COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2011-20 (B.III) CORRIGENDUM

'Authority, Organisation and Operations Requirements for Aerodromes'

(B.III (corrigendum) CRD to NPA 2011-20 (B.III (corrigendum) — CS-ADR Book 1 and 2 - Table J-1 to Book 1 Subpart J

IV. CRD table of comments, responses and resulting text

(General Comments)	-

comment	*3* comment by: *ACI EUROPE - Airports Council International* There are chapters, which are making reference to tables which are not included.
response	*Accepted* The tables will be included.

comment	*4* comment by: *ACI EUROPE - Airports Council International*
response	*Accepted* References will be amended to align with EASA text

comment	*5* comment by: *ACI EUROPE - Airports Council International* The provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are not satisfactorily reflected in the NPA documents. It is notably due to the fact that recommendations have been transposed to the same level as standards.
response	*Noted*

Flexibility is provided by the ELOS and SC mechanisms.

comment *13* comment by: *Pau Pyrénées Airport - PUF/LFBP*

It is appropriate to modify the note (c) in the following way: distance: "distance to 60 m beyond the runway end."

The distance of 60 m corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond this distance. For technical reasons, the obstacle limitation surfaces related to interrupted take-off surface are related to this distance and not to the end of the runway strip which can be much longer.

response *Noted*

Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

Table J-1 – Dimensions and slopes of obstacle limitation surfaces — Approach runways p. 3-4

comment *6* comment by: *Advizer*

Table is correct now

response *Noted*

comment *7* comment by: *AIRBUS*

PROPOSED TEXT / COMMENT:
e. Where the code letter is F, the width is increased to 155 m. For information on code letter F aeroplanes equipped with digital avionics that provide steering commands to maintain an established track during the go-around manoeuvre**, see ICAO Circular 301 — *New Larger Aeroplanes — Infringement of the Obstacle Free Zone: Operational Measures and Aeronautical Study*.**

RATIONALE / REASON / JUSTIFICATION for the Comment:
Note e. is incomplete compared to ICAO Annex 14.

response *Not accepted*

The text following '…to 155 m.' is an operational consideration and will be moved to GM.

comment 8 comment by: *Union des Aéroports français - UAF*

Attachment #1

UAF NPA 2011-20 (B.III) CS-ADR-DSN Table J-1 Corrigendum
Référence: CS-ADR-DSN Corrigendum
Table J-1 Obstacle limitation requirements
Note (c) "distance to the end of strip"

Traduction de courtoisie
It is appropriate to modify the note (c) in the following way: distance: "distance to 60 m beyond the runway end."
The distance of 60 m corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond this distance. For technical reasons, the obstacle limitation surfaces related to interrupted take-off surface are related to this distance and not to the end of the runway strip which can be much longer.

response *Noted*

Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

comment 9 comment by: *ADP : Aeroports de Paris*

Référence: CS-ADR-DSN Corrigendum
Table J-1 Obstacle limitation requirements
Note (c) "distance to the end of strip"

Proposition/commentaire Il conviendrait de modifier la note (c) de la manière suivante : distance : "distance to 60 m beyond the runway end."

Justification La distance de 60 m correspond à la longueur minimale de la bande de piste au-delà de l'extrémité de piste. Il est fréquent d'avoir des bandes de piste se terminant au-delà de cette distance. Pour des raisons techniques, les surfaces de limitation d'obstacles liées à la surface d'atterrissage interrompu sont en rapport avec cette distance et non avec la fin de la bande de piste qui peut avoir une longueur bien supérieure.

Traduction de courtoisie
It is appropriate to modify the note (c) in the following way: distance: "distance to 60 m beyond the runway end."

The distance of 60 m corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond this distance. For technical reasons, the obstacle limitation surfaces related to

interrupted take-off surface are related to this distance and not to the end of the runway strip which can be much longer.

response *Noted*

Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

comment *10* comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- CS-ADR - Book 1 - CS-ADR-DSN.A.002 — Definitions (p4-9)
- CS-ADR - Book 1 – CS-ADR-DSN. H.420 — Inner horizontal surface (p37-38)
- CS-ADR - Book 1 – CS-ADR-DSN.H.430 — Transitional surface (p38-39)
- CS-ADR - Book 1 – CS-ADR-DSN.H.455 — Inner transitional surface (p43-44)
- (B.III) corrigendum - Table J-1 – Dimensions and slopes of obstacle limitation surfaces — Approach runways (p3-4)

