



Comment-Response Document 2014-21

Update of CS ADR-DSN.D.260 Taxiway minimum separation distance

CRD TO NPA 2014-21 — RMT.0591— 29.01.2015

Related Decision 2015/001/R

EXECUTIVE SUMMARY

This Comment-Response Document (CRD) contains the comments received on NPA 2014-21 (published on 3 September 2014) and the responses provided thereto by the Agency.

The purpose of the NPA was to propose amendments to CS ADR-DSN.D.260 'Taxiway minimum separation distance' ('CS-ADR-DSN – Initial issue'). This revision is proposed to be performed in advance of the formal adoption of identical draft changes in the respective ICAO provisions, which are expected to be adopted in 2016. As the European airport industry, together with the respective competent authorities, currently perform a substantial certification process following Commission Regulation (EU) No 139/2014, this certification process would need to take into account these envisaged changes in order to facilitate the process and to avoid unnecessary, potentially significant increase in effort. Therefore, the changes in the respective CS are proposed by the Agency to be adopted without delay.

Commentators strongly and unanimously supported the proposal provided in the NPA. Comments led to further improvements in form of minor administrative changes to related CS and the creation of one new paragraph in GM, to give better clarity of the CS requirement.

For information, the draft CS/GM is published in this CRD.

Based on the comments and responses, Decision 2015/001/R was developed.

Applicability		Process map	
Affected regulations and decisions:	Regulation (EU) No 139/2014 ED Decision 2014/013/R CS ADR-DSN - Initial issue	Concept Paper:	No
Affected stakeholders:	Aerodrome operators, Competent Authorities	Terms of Reference:	10.4.2014
Driver/origin:	Necessary amendments in response to developments of new Taxiway separation distances, Table 3-1 of ICAO, Annex 14, Vol I – Aerodromes	Rulemaking group:	No
Reference:		RIA type:	None
		Technical consultation during NPA drafting:	No
		Duration of NPA consultation:	2 months
		Review group:	No
		Focussed consultation:	Yes
		Publication date of the Opinion:	
		Publication date of the Decision:	2014/Q4



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1. Procedural information

1.1 The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this Comment-Response Document (CRD) in line with Regulation (EC) No 216/2008¹ (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the Agency's [4-year Rulemaking Programme](#) under RMT.0591 — 'Maintaining aerodrome rules'.

The draft update of CS ADR-DSN.D.260 Taxiway minimum separation distance has been developed by the Agency, based on the input and developments of the ICAO Aerodrome Design Working Group (ADWG). All interested parties were consulted through NPA 2014-21³, which was published on 3 September 2014. In total, 37 comments were received from interested parties, including industry and national aviation authorities.

The text of this CRD has been developed by the Agency.

The process map on the title page contains the major milestones of this rulemaking activity.

1.2 The structure of this CRD and related documents

This CRD provides a summary of comments and responses as well as the full set of individual comments and responses thereto received to NPA 2014-21. The resulting rule text is provided in Chapter 3 of this CRD.

¹ Regulation (EC) No 216/2008 of the European Parliament and the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1),

² The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision concerning the procedure to be applied by the Agency for the issuing of Opinions, Certification Specifications and Guidance Material (Rulemaking Procedure), EASA MB Decision No 01-2012 of 13 March 2012.

³ See: <http://easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2014-21>



2. Summary of comments and responses

Commentators strongly and unanimously supported the proposal provided in the NPA. Comments led to further improvements in form of minor administrative changes to related CS and the creation of one new paragraph in GM, giving better clarity of the CS requirement.



3. Draft CS/GM

3.1 Proposed amendments

The text of the amendment is arranged to show deleted text, new or amended text as shown below:

- deleted text is marked with ~~strike through~~;
- new or amended text is highlighted in **grey**;
- an ellipsis (...) indicates that the remaining text is unchanged in front of or following the reflected amendment.

