

European Aviation Safety Agency

COMMENT RESPONSE DOCUMENT (CRD) TO NOTICE OF PROPOSED AMENDMENT (NPA) 2008-22B & 2009-02D

for an Agency Opinion on a Commission Regulation establishing the Implementing Rules for authority requirements

and

draft Decision of the Executive Director of the European Aviation Safety Agency on Acceptable Means of Compliance and Guidance Material related to the Implementing Rules for authority requirements

"Authority Requirements"

COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2008-22c & 2009-02c

for an Agency Opinion on a Commission Regulation establishing the Implementing Rules for organisations in the field of air operations and personnel requirements.

and

a draft Decision of the Executive Director of the European Aviation Safety Agency on Acceptable Means of Compliance and Guidance Material related to the Implementing Rules for organisations in the field of air operations and personnel requirements.

"Organisation Requirements"

CRD c.5 - Definitions & Acronyms (Part-AR and Part-OR)

FOR REFERENCE ONLY

DEFINITIONS USED IN PART AUTHORITY REQUIREMENTS AND PART ORGANISATION REQUIREMENTS

- for reference only -

Term	Part- Subpart	Definition
Acceptable Means of compliance (AMC)	AR.GEN	Acceptable Means of Compliance are non-binding standards adopted by the Agency to illustrate means to establish compliance with the Basic Regulation and its implementing rules
accidental event	OR.OPS.GEN	An event that might cause injury to or loss of life or damage to or loss of property. Note 1: Property may include health, material, functions, public values and reputation. Note 2: An accidental event may be intentional (security related) or unintentional (safety related). Note 3: The term "hazardous event" is often used simultaneously.
additional means of compliance	AR.GEN	Additional means of compliance are those that propose new means to establish compliance with the Basic Regulation and its implementing rules for which no associated acceptable means of compliance have been adopted by the Agency.
aeroplane variant	OR.OPS.FC	Aeroplane, or a group of aeroplanes, with the same characteristics but which have differences from a base aeroplane which require additional flight crew knowledge, skills, and or abilities that affect flight safety.
alternative means of compliance	AR.GEN	Alternative means of compliance are those that propose an alternative to an existing acceptable means of compliance
audit	AR.GEN	A systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.
barrier	OR.OPS.GEN	Something that can either prevent an event form taking place or protect against its consequences. Note: Barrier may also be referred to as a control or treatment measure
base aeroplane	OR.OPS.FC	An aeroplane, or a group of aeroplanes, designated by an operator or manufacturer and used as a reference to compare differences with other aeroplane types/variants within an operator's fleet.
Basic Instrument Training Device Model (BITD Model)	OR.GEN	A defined hardware and software combination, which has obtained a BITD qualification.
Cabin Crew	OR.OPS.CC	An appropriately qualified crew member, other than a

Term	Part- Subpart	Definition
	•	flight crew or technical crew member, who is assigned by an operator to perform duties related to the safety of passengers and flight during operations.
Code share	AR.GEN	An arrangement under which an operator places its designator code on a flight operated by another operator, and sells and issues tickets for that flight.
consequence	OR.OPS.GEN	Possible outcome or impact of an event. Note 1: There can be more than one consequence from one event. Note 2: Only negative consequences are considered in this context Note 3: Consequences can be expressed qualitatively or quantitatively.
dry lease agreement	OR.OPS.GEN	An agreement between commercial operators pursuant to which the aircraft is operated under the AOC of the lessee.
emergency equipment	OR.OPS.CC	Should be understood as equipment installed/carried to be used in case of abnormal and emergency situations that demand immediate action for the safe conduct of the flight and protection of occupants including life preservation (e.g. drop-out oxygen, axe, fire extinguisher, protective breathing equipment, manual release tool; slide raft).
emergency procedures	OR.OPS.CC	Should be understood as all procedures established by the operator in the operations manual for abnormal and emergency situations. For this purpose, 'abnormal' refers to a situation that is not typical or usual, deviates from normal operation and may result in an emergency.
Flight Data Monitoring (FDM)	OR.OPS.GEN	The pro-active and non-punitive use of digital flight data from routine operations to improve aviation safety.
Flight Instructor (FI)	OR.GEN	An instructor with the privileges to provide training in an aircraft, in accordance with Part-FCL.
Flight Simulation Training Device (FSTD)	OR.GEN	A training device which is: (1) in the case of aeroplanes, a Full Flight Simulator (FFS), a Flight Training Device (FTD), a Flight Navigation Procedures Trainer (FNPT), or a Basic Instrument Training Device (BITD). (2) in the case of helicopters, a Full Flight Simulator (FFS), a Flight Training Device (FTD) or a Flight Navigation Procedures Trainer (FNPT).
frequency	OR.OPS.GEN	A measure of the number of occurrences per unit of time.
FSTD Qualification	OR.GEN	The level of technical ability of an FSTD as defined in the compliance document.
FSTD User	OR.GEN	The organisation or person requesting training, checking or testing through the use of an FSTD to an ATO.
grounding	AR.GEN.4	The formal prohibition of an aircraft to take-off and the taking of such steps as are necessary to detain it
Guidance material	AR.GEN	Non-binding material developed by the Agency that helps to illustrate the meaning of a requirement or specification

