remove 'more safely'.	Is NTS about 'more safety' or does NTS do the 'more effectively' leading to 'more safely' outcomes?	DASA incorporated the suggestion at (renumbered) GM NTS.10(a)c.
87	NTS.10(b)	HQ AFTG		<p>Like DASR SMS.10(a), NTS.10(b) should state:</p> <p><i>DASR NTS only applies to organisations where the DASR NTS is listed as a requirement from the relevant section of the DASR.</i></p> <p>and have cross-citing to DASR NTS from DASR Aircrew, DASR UAS.20 and DASR UAS.30(b), DASR ANSP, DASR 139, DASR 66.</p>	The DASM Part 4, Annex 1A, lists many more personnel to which NTS applies than those listed in NTS.10(b).	<p>DASA has not incorporated the suggestion.</p> <p>The revised GR.20 defines the scope and applicability of DASR NTS to include personnel and organisations involved in Defence Aviation operations. NTS.10(b) further refines the scope and applicability to only include:</p> <ol style="list-style-type: none"> <li>Aircrew</li> <li>Crew who operate UAS IAW DASR UAS 20(a) Certified Category UAS or DASR UAS.30(b) Specific Type A Category UAS where DASA has identified through the OpSpec or UASOP, a need to comply with DASR NTS</li> <li>Aircraft Controllers.</li> </ol> <p>DASR NTS may apply to other organisations where DASR NTS is listed as a requirement in the relevant section of the DASR. However, it is not convention to include such a statement at each DASR Part.</p>

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88	NTS.10(b)	HQ AFTG		Define AM.	Stating '(the Accountable Manager (AM))' has been removed from NTS.10(a) as was in the pre-NPA preview that, if correct, the use of 'AM' in NTS.10(b) and subsequent NTS implementing regulations is not defined. AM can be used correctly but the linkage is not obvious and would be better explained than implied. See comment to NTS.10(a) and the scope of what is an AM belongs in the GM for NTS.10(a).	LSN 14 refers.
89	NTS.10(b)1	HQ AFTG	NTS.10(b)1	Replace 'apply to' with 'include'.	Applicability is used in GM and GR to declare the application of the regulation at the macro-level. This is talking about the scope of a specific element of the regulation and using 'include' in NTS.10(b)1 is also then consistent with use of 'include' in NTS.10(b)2. Note, however, separate comment about making DADR NTS applicability included in the relevant DADR, as is done for DADR SMS, that would negate this comment.	DASA incorporated the suggestion amending the wording to <i>'include within its scope.'</i>
90	NTS.10(b)1.ii	HQ AFTG	NTS.10(b)1(ii)	Replace 'UAS.30(a)1' with 'UAS.30(b)'.	UAS.30(a)1 defines the Specific Type categories but the criteria for operating a Specific Type A category UAS is in UAS.30(b). Note, however, separate comment about making DADR NTS applicability included in the relevant DADR, as is done for DADR SMS, that would modify this comment.	DASA incorporated the suggestion.
91	NTS.10(b)1.ii	HQ AFTG	NTS.10(b)1(ii)	Reword '... where the Authority has identified through the OPSPEC or UASOP, a need to comply with DADR NTS' to read '... where the DASA has identified a need to comply with DADR NTS through the OpSpec or UASOP'	DASA is replacing 'the Authority' with 'DASA' in prior NPAs and DASA is understood to be the standardised term going forward. 'Stating '... where the DASA has identified a need to comply with DADR NTS through the OpSpec or UASOP' is easier to read. Note, however, separate comment about making DADR NTS applicability included in the relevant DADR, as is done for DADR SMS, that would modify this comment.	DASA incorporated the suggestion.
92	NTS.10(b)1.ii	HQ AFTG	NTS.10(b)1(ii)	Replace OPSPEC with OpSpec.	DASP Glossary is 'OpSpec'. Note, however, separate comment about making DADR NTS applicability included in the relevant DADR, as is done for DADR SMS, that would modify this comment.	DASA incorporated the suggestion.

