



**COMMENT RESPONSE DOCUMENT (CRD)  
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2009-02F**

**for an Agency Opinion on a Commission Regulation establishing the Implementing  
Rules for air operations of Community operators**

**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 air operations of Community operators**

*“Cross-Reference Tables”*

**CRD c.1 – Comments received on NPA 2009-02f**

## I. Comments received on NPA 2009-02f

**(General Comments)**

-

comment 13

comment by: *Joerg Baudach*

Dear ladies and gentlemen,  
 in due to the large numbers of dokuments of the NPA 2009- 02 a-f, it wont be possible to read and comment them until the 30.05.2009.

I am the flight operation manager of the DRF Luftrettung, wich is operating in HEMS and world wide ambulance flights.

I talked to other Operators, wich do have the same problem.

We all have not enough personal to read and comment until your given time line.

The EHAC and EHA will also send quite the same comments.

So please think about a longer time to comment.

My wish would be 31.10.2009 time limit.

Best regards

Jörg Baudach

comment 42

comment by: *Welcome Air*

- Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
- Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
- Aircraft cockpit security should be included in Chapter 10 of EU300/2008

comment 50

comment by: *AEA*

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.

Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.

Aircraft cockpit security should be included in Chapter 10 of EU300/2008, once Competence is decided for 'In Flight' issues"

comment 53 comment by: *AUSTRIAN Airlines*

- Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
- Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
- Aircraft cockpit security should be included in Chapter 10 of EU300/2008, once Competence is decided for 'In Flight' issues"

comment 55 comment by: *TAP Portugal*

**2009-02F Cross Reference Tables**

**Association comment**

1. Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
2. Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
3. Aircraft cockpit security should be included in Chapter 10 of EU300/2008, once Competence is decided for 'In Flight' issues"

comment 56 comment by: *bmi*

It is the opinion of bmi that EASA should consider the comments submitted by the United Kingdom CAA and the Association of European Airlines (AEA). bmi concur with the opinions submitted by these organisations.

comment 68 comment by: *Embraer - Indústria Brasileira de Aeronáutica - S.A.*

There are references to OPS.CAT.435, OPS.CAT.435 - Table 1, OPS.CAT.435 - Table 2, and AMC OPS.CAT.435(c)(3) in the EU/JAR-OPS/EASA references in NPA 2009-02f, but these items are missing in NPA 2009-02b

**TABLE OF REFERENCE FOR NPA 2009-02**

p. 2

comment 59 comment by: *Swiss International Airlines / Bruno Pfister*

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.

Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.

Aircraft cockpit security should be included in Chapter 10 of EU300/2008, once Competence is decided for 'In Flight' issues"

comment 70

comment by: IATA

Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.

Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.

Aircraft cockpit security should be included in Chapter 10 of EU300/2008, once Competence is decided for 'In Flight' issues"

<b>TABLE OF CONTENTS FOR NPA 2009-02F</b>
---

p. 3

comment 36

comment by: CAA-NL

**1. Comment CAA-NL:**

OPS.SPA.045.DG & AMC OPS.SPA.045.DG (2) are not correct.

**Justification:**

EU/JAR-OPS 1/3.420(d) is reflected in OPS.GEN.030. This is a more appropriate location, since the requirement to report applies to all operators irrespective of whether an approval to carry dangerous goods is held.

**2. Comment CAA-NL:**

It is not clear how the "terminology" of EU-OPS has been addressed, since the "EASA reference" refers only to completion of the dangerous goods incident report form.

**3. Comment CAA-NL:**

The EASA reference of OPS.SPA.001.DG (a) is incorrect

**Justification:**

The correct reference is AMC OPS.GEN.030 1.

**Proposal CAA-NL:**

In the "EASA reference" column against IEM OPS 1/3.1165(b)(1) replace "OPS.SPA.001.DG (a)" with "AMC OPS.GEN.030 1."

comment 54

comment by: bmi REGIONAL

It is the opinion of bmi regional that EASA should seriously consider the recently submitted comments made by the CAA and those of the AEA and we align our opinion with those submitted by these organisations.