Term	Part- Subpart	Definition
		and is used to support the interpretation of regulations and acceptable means of compliance.
hazard	OR.OPS.GEN	The condition, object or activity with the potential of causing injuries to personnel, damage to equipment or structures, loss of material or reduction of ability to perform a prescribed function. Note: Hazard is also often described as a source that could cause harm.
inspection	AR.GEN	An independent documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing or gauging, in order to verify compliance with applicable requirements.
likelihood	OR.OPS.GEN	Chance of something happening. Note: In this guidance material likelihood is used as a general term. The equivalent but more precise terms probability and frequency are often used depending on the context.
normal procedures	OR.OPS.CC	Should be understood as all procedures established by the operator in the operations manual for day-to-day normal operations (e.g. pre-flight briefing of cabin crew, pre-flight checks, passenger briefing, securing of galleys and cabin, cabin surveillance during flight).
Organisation	OR.GEN	Natural or legal person, or part of a legal person, established at one or more than one location, whether or not within the territory of the Member States, holding a certificate or subject to a declaration obligation in accordance with Part-OR.
Other Training Device (OTD)	OR.GEN	A training aid other than an FSTD which provides for training where a complete flight deck or cockpit environment is not necessary.
Principal place of business	OR.GEN	The head office or registered office of the organisation within which the principal financial functions and operational control of the activities referred to in this Part are exercised.
prioritisation of ramp inspections	AR.GEN	The dedication of an appropriate portion of the total number of ramp inspections conducted by or on behalf of a competent authority on an annual basis.
probability	OR.OPS.GEN	Extent to which an accidental event is likely to occur. Note 1: Normally expressed as a number between 0 and 1. Note 2: Frequency rather than "probability" may be used in describing risk. Note 3: Degrees of belief about probability can be chosen as classes or ranks, such as - rare/unlikely/moderately likely/almost certain, or - incredible/improbable/remote/occasional/probable/fre quent.
Qualification Test Guide	OR.GEN	A document designed to demonstrate that the performance and handling qualities of an FSTD represent