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93	NTS.10(b)2	HQ AFTG		Replace at with in	<p>Things are in cross-references, not at them. At addresses, yes, but in references and supplementary documents.</p> <p>Vide the Defence documents website, <a href="http://intranetdefencegov.au/home/documents/hom.htm">http://intranetdefencegov.au/home/documents/hom.htm</a>, the Australian Government Style Manual, <a href="https://www.stylemanualgov.au/">https://www.stylemanualgov.au/</a>, is the primary reference for writing conventions and styles for Defence manuals, of which the DASPMAN is one. The style manual is silent on this topic. However, the Australian Defence Force Writing Manual, <a href="http://intranetdefencegov.au/home/documents/data/DEFPUBS/DEPTMAN/ADFWritingManual/ADFWritingManual.pdf">http://intranetdefencegov.au/home/documents/data/DEFPUBS/DEPTMAN/ADFWritingManual/ADFWritingManual.pdf</a>, is the authorised secondary reference for Defence manuals, and contains explicit conventions to use 'in' in this context.</p>	DASA deleted NTS.10(b)2 in toto and renumbered the sub-para accordingly.
94	GM NTS.10(b)3 AMC NTS.20(a)3a.iii AMC NTS.20(a)6b.iv	HQ AFTG	GM NTS.10(b)4	Lowercase commanders	Commander is not a DASP term and commander is lowercase in all Defence contexts except when talking about the rank Commander (RAN) or the level in the organisation Command, short for Air Command in the case of Air Force and Environment Command in the case of the DASP.	DASA replaced 'commanders and managers' with 'AMs, Sponsors and UAS Operators'.
95	GM NTS.10(b)4(i) AMC NTS.20(a)6b.iii GM NTS.20(a)6b	HQ AFTG	GM NTS.10(b)3(i) GM NTS.10(b)4(iii)(a) AMC NTS.10(b)4(iv) GM NTS.10(b)4(iv)	Aviation System	DASP term capitalise Aviation System	DASA incorporated the suggestion.
96	GM NTS.20a	HQ AFTG	NTS.10(b)4	Replace aircraft with Defence Aviation	NTS is not just about aircraft; Defence Aviation is a DASP term (as is Aircraft).	DASA incorporated the suggestion.
97	AMC NTS.20(a)1a GM NTS.20(a)1a (two instances)	HQ AFTG	AMC NTS.10(b)4(i)	Replace 'Aviation NTS Foundation Course' with 'Aviation Non-Technical Skills (NTS) Foundation Course'	<i>Aviation Non-Technical Skills (NTS) Foundation Course</i> is the actual course name.	DASA incorporated the suggestion.
98	AMC NTS.20(a)1a.iii	HQ AFTG	AMC NTS.10(b)4(i)a(iii)	Reword: <i>Defence-recognised instructor qualification.</i>	The instructor qualification does not need to have been delivered by Defence, it only needs to be recognised by Defence.	DASA incorporated the suggestion.
99	NTS 20(a)1(i)	HQ AFTG	NTS.10(b)4i	Flight Operations	<p>DASP term <b>Operation</b> *</p> <p>The process and action of operating aircraft following the initial and continual acceptance of the design, construction and maintenance processes, acts and actions by the operational chain of command in relation to the flight of such aircraft in the operational environment. directly relates to flight. Operations in NTS 20(a)1(ii) and (iii) is correctly lowercase.</p>	DASA incorporated the suggestion.

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100	NTS 20(a)1 (ii) and (iii) NTS 20(a)2	HQ AFTG	NTS.10(b)4	Defence Aviation	DASP term <b>Defence Aviation</b> * The design, construction, maintenance and operation of any aircraft owned, leased, hired or chartered by Defence; any aircraft operated exclusively for or on behalf of Defence; any aircraft for which CASA has placed statutory airworthiness responsibilities on Defence; and any AvSS.	DASA incorporated the suggestion.
101	GM NTS.20(a)2a.i	HQ AFTG		Replace CAA with NAA	CAA is not a DASP term and CAA was removed from NTS.10(b)3 in reissuing the NPA in Rev 1. I note CAA used in NPA 2022-018 - DASR 'Defence Navigation Approvals' DASR SPA.50 that is also called out. Unless DASA is intending to change all references of 'NAA' to 'CAA', the use of CAA in this and NPA 2022-018 are incorrect. Further, why is DASA using CAA in place of NAA in recent NPAs and, if this is the beginning of a change, all of DASPMAN going forward? ICAO does not define nor refer to CAA or civil authority but does refer to the national authority, that is implicitly the national aviation authority (i.e. NAA), in Annex 6 (operations) and Annex 8 (airworthiness), and EASA defines and refers to NAA as does CASA, hence the rationale for DASA using 'CAA' is not immediately apparent.	DASA has not replaced CAA with NAA.  DASA has begun using the term 'Civil Aviation Authority' (CAA) vice 'National Aviation[Airworthiness] Authority' (NAA) in order to promote clarity and consistency. The change will be promulgated throughout the DASP Manual in Feb 24 and formally communicated to the regulated community at that time. ICAO defines and uses the term Civil Aviation Authority (eg see ICAO Doc 8400 ICAO Abbreviations and Codes, ICAO Doc 9734 Safety Oversight Manual Part A para 1.1.2) in the same sense that DASA now uses the term. NAA has its genesis in the EASA framework as a means to refer to the CAAs of the member states as opposed to EASA itself. The term does not capture EASA, being a supranational agency, and is not immediately identifiable as referring to a civil or military organisation.