3.2 Draft Certification Specifications

Amend CS ADR-DSN.D.260 as follows:

CS ADR-DSN.D.260 Taxiway minimum separation distance

- The safety objective of minimum taxi separation distances is to allow safe use of taxiways and aircraft stand taxilanes taxi-lanes to prevent possible collision with other aeroplanes operating on adjacent runways or taxiways, or collision with adjacent objects.
- The separation distance between the centre line of a taxiway and the centre line of a runway, the centre line of a parallel taxiway or an object should not be less than the appropriate dimension specified in Table D-1.

Code letter	Distance between taxiway centre line and runway centre line (metres)								Taxiway centre line to taxiway centre line (metres)	Taxiway, other than aircraft stand taxilane, centre line to object (metres)	Aircraft stand taxilane centre line to aircraft stand taxilane centre line (metres)	Aircraft stand taxilane centre line to object (metres)
	Instrument runways Code number				Non-instrument runways Code number							
	1	2	3	4	1	2	3	4				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13) (12)
A	82.5	82.5	—	—	37.5	47.5	—	—	23 (23.75)	15.5 (16.25)	19.5	12
B	87	87	—	—	42	52	—	—	32 (33.5)	20 (21.5)	28.5	16.5
C	—	—	168	—	—	—	93	—	44	26	40.5	22.5 (24.5)
D	—	—	176	176	—	—	101	101	63 (66.5)	37 (40.5)	59.5	33.5 (36)
E	—	—	—	182.5	—	—	—	107.5	76 (80)	43.5 (47.5)	72.5	40 (42.5)



F	—	—	—	190		—	—	—	115	91 (97.5)	51 (57.5)	87.5	47.5 (50.5)
<p>Note 1.— The separation distances shown in columns (2) to (9) represent ordinary combinations of runways and taxiways.</p> <p>Note 2.— The distances in columns (2) to (9) do not guarantee sufficient clearance behind a holding aeroplane to permit the passing of another aeroplane on a parallel taxiway.</p>													

Table D-1. Taxiway minimum separation distances

Amend CS ADR-DSN.G.400(c) as follows:

CS ADR-DSN.G.400 Clearance distances on a de-icing/anti-icing pad

...

- (c) If the pad layout is such as to include bypass configuration, the minimum separation distances specified in Table D-1, column (13) ~~(12)~~ should be provided.

...

Amend GM1 ADR-DSN.D.260(d) as follows:

GM1 ADR-DSN.D.260 Taxiway minimum separation distance

...

- (d) The separation distance between the centre line of an aircraft stand taxilane and an object, as prescribed in Table D-1, column (13) ~~12~~, may need to be increased when jet exhaust wake velocity may cause hazardous conditions for ground servicing.

...

- (f) The separation distances, as prescribed in Table D-1, may have to be increased on taxiway curves to accommodate the wing sweep of the critical aeroplane or on dual parallel taxiways when, as for example, used as bypass taxiways.

Amend CS ADR-DSN.T.915 (b)(1) as follows:

CS ADR-DSN.T.915 Siting of equipment and installations on operational areas

...

- (b) Unless its function requires it to be there for air navigation or for aircraft safety purposes, no equipment or installation endangering an aircraft should be located:

- (1) on a runway strip, a runway end safety area, a taxiway strip, or within the following distances:

Code Letter	Distance between taxiway (to — Taxiway) , other than aircraft stand taxilane, centre line to object (metres)
A	15.5 (16.25)
B	20



	(21.5)
C	26
D	37 (40.5)
E	43.5 (47.5)
F	51 (57.5)

if it would endanger an aircraft, or ...



4. Individual comments and responses

In responding to comments, a standard terminology has been applied to attest the Agency's position. This terminology is as follows:

- (a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

CRD table of comments, responses and resulting text

(General Comments)		-
comment	5	comment by: <i>EUROCONTROL</i> The EUROCONTROL Agency does not have comments on NPA 2014 - 21.
response	Noted.	
comment	8	comment by: <i>DGAC Direction Générale de l'aviation civile</i> French DGAC agrees with the proposed amendment.
response	Noted.	
comment	9	comment by: <i>Swedish Transport Agency</i> Swedish CAA has no comments regarding the changes in NPA 2014-21.
response	Noted.	
comment	11	comment by: <i>CAA Norway</i> CAA-Norway do not have any comments to the changes in NPA 2014-21.
response	Noted.	
comment	13	comment by: <i>Zurich Airport</i> Zurich Airport (ZRH) strongly support the approach of EASA to adopt those positive changes as fast as possible.
response	Noted.	