Term	Part- Subpart	Definition
(QTG)		those of the aircraft, class of aeroplane or type of helicopter, simulated within prescribed limits and that all applicable requirements have been met. The QTG includes both the data of the aircraft, class of aeroplane or type of helicopter and FSTD data used to support the validation.
ramp inspection	AR.GEN	The inspection of aircraft, of flight and cabin crew qualifications, if applicable, and of flight documentation in order to verify the compliance with the applicable requirements.
Rectification Interval	OR.OPS.GEN	The maximum time an aircraft may be operated between the deferral of an inoperative item and its rectification as specified in the MEL.
residual risk	OR.OPS.GEN	Risk remaining after implementation of risk treatment.
risk acceptance criteria	OR.OPS.GEN	Criteria that form the basis for a decision on acceptable risk. Note 1: Risk acceptance criteria may be expressed qualitatively of quantitatively. Note 2: Acceptable risk is the risk that in the given circumstances is acceptable according to current values in society and the organisation.
risk analysis	OR.OPS.GEN	Systematic process to understand the nature of and to deduce the level of safety risk. The risk analysis involves identifying accidental events and their causes/contributing factors and consequences. Note: Provides the basis for risk evaluation and decisions about risk treatment.
risk assessment	OR.OPS.GEN	The overall process of planning, hazard identification, risk analysis and risk evaluation.
risk evaluation	OR.OPS.GEN	Procedure based on the risk assessment to determine whether acceptable risk has been achieved. Note 1: The process includes identification and documentation of risk reducing measures and recommendations. Note 2: Risk evaluation assists in decisions about risk treatment.
risk identification	OR.OPS.GEN	The process of determining what, where, when, why and how something could happen.
risk management process	OR.OPS.GEN	The systematic application of management policies, procedures and practices to the tasks of communicating, establishing the context, identifying, analysing, evaluating, treating, monitoring and reviewing risk.
risk reduction	OR.OPS.GEN	Actions taken to lessen the likelihood, negative consequences, or both, associated with a safety risk.
risk treatment	OR.OPS.GEN	Process of selection and implementation of measures to modify risk. Note 1: The term 'risk treatment' is sometimes used for the measures themselves. Note 2: Risk treatment measures can include avoiding,

Term	Part- Subpart	Definition
	-	modifying, sharing or retaining risk.
risk/safety risk	OR.OPS.GEN	The likelihood of injury to personnel, damage to equipment or structures, loss of material or reduction of ability to perform a prescribed function, measured in terms of probability and severity. Expression for the combination of the probability of an accidental event and its consequence.
safety	OR.OPS.GEN	The state in which the risk of harm to persons or property damage is reduced to, and maintained at or below, an acceptable level through a continuing process of hazard identification and risk management.
safety equipment	OR.OPS.CC	Should be understood as equipment installed/carried to be used during day-to-day normal operations for the safe conduct of the flight and protection of occupants (e.g. seatbelts, infant/extension seatbelts, child restraint device, safety card, safety demonstration kit).
stakeholders	OR.OPS.GEN	Those persons and organisations who may affect, be affected by, or perceive themselves to be affected by a decision, activity or risk.
threat	OR.OPS.GEN	Something that can release a hazard.
wet lease agreement	OR.OPS.GEN	An agreement between commercial operators pursuant to which the aircraft is operated under the AOC of the lessor.

ACRONYMS/ABBREVIATIONS USED IN PART AUTHORITY REQUIREMENTS AND PART ORGANISATION REQUIREMENTS

a/c	aircraft
AAL	above aerodrome level
ACAS	airborne collision avoidance system
AD	Airworthiness Directive
AeMC	aero-medical centre
AFIS	aerodrome flight information service
AGL	above ground level
AIS	aeronautical information service
ALARP	as low as reasonably practicable
AMC	Acceptable Means of Compliance
AME	aero-medical examiner
AMM	aircraft maintenance manual
ANSP	air navigation service provider
AoA probe	angle of attack probe
AOC	air operator certificate
APU	auxiliary power unit
AR	Authority Requirements
ARINC	Aeronautical Radio Incorporated
ASC	Air Safety Committee
ASE	altimeter system error
ATA	Air Transport Association
ATC	air traffic control
ATO	air training organisation
ATO	approved training organisation
ATPL	airline transport pilot licence
ATQP	alternative training and qualification programme
ATS	air traffic services
BITE	built-in test equipment
BPL	balloon pilot licence
BRNAV	basic area navigation
C/B	circuit breaker
CA	commercial aviation
CBT	computer-based training
CC	cabin crew
CCTV	closed circuit television
CDL	configuration deviation list
CFI	chief flight instructor
CM	compliance monitoring
CMP	compliance monitoring programme
CMS	compliance monitoring system
CMS	central maintenance system