102	AMC NTS.20(a)3a.iii	HQ AFTG	GM NTS.10(b)2 GM NTS.10(b)4 AMC NTS.10(b)4(iv) GM NTS.10(b)4(iv)	Lowercase guidebook	Common noun when used in a pronoun context. Lowercase.	DASA incorporated the suggestion.
103	NTS.20(a)3(ii)	HQ AFTG	NTS.10(b)4iii	Delete the comma in Aircraft Controller endorsement training, or equivalent	Incorrect use of a comma.	DASA incorporated the suggestion.
104	AMC NTS.20(a)4a	HQ AFTG	AMC NTS.10(b)4(v)	Is <i>Aviation NTS Continuation Course</i> the name of a specific course?  The DFSB website <a href="http://dmet/raaf/AirForce/DFSBRIR/Human%20Factors/Pages/NTS%20Continuation%20Training.aspx">http://dmet/raaf/AirForce/DFSBRIR/Human%20Factors/Pages/NTS%20Continuation%20Training.aspx</a> relates to <i>Aviation Non-Technical Skills (NTS) Continuation Training</i> but not a 'course'. Recommend:  <i>The AM may meet knowledge-based NTS continuation training requirements by ensuring that personnel complete Aviation NTS continuation training conducted by either:</i>	Not the specific name of a thing is a common noun and lowercase.	DASA replaced <i>Aviation NTS Continuation Course</i> with 'DFSB developed NTS continuation training'. LSN 33 refers.

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
105	GM NTS.20(a)6b	HQ AFTG	GM NTS.10(b)4(iv)b	Delete the comma following MAOs in: <i>For example, one Aircraft Type could be operated by multiple MAOs, but still necessitate differing NTS management solutions due to different CRE.</i>	Incorrect use of a comma.	DASA incorporated the suggestion.
106	GM NTS.20(a)6b	HQ AFTG	GM NTS.10(b)4(iv)b	In 'Therefore, common NTS management solutions are unlikely to minimise all risks SFARP.' suggest replacing 'are unlikely to' with: 'may not'	Stating 'are unlikely' is presumptive and, I suggest, is not appropriate for DASA to proffer such guidance.	DASA incorporated the suggestion.
107	GM NTS.20(a)7b	HQ AFTG	GM NTS.10(b)4(iv)b GM NTS.10(b)4(iii)(b)	Aviation Safety	DASP term <b>Aviation Safety</b> * A state in which risks to personnel arising from aircraft operations are eliminated or otherwise minimised so far as is reasonably practicable through a continuing process of hazard identification and safety risk management.	DASA incorporated the suggestion.
108	AMC NTS.20(b)1a.i GM NTS.20(b)1b	HQ AFTG	AMC NTS.10(c)1a	Replace 'Aviation NTS Trainer Course' with 'Aviation Non-Technical Skills (NTS) Trainer Course'.	<i>Aviation Non-Technical Skills (NTS) Trainer Course</i> is the actual course name.	DASA incorporated the suggestion.
109	AMC NTS.20(b)1a.ii	HQ AFTG	GM NTS.10(c)1e	Lowercase instructor course	Instructor course is not a DASP term nor a proper noun.	DASA incorporated the suggestion.
110	AMC NTS.20(b)1a.ii and iii	HQ AFTG	AMC NTS.10(c)1a	Replace 'NTS Trainer Course' with 'Aviation Non-Technical Skills (NTS) Trainer Course'.	<i>Aviation Non-Technical Skills (NTS) Trainer Course</i> is the actual course name.	DASA incorporated the suggestion.
111	GM NTS.20(b)1d	HQ AFTG	GM NTS.10(c)1d	Reword 'NTSF are not required to hold instructional qualifications or undergo specialised HF and NTS training.' to read:  <i>NTSF are not required to undergo specialised HF and NTS training nor are NTSF required to hold an instructor qualification.</i>	The principal purpose of the guidance is about NTS, which should be mentioned first. The specialist 'HF and NTS training' is a very distinct qualification from 'instructor qualification' and these need to be presented distinctly and clearly in the GM.	DASA incorporated the suggestion.