## F. EU/JAR-OPS reference – EASA reference

p. 4-112

comment 19 comment by: *ECA - European Cockpit Association*

Comment on JAR-OPS 4.490: change as follows:

~~OPS.COM.315.A~~ OPS.COM.316.A

Justification:

The reference from JAR-OPS 4.490 is erroneously indicated as OPS.COM.315.A instead of OPS.COM.316.A

comment 20 comment by: *ECA - European Cockpit Association*

Comment on EU-OPS 1.490(a): change as follows:

OPS.CAT.316.A(a)(4) ~~(1)~~

Justification:

The reference OPS.CAT.316.A(a)(4)(1) does not exist.

comment 21 comment by: *ECA - European Cockpit Association*

Comment on EU-OPS 1.490(c): change as follows:

~~AMC1 OPS.CAT.327.A (1)~~ AMC1 OPS.GEN.320.A(a)

Justification:

The current reference is for takeoff obstacle requirements and not for takeoff requirements

comment 22 comment by: *ECA - European Cockpit Association*

Comment on Subpart A (page 4):

In column "EASA reference", OPS.CAT.005 is missing as a reference.

comment 24 comment by: *ECA - European Cockpit Association*

Comment on EU-OPS 1.040(a)(page5): EASA reference not correct, (a) should be deleted, no relevance for flight and CC members :

OR.OPS.210.AOC ~~(a)~~(b)(2)

comment 26 comment by: *ECA - European Cockpit Association*

Comment on EU OPS 1.070(b) (page 6): AMC.OPS.CAT.040 (a) not existing, cross-reference invalid.

comment 27 comment by: *ECA - European Cockpit Association*

Comment on EU OPS 1.070(c) (page 6): AMC.OPS.CAT.045 (1) not existing. Logic disarranged!

comment 28 comment by: *ECA - European Cockpit Association*

Comment on EU/JAR-OPS 1/3.115 (page 8): change as follows:  
GM OPS.GEN.015(b)~~(2)~~2.  
Justification:  
Ref should read GM OPS.GEN.015(b)2.

comment 33 comment by: *ECA - European Cockpit Association*

Comment on EU OPS 1.085 (f)(8): missing cross-reference to OPS GEN.015(a)(2). Clarification required.

comment 37 comment by: *Luftfahrt-Bundesamt*

Page 25, EU/JAR-OPS 1/3.420(d):  
EU/JAR-OPS 1/3.420(d) refers to OPS.GEN.030, thus both references, OPS.SPA.045.DG and AMC OPS.SPA.045.DG(2), are not correct and have to be adapted.  
Page 76, EU/JAR-OPS 1/3.1150:  
It is not clear to whom EU/JAR-OPS 1/3.1150 is addressed. The EASA cross-reference only addresses the DGOR form. An adaptation of the cross-reference is proposed.  
Page 111, IEM OPS 1/3.1165(b)(1):  
The reference, OPS.SPA.001.DG (a), is not correct. An adaptation of the cross-reference is proposed.

comment 38 comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

**Concern detail:**

EU/JAR-OPS 1/3.420(d)

**Comment / Proposal:**

EASA reference (OPS.SPA.045.DG & AMC OPS.SPA.045.DG (2)) are not correct. EU/JAR-OPS 1/3.420(d) is reflected in OPS.GEN.030. This is a more appropriate location, since the requirement to report applies to all operators irrespective of whether an approval to carry dangerous goods is held.

comment 39 comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

**Concern detail:**

EU-OPS 1.1150

**Comment:**

It is not clear how the "terminology" of EU-OPS has been addressed, since the "EASA reference" refers only to completion of the dangerous goods incident report form.

comment 40 comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

**Concern detail:**

IEM OPS 1/3.1165 (b) (1)

**Comment / Proposal:**

The EASA reference of OPS.SPA.001.DG (a) is incorrect. The correct reference is AMC OPS.GEN.030 1. In the "EASA reference" column against IEM OPS 1/3.1165(b)(1) replace "OPS.SPA.001.DG (a)" with "AMC OPS.GEN.030 1".

comment 41 comment by: *DGAC*

EU/JAR - OPS 1/3.035 (e) is cross referenced to OR.GEN.210 (c) which is not coherent

comment 43 comment by: *UK CAA*

**Page 25, Paragraph No:** EU/JAR-OPS 1/3.420(d)

**Comment:** References are made to OPS.SPA.045.DG & AMC OPS.SPA.045.DG (2) but these do not appear to exist.

**Justification:** EU/JAR-OPS 1/3.420(d) is reflected in OPS.GEN.030. This is a more appropriate location, since the requirement to report applies to all operators irrespective of whether an approval to carry dangerous goods is held.