comment	16	comment by: <i>Union des Aéroports français - UAF</i>
	<u>Commentaire de l'Union des Aéroports Français (UAF)</u>	
	L'UAF (Union des Aéroports Français) soutient les modifications des CS et GM relatives aux distances minimum de voies de circulation et demande une application immédiate. Ces modifications sont portées depuis plus de 10 ans par des exploitants d'aérodromes, des autorités de l'aviation civile et des constructeurs d'aéronefs qui sont impliqués dans des groupes de travail ad hoc. <u>Courtesy translation</u>	
	UAF (Union des Aéroports Français) strongly endorse CS and GM related to taxiway minimum separation distance modification, without implementation delay. The reduced distances adjustment is demonstrated for more than a decade by airport operators, Civil Aviation Authority's, and aircraft manufacturers involved in working ad hoc groups.	
response	Noted.	
comment	17	comment by: <i>Bristol Airport</i>
	Bristol Airport fully supports the proposed amendments set out in this NPA.	
response	Noted.	
comment	20	comment by: <i>Avinor AS</i>
	Avinor AS supports the proposed reductions of clearance requirements for taxiways and aircraft stand taxilanes. These figures have been thoroughly discussed by the ICAO Aerodrome Design Working Group (ADWG) over the last years, and their proposal is based on several scientific studies. Avinor AS welcomes this EASA initiative intended to facilitate the certification process and to avoid unnecessary, potentially significant increase in effort.	
response	Noted.	
comment	23	comment by: <i>London Luton Airport</i>
	LLAO supports the proposed changes in the NPA and can see the benefits of them being introduced without delay, as they will have a potential impact on both the forthcoming certification process and in any future development plans.	
response	Noted	
comment	24	comment by: <i>East Midlands Airport - EMA/EGNX</i>
	East Midlands Airport supports the EASA NPA to adopt revised Taxiway to Taxiway and Taxiway to Object clearances. There will be many benefits to efficiency and capacity from adopting these proposed new standards without a reduction in levels of safety.	
response	Noted.	



comment	25	comment by: AIRBUS
	Airbus fully supports this EASA initiative to anticipate the future ICAO requirements on minimum taxi separation distances.	
response	Noted.	
comment	31	comment by: FNAM (French Aviation Industry Federation)
	<p>FNAM (Fédération Nationale de l'Aviation Marchande) is the French National Professional Union / Trade Association for Air Transport, grouping as full-members:</p> <ul style="list-style-type: none"> • CSTA: French Airlines Professional Union (incl. Air France) • GIPAG: French General Aviation Operators Professional Union • SNEH: French Helicopters Operators Professional Union • CSAE: French Handling Operators Professional Union • GPMA: French Ground Operations Operators Professional Union • EBAA France: French Business Airlines Professional Union <p>And as associated member:</p> <ul style="list-style-type: none"> • UAF: French Airports Professional Union <p><u>Introduction</u></p> <p>The NPA 2014-21 introduces changes in comparison with:</p> <ul style="list-style-type: none"> - The Commission Regulation (EC) No 139/2014; - The Decision No 2014/013/R; - The Certification Specification and Guidance Material for Aerodromes Design CS-ADR-DSN initial issue <p>The comments hereafter shall be considered as an identification of some of the major issues the FNAM asks EASA to discuss with third-parties before any publication of the proposed regulation.</p> <p>In consequence, the comments hereafter shall not be considered:</p> <ul style="list-style-type: none"> - As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council; - As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it; - As exhaustive: the fact that some articles (or any part of them) are not commented does not mean FNAM has (or may have) no comments about them, neither FNAM accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation. <p><u>FNAM General Comments</u></p> <p>FNAM strongly endorse CS and GM related to taxiway minimum separation distance modification, without implementation delay. The reduced distances adjustment is supported by more than a decade of studies performed where airport operators, the NAAs, and the aircraft manufacturers are involved.</p> 	
response	Noted.	
comment	36	comment by: BAA Airside operations
	Attachment #1	