112	GM NTS.20(b)1d	HQ AFTG	GM NTS.10(c)1d	Replace 'they' with 'NTSF' in the final sentence.	Precision.	DASA incorporated the suggestion.
113	GM NTS.20(b)1d.iii	HQ AFTG	GM NTS.10(c)1d	Lowercase proficient	Not a DASP term nor a proper noun.	DASA amended GM NTS.20(b)1d.iii removing the reference to Proficient aircrew. LSN 43 refers.
114	GM NTS.20(b)1e	HQ AFTG	GM NTS.10(c)1d	Delete 'Additionally, '.	'Additionally' is unneeded and there is no direct object to which this requirement is additional.	DASA incorporated the suggestion.
115	GM NTS.20(b)1e	HQ AFTG	NTS.10(b)4i	What does 'initial knowledge-based NTS training' mean? DADR NTS describes two training requirements:  * foundation, <i>Aviation Non-Technical Skills (NTS) Foundation Course</i> * continuation, <i>Aviation Non-Technical Skills (NTS) Continuation Training</i>  Which of those is 'initial knowledge-based NTS training'?	The user needs to know clearly and precisely what the Authority means and the as written GM is neither clear nor precise.	DASA retained 'initial knowledge-based NTS training'.  Initial knowledge-based NTS training is detailed at NTS.20(a)1 and its accompanying AMC and GM. Initial knowledge-based NTS training is the training conducted prior to either:  a. conducting Flight Operations  b. controlling Defence Aviation operations under an ANSP (iii) managing Defence Aviation operations under an ABMO.  Note: LSN 23 amended the wording at NTS.20(a)1 to clarify that NTS.20(a)1 is 'initial knowledge-based NTS training'.



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116	GM NTS.20(b)1e	HQ AFTG	GM NTS.10(c)1e	<p>Merge GM NTS.20(b)1e as GM NTS.20(b)1d.v. and reword, vis:</p> <p><i>v. NTSF who deliver initial knowledge-based NTS training should hold a Defence-recognised instructor qualification. (This does not need to be Aircrew Instructor qualification. Personnel who have completed a Defence-recognised instructors course or a specialist instructor course [eg driver or weapons instructor] may hold suitable instructor skills.)</i></p>	<p>The instructor attribute for an NTSF when delivering 'initial knowledge-based NTS training' (whatever that means) directly relates to the stem sentence: 'However, [NTSF] should have the right attitude, behaviours, knowledge and skill including:' in GM NTS.20(b)1d.</p> <p>Instructors course is not a DASP term and 'ADF instructors course' is not a proper noun. The instructor qualification does not need to be an ADF qualification but does need to be Defence-recognised instructors course (eg TAE401xx - <i>Certificate IV in Training and Assessment</i>).</p> <p>Is there a course named <i>Driver or Shooter Instructor</i>? Whilst there may be a Defence Driver Instructor Course and a Shooter (or more likely Weapons) Instructor Course, conflating the names makes them descriptive, adjectival phrases 'driver or shooter instructor' not proper noun 'Driver or Shooter Instructor'.</p> <p>That is (ie) is definitive: 'driver or shooter instructor' is an example (eg) not a definition.</p> <p>'Requirement' should not be used because this is a recommended (should) not a mandatory (must) skill.</p> <p>Note the separate inquiry about the meaning of 'initial knowledge-based NTS training'.</p>	<p>DASA incorporated the suggestion and amended the wording as follows:</p> <p><i>The Defence-recognised instructor qualification for NTSF who deliver initial knowledge-based NTS training does not need to be an aviation instructor qualification. Personnel who have completed a Defence-recognised instructors course or a specialist instructor course (eg Driver Instructor) may hold suitable instructor skills.</i></p>

117	NTS.20(a)3	DFSB/DASA FLTOPS	NTS.10(b)4iii AMC	<p>Recommend removing the requirement for knowledge-based conversion NTS training and extending the NTS 'awareness' training requirement to specially call out the need to conduct awareness training in conversion/endorsement training. The training can be conducted under the guidance of a facilitator.</p> <p>Additionally, recommend deleting NTS.20(a)1iii in toto and allowing an NTS Facilitator (NTSF) who holds a Defence-recognised instructor qualification to deliver by exception.</p>	<p>Justification is as follows:</p> <ul style="list-style-type: none"> <li>• There seems to be some confusion in the use of terminology. As per my previous email, knowledge based training must be standardised and assessed. Defence aviation has not previously conducted knowledge-based training. It is a new and necessary requirement to ensure training transfer.