2. Justification and proposed text / comment
This comment is linked with comment 826 in book III.
These provisions are to be reviewed to take into account the concept of "support line" that has been adopted by the group ADR.003 as an alternative of the contour the runway strip.
For recall, this concept permits to solve the issues raised when the dimensions of the runway strip are much greater than the minimum value required. In these cases, the "support line" of OLS, particularly the support line of the transitional surfaces, is not coincident with the contour of the runway strip. Thus it is essential to be able to establish OLS independently from the contour of the runway strip, which is allowed by this concept.
For instance, the distance of 60m in note (c) of table J-1 corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond this distance. For technical reasons, the obstacle limitation surfaces related to interrupted take-off surface are related to this distance and not to the end of the runway strip.
Note: the concept of the support line enables to manage both the case where the runway strip is coincident with the support line and the cases where it is not coincident. Thus, the redaction with the strip could be deleted without any consequence.

This concept has already been taken into account in CS on transitional surfaces (for instance CS-ADR-DSN.H.430), which is a good thing, but it is essential to use it also for other OLS when the strip is used in order to harmonize the design.

Thus the following proposed modifications:

***"'Obstacle free zone (OFZ)'** means the airspace above the inner approach surface, inner transitional surfaces, and balked landing surface and that*

portion of the strip bounded by these surfaces or, when the support line is not coincident with the strip, the portion of ground bounded by the support line which is not penetrated by any fixed obstacle other than a low-mass and frangibly mounted one required for air navigation purposes."

Table J-1 – Dimensions and slopes of obstacle limitation surfaces — Approach runways * Note (c)

"c. Distance to the end of strip or, when the runway strip is not coincident with the inner edge of the approach surface, to 60 m beyond the runway end."

CS-ADR-DSN. H.420 — Inner horizontal surface

"[…]*(c) Characteristics: The outer limits of the inner horizontal surface are defined by circular arcs centred on the intersection of the extended RWY centre line with the end of the RWY strip or, when the runway strip is not coincident with the inner edge of the approach surface, with the vertical line passing through the middle of the inner edge of the approach surface, joined tangentially by straight lines. ~~(Figure H-1.)~~*
[…]"

Editorial improvement of CS-ADR-DSN.H.430 — Transitional surface

"[…]
(b) Description:[…]
(2) Where the transitional surface is not coincident with the runway strip: a complex surface along the side of a support line, parallel to and at a ~~specified~~ distance specified in table H-1 from the runway centre line, and part of the side of the approach surface, that slopes upwards and outwards to the inner horizontal surface.
(c) Characteristics: The limits of a transitional surface should comprise:
(1) Where the transitional surface is coincident with the runway strip:
(i) a lower edge beginning at the intersection of the side of the approach surface with the inner horizontal surface and extending down the side of the approach surface to the inner edge of the approach surface and from there along the length of the strip parallel to the runway centre line; and
~~(2)~~(ii) An upper edge located in the plane of the inner horizontal surface; or
~~(3)~~ (2) Where the transitional surface is not coincident with the runway strip:
(i) a lower edge beginning at the intersection of the side of the approach surface with the inner horizontal surface and extending down the side of the approach surface to the inner edge of the approach surface and from there along a support line parallel to the runway centre line, whose distance to the runway centre line is according to table H-1 below; and
(ii) An upper edge located in the plane of the inner horizontal surface.
[…]"

CS-ADR-DSN.H.455 — Inner transitional surface

"[…]
(b) Characteristics: The limits of an inner transitional surface should comprise:
(1) Where the transitional surface is coincident with the runway strip:
(i) a lower edge beginning at the end of the inner approach surface and extending down the side of the inner approach surface to the inner edge of that surface, from there along the strip parallel to the runway centre line to the inner edge of the balked landing surface and from there up the side of the balked landing surface to the point where the side intersects the inner horizontal surface; and
~~(2)~~(ii) an upper edge located in the plane of the inner horizontal surface.

(2) Where the transitional surface is not coincident with the runway strip:
(i) a lower edge beginning at the intersection of the side of the approach surface with the inner horizontal surface and extending down the side of the approach surface to the inner edge of the approach surface and from there along the support line parallel to the runway centre line, at a specified distance to the runway centre line indicated in table H-2 below; and
(ii) An upper edge located in the plane of the inner horizontal surface.
(c) The elevation of a point on the lower edge should be:
(1) along the side of the inner approach surface and balked landing surface — equal to the elevation of the particular surface at that point; and
(2) along the strip — equal to the elevation of the nearest point on the centre line of the runway or its extension.
(3) Along the transitional surface support line – equal to the elevation of this line at that point.
[…]"
Table H-2: distance between inner transitional surface support line and runway centre line

	Precision approach Category I		*Precision approach Category II or III*
Runway code	*1,2*	*3,4*	*60 m*
	45 m	*60 m*	

response *Noted*

Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

The following two items from comment 826 are addressed in the CRD and do not relate to Table J-1:

CSADR-DSN.H.420: Not Accepted — The ICAO concept will be used.