	<p>Heathrow Airport welcomes and supports the EASA proposal to amend the CS.ADR.DSN.D.260</p> <p>The ICAO Aerodromes Panel has supported the detailed work done by the ICAO Aerodrome Design Working Group after its completion of an extensive review of the taxiway deviations studies and safety cases that have been undertaken to deal with these clearances. Some benefits are detailed in the attached paper and these include;</p> <ul style="list-style-type: none"> - Improving airfield efficiency by increasing the taxi routes available to aircraft, - Enabling site constrained airports to safely accommodate larger aircraft, - Increasing flexibility for ATC in routeing aircraft on the ground, - Reduced airport footprint when constructing new facilities. <p>It is clearly worthwhile to achieve these benefits for European airports that are historically site constrained and that are having to continually deal with increasing numbers of new larger – and longer – aircraft.</p> <p>The timing of this proposal is right as European airports are just starting to commence the transition to the EASA 139 rules and this comes at a good time as this has only just begun. The amended CS will avoid potentially wasted work if ICAO later adopts these distances. It will prevent airports having to make decisions on how to deal with the historical infrastructure under the previous CS where in some cases it will comply with the new CS. Therefore the initiative shown by EASA is fully supported by Heathrow.</p>
response	Noted.
comment	<p>37 comment by: <i>FEDERAL AVIATION ADMINISTRATION</i></p> <p>Attachments #2 #3</p> <p>FAA</p>
response	<p>Comment No 1: Noted.</p> <p>The proposed values on reduction of separation distances are equal as proposed by the ICAO. The statistical data and reports that were submitted to support the proposal of reducing separation distances show similar probability risk based values of deviations for aircrafts, which allows reduction of minimum taxiway centre line separation distances and grouping them to 8 meters for code letters A to C, and 11 meters for code letters D to F.</p> <p>Comment Nos 2 & 3: Accepted.</p> <p>The text of the guidance material, GM1 ADR-DSN.D.260 will be updated with the new paragraph (f) as follows:</p> <p>(f) The separation distances, as prescribed in Table D-1, may have to be increased on taxiway curves to accommodate the wing sweep of the critical aeroplane or on dual parallel taxiways when, as for example, used as bypass taxiways.</p>
comment	<p>XX comment by: <i>LBA</i></p> <p>LBA would welcome the reduced clearances whilst maintaining safety parameters.</p>
response	Noted.



comment	12	comment by: <i>Bundesministerium für Verkehr und digitale Infrastruktur/ German Federal Ministry of Transport and Digital Infrastrucutre</i>
		The Proposed Amendment ist welcomed and strongly supported as extensive studies were conducted to obtain and validate these new separation distancies. EASAs practice to make use of available developments at the ICAO level (even though the proposed changes have not yet been incorporated into Annex 14) is greatly appreciated.
response		Noted.
comment	22	comment by: <i>Amsterdam Airport Schiphol - AMS/EHAM (and D.A.A)</i>
		Amsterdanm Airport fully supports this initiative to implement this ICAO Aerodrome Panel 3 proposal on taxiway seperations directly. In this way many European airports can benefit from this change directly and save an considerable amount of money. Since Amsterdam Airport Schiphol was more than 20 years directly involved in this study we don't have any comments on the NPA. See also attachement. Regards Dick Meerman
response		Noted.

EXECUTIVE SUMMARY

p. 1

comment	14	comment by: <i>Flughafen Berlin Brandenburg GmbH</i>
		We fully embrace the idea of a swift and evidence based regulation. Especially in the light of upcoming certification efforts and/or infrastructural projects the reduction of efforts (i.e. the need "to start all over again" in the field of separation distances) is more than welcome. Hence, we support the suggested amendments proposed within this NPA.
response		Noted.
comment	18	comment by: <i>Belgian Civil Aviation Authority</i>
		In general, the Belgian Civil Aviation Authority supports the proposed amendment 2014-21 and its adoption before ICAO adoption.
response		Noted.
comment	21	comment by: <i>Birmingham Airport Limited</i>
		Birmingham Airport Limited (BAL) is fully supportive of the proposed update to CS ADR_DSN.D.260 Taxiway minimum separation distance. The changes proposed will benefit Birmingham Airport by improving the capability of the existing taxiway, taxilane and apron areas and by conferring greater efficiency upon new taxiway, taxilane and apron infrastructure. BAL urges the adoption of these proposed changes at the earliest opportunity.



response Noted.

