

## Comment Response Document

### NPA 22B-31

#### **Commentators**

Comments were received from the following:

Austro Control	Slingsby Aviation
CAA Monaco	SLV Denmark
DGAC France	Mr B Touret
DGA Cyprus	Transport Canada
FOCA	UK CAA
RLD	

#### **Discussion of Comments**

Ten of the 11 commentators agreed with the NPA, four of these commentators offering suggested amendments to the text of the NPA.

One commentator suggested additional text for proposed 22.207(d) to read "*The onset of the stall is clearly perceptible to the pilot*". It is agreed that it is important that the pilot can still recognise the point of stalling. This is covered, however, because the proposals address only exemption from stall warning; the requirement that the stall be clearly identified remains (22.201(a)).

Another commentator suggested that the opening sentence of 22.207(d) needs clarification and proposed the following text changed (in italics):

"Compliance with 22.207(a) through (c) may not be required for a sailplane, a self-launching sailplane with the engine stopped or a self-sustaining powered sailplane *with the engine stopped or running* if the following are met *with air brakes, wing flaps and landing gear in any normal position*:"

These changes are accepted and the proposal is amended accordingly. A further editorial comment to the first sentence of 207(d) from another commentator has been accommodated by the above clarification.

One commentator suggested that the list of applicable types in 207(d) is redundant since unmarked requirements in JAR 22 applied to all types of sailplane. However, 207(d) is written in this manner to make it clear that the exemption is not applicable to a self-launching powered sailplane (SLPS) with the engine running.

One commentator suggested that the exemption from stall warning should not be granted to a self-sustaining powered sailplane (SSPS) with the engine running due to the possibility of a pilot using the engine at low altitude. However, as an SSPS is not going to be used for circuit work (unlike a SLPS) use of the engine at low altitude would be unusual. The proposals are therefore not amended in this respect.

One commentator disagreed with the proposed change to 22.207(d) in that it would allow two different stall warnings for an SLPS i.e. stall warning meeting the requirements of 22.207(a)-(c) with the engine running and possibly little or no stall warning with the engine stopped. The use of different stall warnings, depending on configuration, would not normally be acceptable for a conventional aeroplane but it is considered that a pilot using the soaring capability of a SLPS would be aware of the proximity to the stall by means of other cues inherent in this type of flying. The comment is therefore not accepted.

Minor editorial corrections have been made to the proposals.