CS ADR-DSN.H.430: Noted the improved editorial comments: This is confusing as the distances for the 'support line' in Table H-1 are the same as those in ICAO for the Transitional Surface.

comment *11* comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- (B.III) corrigendum - Table J-1 – Dimensions and slopes of obstacle limitation surfaces — Approach runways (p3-4)

2. Justification and proposed text / comment
In the note (b), the references are erroneous: the CSs specifying the length are CS-ADR-DSN.J.475 (c) and CS-ADR-DSN.J.480 (e).

	"b. Variable length (CS-ADR-DSN.J.~~455~~475 (c) or CS-ADR-DSN.J.~~460~~480 (e))."
response	*Accepted*

comment	*12* comment by: *HIA - Highlands and Islands Airports Limited* Conical surface 1. Add to the table that the height of conical surface is its height above the inner horizontal surface and not above threshold elevation. The text in the main document does make this point. 2. In the UK height of the conical surface is 105m above the inner horizontal surface for all runways except for non instrument codes 1 and 2. The proposed heights could be restrictive for the non precision approaches to the smaller island airports who operate aslifeline services to the communities. We would wish to retain the existing UK dimensions. Approach surface In the UK the length of the second section of the approach is 2500m (not 12000m) with a horizontal section of 9500m length. Whilst this is more restrictive than the proposed dimensions it does give more protection to the approach and fits logically with the other runway dimensions.
response	*Not accepted* The ICAO specifications in the NPA will apply; the NAA has the flexibility to accept other proposals as Special Conditions.

comment	*14* comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD* Attachment #2 ADBM NPA 2011-20 (B.III) CS-ADR-DSN Table J-1 Corrigendum Référence: CS-ADR-DSN Corrigendum Table J-1 Obstacle limitation requirements Note (c) "distance to the end of strip" Traduction de courtoisie It is appropriate to modify the note (c) in the following way: distance: "distance to 60 m beyond the runway end." The distance of 60 m corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond

this distance. For technical reasons, the obstacle limitation surfaces related to interrupted take-off surface are related to this distance and not to the end of the runway strip which can be much longer.

response

Noted

Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

comment

15 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: CS-ADR-DSN Corrigendum

Table J-1 Obstacle limitation requirements
Note (c) "distance to the end of strip"

Proposition/commentaire
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Justification
La distance de 60 m correspond à la longueur minimale de la bande de piste au-delà de l'extrémité de piste. Il est fréquent d'avoir des bandes de piste se terminant au-delà de cette distance. Pour des raisons techniques, les surfaces de limitation d'obstacles liées à la surface d'atterrissage interrompu sont en rapport avec cette distance et non avec la fin de la bande de piste qui peut avoir une longueur bien supérieure.

Traduction de courtoisie
It is appropriate to modify the note (c) in the following way: distance: "distance to 60 m beyond the runway end."

The distance of 60 m corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond this distance. For technical reasons, the obstacle limitation surfaces related to interrupted take-off surface are related to this distance and not to the end of the runway strip which can be much longer.

response

Noted

Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

comment

16 comment by: *ATB Aéroport Toulouse-Blagnac - TLS/LFBO*

Attachment #3

	ATB NPA 2011-20 (B.III) CS-ADR-DSN Table J-1 Corrigendum Référence: CS-ADR.DSN Corrigendum Table J-1 Obstacle limitation requirements Note (c) "distance to the end of strip" Traduction de courtoisie It is appropriate to modify the note (c) in the following way: distance: "distance to 60 m beyond the runway end." The distance of 60 m corresponds to the minimal length of the runway strip beyond the runway end. It is frequent to have runway strips ending beyond this distance. For technical reasons, the obstacle limitation surfaces related to interrupted take-off surface are related to this distance and not to the end of the runway strip which can be much longer.
response	*Noted* Note (c) applies to the balked landing surface for precision approach runways CAT I for runways Code 1 and 2; the balked landing surface begins at the threshold and extends to the end of the runway strip.

Appendix A - Attachments

UAF NPA 2011-20 (B.III) CS-ADR-DSN. Corrigendum.pdf
Attachment #1 to comment #8

ADBM NPA 2011-20 (B.III) CS-ADR-DSN. Corrigendum.pdf

Attachment #2 to comment #14

ATB NPA 2011-20 (B.III) CS-ADR-DSN Table J-1 Corrigendum.pdf