2. Explanatory Note

p. 4-5

comment 3 comment by: *Jan Loncke*
 Comment on 2.1 .
 We do welcome and appreciate this 'anticipational approach' of the Agency !

response Noted.

comment 6 comment by: *Brussels Airport*
 Comment 2.1
 This anticipated approach by EASA is very much appreciated because the reduced separation distances solve, especially at Brussels Airport, an existing non-compliance and help a lot for future developments.

response Noted.

comment 32 comment by: *UK CAA*
Page No: 4-6
Paragraph No: 2.1, 3.1 and table D-1; CS ADR-DSN.D.260 Taxiway minimum separation distance
Comment:
 The revised separations are based on 3 proven methodologies:

- taxiway centreline deviation studies performed at several international airports involving over 400,000 movements,
- the methodology adopted by the European Aerodrome Operations Planning Group (AOPG), formalized as ICAO Document 7754 to support entry into service of the B747-400, and
- a risk-based assessment methodology that concluded that the lower centre line separations proposed by the ADWG could achieve a target level of safety (TLS) between $1e10^{-7}$ and $1e10^{-8}$, which is equivalent to or better than the ICAO global risk factor.

 The UK CAA is a member of the ICAO Aerodrome Design Working Group and supported the revised separations at the ICAO Aerodromes Panel. Consequently, the UK CAA supports the introduction of the revised taxiway separation distances.

response Noted.

3. Proposed amendments — 3.1. Draft Certification Specifications (Draft EASA Decision)

p. 6

comment 4 comment by: *ADV - German Airports Association*
 ADV strongly supports the proposed amendments to CS ADR-DSN.D.260 and its GM1, CS ADR-DSN.G.400 and CS ADR-DSN.T.915.



response Noted.

comment 35 comment by: Flughafen Düsseldorf GmbH

Die Anpassung der Mindestabstände zwischen Rollbahnen bzw. zwischen Rollbahnen und Objekten sowie zwischen Standplatzrollgassen und Objekten führt zu einer besseren Flächenverfügbarkeit und im günstigsten Fall zu einem größeren Angebot von Abstellpositionen. Des Weiteren können Verbesserungen für die Bodenverkehrsdienste geschaffen und das Rollkonzept optimiert werden.

response Noted.

**3. Proposed amendments — 3.1. Draft Certification Specifications (Draft EASA Decision) — CS
ADR-DSN.D.260 Taxiway minimum separation distance**

p. 6-7

comment 2 comment by: Jan Loncke

An editorial shortcoming in the NPA text under paragraph 3.1 on CS.ADR-DSN.D.260 (a). I believe that the highlighting in grey has been forgotten in this sentence. Considering the way proposed amendments are highlighted, as is described in 3., I believe the words "aircraft stand taxilanes" should have been highlighted in the NPA.

CS ADR-DSN.D.260 Taxiway minimum separation distance

(a) The safety objective of minimum taxi separation distances is to allow safe use of taxiways and aircraft stand taxilanes ~~taxi lanes~~ to prevent possible collision with other aeroplanes operating on adjacent runways or taxiways, or collision with adjacent objects.

response Accepted.
The amending text will be highlighted in grey.

comment 10 comment by: Aena Aeroportos, S.A.

Table 1-4 from ICAO Doc 9157, *Aerodrome Design Manual, Part 2, Taxiways, Aprons and Holding Bays* should be updated taking into account the new separation distances from **CS ADR-DSN.D.260 Taxiway minimum separation distance**

Once this table is updated, a reference to it should be included in GM1 ADR-DSN.D.260 Taxiway minimum separation distance

response Not accepted.