СОР	code of practice
CPL	commercial pilot licence
CPL(A)	commercial pilot licence (aeroplane)
CPL(H)	commercial pilot licence (helicopter)
CQB	central question bank
CRI	class rating instructor
CRM	crew resource management
CRT	comment response tool
CS	Certification Specifications
СТКІ	chief theoretical knowledge instructor
DG	dangerous goods
DH	decision height
DI	daily inspection
EASA	European Aviation Safety Agency
EC	European Commission
ECG	electro-cardiogram
EFB	electronic flight bag
EGPWS	enhanced ground proximity warning system
EICAS	engine indicating and crew alerting system
ELT	emergency locator transmitter
ERP	emergency response plan
ESSG	European SAFA Steering Expert Group
ETOPS	extended range twin-engine operations
EU	European Union
FAA	Federal Aviation Administration (USA)
FC	flight crew
FCL	flight crew licensing
FDM	flight data monitoring
FFS	full flight simulator
FH	flight hour
FI	flight instructor
FMECA	failure mode, effects and criticality analysis
FMGC	flight management and guidance computer
FMS	flight management system
FNPT	flight and navigation procedures trainer
FOD	foreign object damage
FSTD	flight simulation training device
ft	foot / feet
FTD	flight training device
FTE	full-time equivalent
GEN	general
GM	Guidance Material
GMP	general medical practitioner

GPWS	ground provimity warning system
HAZID	ground proximity warning system hazard identification
HEMS	
	helicopter emergency medical service
HHO	helicopter hoist operations
HPL	human performance and limitations
HT	head of training
IATA	International Air Transport Association
ICAO	International Civil Aviation Organisation
IFR	instrument flight rules
ILS	instrument landing system
IOS	instructor operating station
IR	Implementing Rules / instrument rating
IRI	instrument rating instructor
JAA	Joint Aviation Authorities
JAR	Joint Aviation Requirements
LAPL	light aircraft pilot licence
LIFUS	line flying under supervision
LOE	line oriented evaluation
LOFT	line oriented flying training
LOQE	line oriented quality evaluation
LVO	low visibility operations
m	metre
MCC	multi crew cockpit
MCCI	multi crew cooperation instructor
MEL	minimum equipment list
MLW	maximum landing weight
MMEL	master minimum equipment list
MNPS	minimum navigation performance specifications
MPA	multi pilot aeroplane
MPH	multi pilot helicopter
MPL	multi-crew pilot licence
MQTG	master qualification test guide
MS	Member State
MTOM	maximum take-off mass
MTOW	maximum take-off weight
NAA	national aviation authority
NM	nautical mile
NOTAM	notice to airmen
NOTECHS	non-technical skills (evaluation)
NPA	Notice of Proposed Amendment
NVIS	night vision imaging system
ODR	operator difference requirements
OPC	operator proficiency check
OPS	operations
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OR	Organisation Requirements
OSD	operational suitability data
OTD	other training device
PBE	protective breathing equipment
PHA	preliminary hazard analysis
POM	proof of match
PPL	private pilot licence
PRNAV	precision area navigation
QTG	qualification test guide
R/T	radio telephony
RAT	ram air turbine
RI	ramp inspector
RITO	ramp inspector training organisation
RNAV	area navigation
RNP-X	required navigation performance - X
RVR	runway visual range
RVSM	reduced vertical separation minima
S/N	serial number
SAFA	
SARPs	safety assessment of foreign aircraft Standards and Recommended Practices (ICAO)
SD SEP	Safety Directive
SFI	single-engine piston
	synthetic flight instructor safe forced landing
SFL	
SIB	stakeholder
	safety information bulletin (EASA)
SIC SLMG	safety information communication (JAA)
	self-launching motor glider
SMM	safety management manual
SMS	safety management system
SOPs	standard operating procedures
SPL	sailplane pilot licence
STC	supplemental type certificate
STD	Standard
STI	synthetic training instructor
TAT probe	total air temperature probe
TAWS	terrain awareness warning system
TC	technical crew
TCAS	type certificate
TCAS	traffic alert and collision avoidance system
TI	Technical Instructions
TK	theoretical knowledge
TMG	touring motor glider
TRE	type rating examiner

TRI	type rating instructor
TRTO	type rating training organisation
TVE	total vertical error
UN	United Nations
VFR	visual flight rules
WGS 84	world geodetic system 84
WP	working paper (JAA)
X-REF	cross-reference
ZFTT	zero flight-time training