



**COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2011-20 (C)**

**'(C) Authority, Organisation and Operations Requirements for Aerodromes – Cross
References'**

IV. CRD table of comments, responses and resulting text

(General Comments)	-
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comment	1	comment by: <i>Belgian CAA</i>
	<p>It was interesting for reviewing the NPA to have a cross reference table linking the NPA provisions to the ICAO Annex 14 standards and recommendations. On the other hand, a cross reference table doing the opposite (linking Annex 14 to the NPA) was lacking. For member states that want to ensure that at least the level of safety foreseen by ICAO Annex 14 was covered, this information would have been even more interesting.</p>	
response	<p>Noted</p> <p>EASA is endeavouring to provide a more complete comparison to ICAO provisions in an effort detached from the ADR rulemaking project.</p>	

comment	7	comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>
	<p>NPA 2011-20 (B.I-III) Com gal 5 Commentaires ACA <u>Forme</u> <u>Commentaire</u> La structure des règles et les références croisées rendent la lecture des documents complexe et difficile à comprendre. <u>Traduction de courtoisie</u> The structure of the rules and cross references makes the document complex to read and understand.</p>	
response	<p>Noted</p>	

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comment	3	comment by: <i>UK CAA</i>
	<p>Page No: 1</p> <p>Paragraph No: Not Applicable</p> <p>Comment: There is no cross reference to ICAO Annex 15, Chapter 10 – Electronic Terrain and Obstacle Data standards and recommended practices.</p>	

The ICAO European Air Navigation Planning Group (EANPG) has asked ICAO H.Q. to consider the inclusion of appropriate provisions related to eTOD in ICAO Annex 14. It is considered important that the eTOD requirements are included in Annex 14 and thereby linked to the certification/licensing of aerodromes.

It is of significant concern that this regulation has not been considered when developing the NPA in respect of the Management of aeronautical data and aeronautical information.

Immediate action is required to address this oversight and ensure harmonisation of the Authority, Organisation and Operations Requirements for Aerodromes with ICAO Annex 15, Chapter 10.

response Noted

Just current version of Annex 14 was considered. The Agency is aware of the importance of eTOD requirements.

Cross references — Annex II — Part-OR

p. 6-13

comment

2

comment by: *pandrade*

See Comment B.I 3414

ADR.OR.C010

I propose to eliminate do to different reasons:

1 - The pilot as the responsibility for landing in one aerodrome not the aerodrome operator. At the AIP the pilot and the company of the aircraft can see all the characteristics of the aerodrome. They take the decision of using or not one aerodrome.

2 - Neither the aerodrome operator nor the Director of the aerodrome can be obliged to know the code letters of all the aircrafts

3 - The aerodrome operator when is informed that an aircraft is coming to his aerodrome, even if he know that has an higher letter than the aerodrome design characteristics, as no time to ask to the competent authority approval for using the aerodrome.

response

Noted

Answer is given under respective article.

comment

4

comment by: *UK CAA*

see comment B.I 1822

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Paragraph No: ADR.OR.D.007 - Management of aeronautical data and

aeronautical information.

(Comment is not exclusive to the above section and should be considered in respect of all references to data management within document).

Comment: The European Commission adopted on 26 January 2010 the Regulation EC 73/2010 laying down requirements on the quality of aeronautical data and aeronautical information for the single European sky. The overall objective of this rule is to achieve aeronautical information of sufficient quality, accuracy, timeliness and granularity as a key enabler of the European ATM Network.

Working Group comment against cross reference to EC 73/2010 states that there is no proposal and the article was added by the agency. EC member states are currently working towards implementation of the requirements by July 2013.

It is of significant concern that this regulation has not been considered when developing the NPA in respect of the Management of aeronautical data and aeronautical information.

Immediate action is required to address this oversight and ensure harmonisation of the Authority, Organisation and Operations Requirements for Aerodromes with EC 73/2010.

response

Noted

Answer is given under the respective article.

Cross references AMC to Part-OPS

p. 17-28

comment

5

comment by: *Airport Nuremberg - NUE/EDDN*

See Comment B.II 2613

The second AMC4-ADR-OPS.B.010 (h) should be changed to (i).

response

Noted

comment

6

comment by: *Airport Nuremberg - NUE/EDDN*

See Comment B.II 2614

Second AMC8-ADR-OPS.B.075 should be changed to AMC9-ADR-OPS.B.075

response

Noted

These AMCs do not exist anymore.

