



Answers to questions submitted by the question form:

Question: In the NPA there are some higher technical specification in regards to safety requirement acc. ICAO SARPs. Are these higher requirements are based on avail. data or studies or where do the deviations from ICAO SARPs come from?

Dual use (military/civil use) airports are binded to military requirements. Do you give these airports more consideration in regards of exceptions + flexibility?

Answer: In the BR Article 1 is stated "This Regulation shall not apply to: ... aerodromes or part thereof, as well as equipment, personnel and organisations, referred to in paragraph 1(c) and (d), that are controlled and operated by the military;" These aerodromes are therefore out of the scope of the Basic Regulation and do not need any special considerations to be taken. Art. 1.3 applies.

Question: G. Kessler said that many comments (of the NPA) were copied and paste. Are those comments going to be "weighed"? (according to quantity)

Example = 10 comments (copied and paste) = 1 comment worth

or 10 comments (copied and paste) = 10 comment worth

(on one subject/article)

Answer: Importance of a comment is given by its substance only. So a copy-pasted comment has no real added value, especially when made by an association and pasted also by stakeholders associated in this respective association. However the cooperation between stakeholders when commenting the proposal is welcomed and this is worth to be indicated.

Question: Why a rulemaking group on "Apron management" should be isolated?

In BR Article 8a 2(e) it's said that: "... providers of apron management services shall be allowed to declare their capability..." For me this means that there is no regulatory framework is necessary which would lead into a certification. Here only a common agreed standard with the competent authority on the tasks and education at apron management is needed. (Boris Wilke, Fraport)

Answer: The provision of apron management services are included in the aerodrome certificate, but according to Article 8a (e) it is a decision of the Member State to derogate from Article 8a (d) and allow the providers of the apron management services to declare their capability and means of discharging the responsibilities associated with the services provided. Hence, the provision of this service should be made subject to the regulatory framework, notwithstanding the option for the NAA to derogate from the respective requirements.

Question: Reference code:

If the ASDA and TODA are to be used for the determination of the aerodrome reference code number does it mean that a 1400m runway intended for 2C aeroplanes should be a 3C runway and that the related specifications shall be reduced with a possible impact on load for a/c operators?

Answer: The proposal for establishing Aerodrome reference code, set out in the NPA 2011-20, Book 1, CS-ADR-DSN.A.005, that the Code number is composed of the greater of TODA or ASDA will be reviewed to the original table as in ICAO, Annex 14, Volume I. The Aerodrome reference code is composed of two elements Code number, which is based on Aeroplane reference filed length and Code letter, which is based on aeroplane wingspan and outer main gear wheel span.

In regards to the question, ICAO Annex 14, Volume I, paragraph 1.7 and Table 1.1 stipulates the runway code number/runway length relationship: a code 3 runway is "1 200 m up to but not including 1 800 m". Therefore a 1400m runway should be code 3. The runway code letter is dependent on the wingspan and outer main gear wheel span of aeroplanes intended to use the runway.

Paragraph 3.1.10 stipulates the minimum runway width for combinations of runway code number and letter; e.g. Code 3 runways where the code letter is A, B or C should have a minimum width of 30 m and for code letter D, 45 m.



It is not clear from the question why a 1400 m runway is intended for code 2C aeroplanes when it is a code number higher and available for use by code 3 aeroplanes, A, B, C or D (depending on runway width and performance parameters of the aeroplane vis-à-vis the actual declared distances). If the question arises because the OLS, runway strip and infrastructure separation distances have been set at runway code 2 criteria, then that is the aerodrome operator's choice, and could possibly impose an operational limitation on aeroplane types that can use the aerodrome.