The Table 1-4 from ICAO Doc 9157, Part 2, Taxiways, Aprons and Holding Bays is not part of the current CS book and was not part of the current ICAO ADWG proposal at the AP3 concerning update of the taxiway minimum separation distances. The NPA 2014-21 refers to the updates of the table D-1 and corresponding existing CS text. The Agency will take into account proposed changes of Table 1-4 and possible involvement in the GM text in line with ICAO.

comment 27 comment by: Glasgow Prestwick Airport

we agree to the ammended tables We would also propose the addition of pictorial diagrames to give further clarity



response Noted for the first comment. Not accepted for the second comment. The Agency believes that the figures from the CS/GM and ICAO material currently provide enough clarity. However, during the next phases of the aerodrome rules maintaining will again consider the proposal of adding figures for better overview.

comment 28 comment by: Aberdeen Airport Airside Operations
 Very happy with the changes to the distances within this table, in line with the ICAO standard. We do however have an existing problem with some of the aircraft/pilots that operate on our airport on our Code C taxiway and Code D Taxilane, who can infringe the adjacent roadway with their wings on turn out, although I appreciate that we can maintain existing distances, this may increase our issue if we reduce distances to be in line with the standard . This is a particular issue as we are a straight push back airport.

response Noted. The explanation of ‘existing problem’ is of operational nature.

comment 34 comment by: Federal Office of Civil Aviation FOCA

Article / Table	Comments / Proposals																																				
CS ADR-DSN.D.260 / Table D-1	<p><i>The proposed separation distances on taxiways and aircraft stand taxilanes for aircraft with a code letter A to C are equal (8 resp. 4.5m) even though a code letter A aircraft does have different taxi characteristics which are not comparable to a code letter C aircraft. Therefore, FOCA suggests to use the already existing classification of code letter A to F in a more sophisticated way and to reduce the separation distance for code letter A and B aircraft to 6.0 resp. 3.0 m. The separation distances on aircraft stand taxilanes shall be in accordance with the already defined and published clearance distances in CS ADR-DSN.E.365.</i></p> <p><i>In FOCA's opinion the now proposed separation distances for code letter A and B aircraft do not significantly reduce the safety on taxiways and aircraft stand taxilanes.</i></p> <p><i>Proposed wingtip-to-wingtip/object separation distances:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Code letter</th> <th style="text-align: center;">Taxiway to object separation distance [meters]</th> <th style="text-align: center;">Aircraft stand taxilane to object separation distance [meters]</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">A</td> <td style="text-align: center;">6.0 8.0</td> <td style="text-align: center;">3.0 4.5</td> </tr> <tr> <td style="text-align: center;">B</td> <td style="text-align: center;">6.0 8.0</td> <td style="text-align: center;">3.0 4.5</td> </tr> <tr> <td style="text-align: center;">C</td> <td style="text-align: center;">8.0</td> <td style="text-align: center;">4.5</td> </tr> <tr> <td style="text-align: center;">D</td> <td style="text-align: center;">11.0</td> <td style="text-align: center;">7.5</td> </tr> <tr> <td style="text-align: center;">E</td> <td style="text-align: center;">11.0</td> <td style="text-align: center;">7.5</td> </tr> <tr> <td style="text-align: center;">F</td> <td style="text-align: center;">11.0</td> <td style="text-align: center;">7.5</td> </tr> </tbody> </table> <p><i>Proposed amendment of Table D-1:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Code letter</th> <th style="text-align: center;">...</th> <th style="text-align: center;">...</th> <th style="text-align: center;">...</th> <th style="text-align: center;">...</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">(1)</td> <td style="text-align: center;">...</td> <td style="text-align: center;">(10)</td> <td style="text-align: center;">(11)</td> <td style="text-align: center;">(12) (13)</td> </tr> <tr> <td style="text-align: center;">A</td> <td style="text-align: center;">...</td> <td style="text-align: center;">21 23</td> <td style="text-align: center;">13.5 15.5</td> <td style="text-align: center;">18 19.5 10.5 12</td> </tr> </tbody> </table>	Code letter	Taxiway to object separation distance [meters]	Aircraft stand taxilane to object separation distance [meters]	A	6.0 8.0	3.0 4.5	B	6.0 8.0	3.0 4.5	C	8.0	4.5	D	11.0	7.5	E	11.0	7.5	F	11.0	7.5	Code letter	(1)	...	(10)	(11)	(12) (13)	A	...	21 23	13.5 15.5	18 19.5 10.5 12
Code letter	Taxiway to object separation distance [meters]	Aircraft stand taxilane to object separation distance [meters]																																			
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D	11.0	7.5																																			
E	11.0	7.5																																			
F	11.0	7.5																																			
Code letter																																	
(1)	...	(10)	(11)	(12) (13)																																	
A	...	21 23	13.5 15.5	18 19.5 10.5 12																																	