**Proposed Text (if applicable):**

Delete "OPS.SPA.045.DG & AMC OPS.SPA.045.DG (2)" and replace with "OPS.GEN.030"

comment 44

comment by: UK CAA

**Page 76, Paragraph No:** EU/JAR-OPS 1/3.1150**Comment:** Irrelevant text.**Justification:** Reference is made to "AMC OPS.SPA.045.DG but this does not appear to exist. In any event, "Terminology" is not relevant to "notes for completion of the form."**Proposed Text (if applicable):**

Delete "EU/JAR-OPS 1/3.1150" and associated text.

comment 45

comment by: UK CAA

**Page 111, Paragraph No:** IEM OPS 1/3.1165(b)(1)**Comment:** The EASA reference of OPS.SPA.001.DG (a) is incorrect.**Justification:** The correct reference is AMC OPS.GEN.030 1.**Proposed Text (if applicable):**

In the "EASA reference" column against IEM OPS 1/3.1165(b)(1) replace "OPS.SPA.001.DG (a)" with "AMC OPS.GEN.030 1."

comment 49

comment by: Boeing

**GENERAL COMMENT:***Reference EU.OPS 1.978, Alternative training and qualification programme*

We note that the Alternative Training and Qualification Programme (ATQP) has been deleted from this NPA, requiring mature airlines with a fully functioning safety system to revert back to prescribed training instead of being able to focus on specific training needs that come through Flight Data Management (FDM) or Safety Management Systems (SMS).

ATQP training and checking is a performance-based way of fulfilling current requirements, and should not be deleted from these rules.

comment 52

comment by: Directflight Limited

**NPA 2009-02f****Page 9 of 182****EU/JAR-OPS reference**

Appendix 1 to EU-OPS 1.005(a)

**Subject**  
aeroplanes

Operations of performance class B

**EASA reference**See provisions applicable in  
OPS.GEN/CAT/COM/SPA relating to  
performance class B aeroplanes



**Subject** Operations of performance class B aeroplanes  
None of the provisions of sub paras (b) (23), (24), (25), or (26) appear to be covered in OPS.GEN/CAT/COM/SPA nor in Part-OPS AMC/GM.

comment 57 comment by: *ECA - European Cockpit Association*

Comment:  
In the table of reference, p. 5, EU OPS 1.025 (b) is inappropriately cross-referenced to OR.OPS.015.MLR (d).

comment 60 comment by: *ECA - European Cockpit Association*

Comment on references regarding AR.CC.200 and AR.CC.205 on page 70:  
Cross-references to EU OPS 1.1005 (d) and (e) are wrong as this paragraph does not have subparagraphs.

comment 62 comment by: *Finnish CAA*

Paragraph No: EU/JAR-OPS 1/3.420(d)  
Comment: EASA reference (OPS.SPA.045.DG & AMC OPS.SPA.045.DG (2)) are not correct.  
Justification: EU/JAR-OPS 1/3.420(d) is reflected in OPS.GEN.030. This is a more appropriate location, since the requirement to report applies to all operators irrespective of whether an approval to carry dangerous goods is held.  
Proposed Text (if applicable):

comment 63 comment by: *Finnish CAA*

Paragraph No: EU/JAR-OPS 1/3.1150  
Comment: It is not clear how the "terminology" of EU-OPS has been addressed, since the "EASA reference" refers only to completion of the dangerous goods incident report form.  
Justification:  
Proposed Text (if applicable):

comment 64 comment by: *Finnish CAA*

Paragraph No: IEM OPS 1/3.1165(b)(1)  
Comment: The EASA reference of OPS.SPA.001.DG (a) is incorrect.

Justification: The correct reference is AMC OPS.GEN.030 1.

Proposed Text (if applicable):

In the "EASA reference" column against IEM OPS 1/3.1165(b)(1) replace "OPS.SPA.001.DG (a)" with "AMC OPS.GEN.030 1."

comment

65

comment by: DGAC

OR.GEN.210 (7) does not exist

comment

66

comment by: DGAC

JAR-OPS 3.080 is cross-referenced to GM OPS.SPA.040.DG (d) and (e), this paragraph does not exist.

comment

67

comment by: DGAC

EU/JAR - OPS 1/3.120 does not seem to match with OPS.GEN.700

## F. EASA reference - EU/JAR-OPS reference

p. 113-182

comment

58

comment by: ERA

### **European Regions Airline Association Comment**

- Security training programmes are already mandated in Chapter 11 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
- Aircraft search procedures are already mandated in Chapter 3 of EU300/2008 – EASA section IX / Subpart S should be amended to reflect this.
- Aircraft cockpit security should be included in Chapter 10 of EU300/2008, once Competence is decided for 'In Flight' issues"