

European Aviation Safety Agency

**Comment Response Document (CRD)
on Consultation paper nr. 10 of 29 July 2003**

**CS-AWO
Certification Specifications for all weather operations**

Foreword to the Comment Response document (CRD)

To give a rapid overview of the CRD, the following keywords were used in responding to comments:

- “Carried”: The proposed amendment is wholly transferred to the revised text.
- “Noted”: The comment is acknowledged and where needed the text has been improved.
- “Deferred”: The comment requires further assessment by the Agency under its future rulemaking programme.
- “Disagreed”: The comment is not shared by the Agency.

CRD - CS - AWO Book 1&2

General Comments

Para.

31 / AECMA

Comment

The draft CS-AWO includes the JAR NPA AWO 12 for "super fail passive" category 3 operations. It is clearly stated in this NPA preamble that compliance with its additional requirements is optional, since not all aircraft are considered suitable for this type of operation. However, there is no indication for some of the NPA additional requirements (AMC-AWO 161(b)(3), CS-AWO 304(c), ...) that they are optional, so that their inclusion in CS-AWO would create an inconsistency with current provision for approval of "fail passive" category 3 operations. The JAR NPA AWO 12 should be removed from the CS-AWO and re-submitted within the JAA inventory to EASA.

Response

Deferred.
The NPA AWO 12 was adopted by the JAAC and the final text included without change in CS-AWO. The discussion on the incorporation of NPA-AWO-12 will be in the JAA Inventory for the transition to EASA.

48 / CAA Sweden

Comment

With reference to the Consultation Papers concerning certification specifications (CS) mentioned above, we would like to make the following comments.

Since the proposed certification specifications contain regulatory material which, essentially, is identical to the content of the corresponding JARs, we are in favour of the proposed material.

However, should the proposals not have the same content as those JARs, there must be a possibility to rediscuss such items.

Response

Noted

B1 - SUB 1 - CS-AWO 140

Para.

13 / CAA UK

Comment

CS AWO 140 final para refers to Annex 14, Chicago Convention, This should be ICAO Annex 14. This is a general comment as the term "Chicago Convention" is used throughout the new CS-AWO in lieu of ICAO.

Response

Disagreed.
The reference as used in CS-AWO is consistent with the Basic Regulation Article 3b and with Part 21.

B1 - SUB 2 - CS-AWO 200

Para.

13 / CAA UK

Comment

CS AWO 200. It is noted that paragraph CS-AWO 200 is titled Applicability and Terminology. The corresponding paragraphs in Subparts 1, 3 and 4 i.e. CS-AWO 100, 300 and 400, are titled Applicability and Definitions. The title of CS-AWO 200 should be changed to "Applicability and Definitions" in line with CS-AWO 100, 300 and 400.

Response

Noted.
In stead of the term "definitions" the term "terminology" is consistently used in all CS. Text of CS-AWO 100, -300 and -400 is changed accordingly.

B1 - SUB 2 - CS-AWO 221

Para. (f)

13 / CAA UK

Comment

CS AWO 221 (f) Installed Equipment. Delete unnecessary sub-heading "CS-AWO 221 (continued)", and replace with text "failure (for automatic approach;)". Text will therefore read:
(f) Audible warning of automatic pilot failure (for automatic approach);

Response

Carried

B1 - SUB 3 - CS-AWO 300

Para.

13 / CAA UK

Comment

CS AWO 300 Applicability and Definitions. Sub-para. AWO 300 (b)(3), first word should read 'Fail'.

CS AWO 300 Applicability and Definitions. Sub-para. AWO 300 (b)(4), delete underlining after "Landing System: An automatic"

Response

Carried

B1 - SUB 4 - CS-AWO 481

Para.

13 / CAA UK

Comment

CS AWO 481 General. Remove unnecessary subheading "WARNINGS", at end of sub-paragraph.

Response

Noted

This error was introduced by the conversion into pdf format.

B2 - SUB 1 - AMC-AWO 131

Para.

13 / CAA UK

Comment

AMC AWO 131 Figure 1. The x-axis of the graph is given in knots (retained from existing JAR AWO) resulting in this being totally inconsistent with the rest of the CS changes.

Response

Deferred.

The full conversion of units of measurement into SI was not achieved for practical reasons (see explanatory memorandum). However consistency is still achieved because all the imperial units are kept between brackets. The Agency will continue to convert all units (in particular formulae and graphs).

other

Para.

38 / ACG

Comment

CS-AWO is acceptable for ACG.

Response

Noted.