	B	...	30 32	18 20	27 28.5	15 16.5
	C	...	44	26	40.5	22.5
	D	...	63	37	59.5	33.5
	E	...	76	43.5	72.5	40
	F	...	91	51	87.5	47.5
CS ADR- DSN.T.915	<i>Proposed amendment of the table in CS ADR-DSN.T.915:</i>					
	Code letter	<i>Distance between taxiway, other than aircraft stand taxilane centre line to objects [meters]</i>				
	A	13.5 15.5				
	B	18 20				
	C	26				
	D	37				
	E	43.5				
	F	51				

response

Not accepted.

The proposed values on reduction of separation distances are equal as proposed by ICAO. The statistical data and reports that were submitted to support the proposal of reducing separation distances show similar probability risk based values of deviations for aircrafts, which allows reduction of minimum taxiway centre line separation distances and grouping them to 8 meters for code letters A to C, and 11 meters for code letters D to F.

3. Proposed amendments — 3.1. Draft Certification Specifications (Draft EASA Decision) — GM1 ADR-DSN.D.260 Taxiway minimum separation distance

p. 7

comment

29

comment by: *Aberdeen Airport Airside Operations*

we are happy with this statement, this is in place at the moment

response

Noted.

3. Proposed amendments — 3.1. Draft Certification Specifications (Draft EASA Decision) — CS ADR-DSN.T.915 Siting of equipment and installations on operational areas

p. 7-8

comment

1

comment by: *Jan Loncke*

Please add a **comma** in the text in the first row, second column of the table to avoid misinterpretation.

"Distance between taxiway, other than aircraft stand taxilane, centre line to object (metres)."



response	Accepted.
comment	7 comment by: <i>Brussels Airport</i> Please add a comma in the text in the first row, second column of the table to avoid misinterpretation. "Distance between taxiway, other than aircraft stand taxilane, centre line to object (metres)."
response	Accepted.
comment	19 comment by: <i>Belgian Civil Aviation Authority</i> A comma should be added between the words "taxilane" and "centre" in the table title (first row, second column) to avoid misinterpretation: "Distance between taxiway, other than aircraft stand taxilane, centre line to object (metres)."
response	Accepted.
comment	30 comment by: <i>Aberdeen Airport Airside Operations</i> AIA are happy with this statement
response	Noted.
comment	33 comment by: <i>UK CAA</i> Page No: 7 Paragraph No: Table at bottom of page 7 Comment: Consider removing table CS ADR-DSN.T.915 'Siting of equipment and installations on operational areas'. Justification: The revised dimensions are already included in the new table D-1 so the table on page 7 is repetition.
response	Not accepted. The particular table is part of CS T.915, paragraph (b)(1) which refers to the areas and distances where 'no equipment or installation endangering an aircraft should be located'. From transparency and readability point of view the text with the table give a better overview of the requirement.

4. Regulatory Impact Assessment (RIA)

p. 9

comment	15 comment by: <i>Flughafen Berlin Brandenburg GmbH</i> We wholeheartedly agree on the fact that a RIA is not required in this special case. However, the wording might be misleading: A RIA should be developed if additional requirements (of CS/GM material) are created and/or existing requirements (of CS/GM material) are tightened.
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response Noted.

5. References

p. 10

comment 26 comment by: *Glasgow Prestwick Airport*
We agree with a ammendment proposed

response Noted.



5. Appendix A - Attachments

 [EASA \(NPA 2014-21\) v4.pdf](#)
Attachment #1 to comment [#36](#)

[NPA 2014-21 'Draft CS ADR-DSN D 260'.pdf](#)