</li> <li>• The continuation training that has been conducted across Defence aviation for decades is best described as 'awareness' training (and not knowledge-based training). It is of equal importance, but rather than theory and assessment, it focuses on facilitated discussions to reinforce NTS attitudes and behaviours within a specific operating context. This training should continue. But it is less formal and does not require the same level of standardisation. It can also be delivered by a NTS Facilitator (or under there guidance).</li> <li>• The requirement for NTS Trainers to themselves be trained to a standard to develop knowledgebased NTS content is problematic, and likely equivalent to a postgraduate qualification. To do so is neither necessary nor practical (and outside the capacity of DFSB). The NTS trainer proficiency is best focused on preparing individuals for conducting NTS skills-based training.</li> <li>• IAW the definition and supplementary policy in DASR NTS, a NTSF is not qualified to deliver NTS Foundation learning because NTSFs enable learning by guiding participants to build on their knowledge and because NTSFs are not required to hold formal HF or NTS qualifications. NTS Foundation learners have no knowledge upon which to build and certainly require a qualified HF/NTS educator.</li> </ul>	<p>DASA:</p> <ol style="list-style-type: none"> <li>removed NTS.20(a)3 (renumbering NTS.20(a) accordingly) and AMC NTS.20(a)3 in toto</li> <li>amended NTS.20(a)6 (renumbered as NTS.20(a)3) as follows: <ul style="list-style-type: none"> <li><i>bridging training conducted:</i> <ol style="list-style-type: none"> <li>during Aircrew or Crew conversion training or Aircraft Controller endorsement training or equivalent [GM] [AMC]</li> <li>periodically [GM] [AMC]</li> </ol> </li> </ul> </li> <li>added AMC NTS.20(a)3i(a) as follows: <ul style="list-style-type: none"> <li><i>The AM, Sponsor or UAS Operator may meet conversion or endorsement NTS bridging training requirements by ensuring that personnel delivering the training are either:</i> <ol style="list-style-type: none"> <li>an NTST</li> <li>or if risk managed IAW DASR SMS, by an NTSF who holds a Defence-recognised instructor qualification.</li> </ol> </li> </ul> </li> <li>Amended and retitled GM NTS.20(a)3i(a) as follows: <ul style="list-style-type: none"> <li><i>AMs, Sponsors and UAS Operators of organisations providing conversion or endorsement training should provide NTS bridging training that contextualises NTS theories and concepts taught during initial knowledge-based NTS training, to the task, applicable processes and Aviation System in use. Such training should incorporate case studies and examples from the associated organisation and exemplar operators with comparable CRE, to contextualise the theory taught during initial knowledge-based NTS training and support the transition from knowledge to skills-based performance.</i></li> </ul> </li> <li>retitled GM NTS.20(a)3 as 'GM NTS.20(a)3ii - Periodic NTS bridging training'</li> <li>elevated GM NTS.20(b)1fi and GM NTS.20(b)1f.iii to AMC (retitled as AMC NTS.20(b)1b) and replaced 'should' throughout this para with 'must'</li> <li>amended NTS.20(a)1a.iii as follows:</li> </ol>
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LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Post NPA Regulation Reference: (renumbered Regulation)	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
						<i>or if risk managed IAW DASR SMS, by an NTS Facilitator (NTSF) who holds a Defence-recognised instructor qualification.</i>
118	NTS.10	DG DASA	GR.20(b) NTS.10(b)4 NTS.10(c)	The proposed DASR does not appear cohesive across NTS 10a and b, and I cannot see value in extending scope beyond MAO, ANSP and ABNOps. I am reluctant to support NDRA sponsors and UAS operators as a collective	Constrain to ABM, ANSP, MAO.	<p>DASA:</p> <p>b. constrained the scope as suggested by:</p> <p>i. adding the following at GR.20(b):</p> <p style="padding-left: 40px;"><i>Paragraph (a) is not applicable to Uncrewed Aircraft Systems except as required by DASR UAS Uncrewed Aircraft Systems.</i></p> <p>ii. Replacing the terms 'MAO-AM, Sponsor, UAS Operators, ANSP-AM and ABMO-AM' and 'AM, Sponsor and UAS Operator' (introduced at LSN 14) throughout with 'MAOs, ANSPs and ABMOs'</p> <p>iii. deleting the sentence 'The term 'UAS Operators' refers to the accountable person in respect of UAS operations within a Defence unit or organisation, not the Remote Pilot' from GM NTS.10(a).</p> <p>c. improved cohesion through the changes at a, and by relocating the contents of NTS.20 to NTS.10(b)4 and NTS.10(c).</p>