

**NPA 21-31****COMMENT- RESPONSE DOCUMENT****1. Background**

NPA 21-31 was circulated by letter of the Regulation Director dated 2 January 2002. Eleven comments were received during the comment period.

**2. Review of comments****2.1 Table of comments**

NUMBER	COMMENTER	COMMENT
1	Martinair Holland	Accept
2	SLV, Denmark	Accept
3	Transport Canada	Accept
4	LBA, Germany	Accept
5	BAe Systems, UK	No comments
6	CAA, Hungary	Agree
7	CAA, UK	No comments
8	ACG, Austria	Supported
9	AECMA	Agree & general comment
10	Rolls-Royce plc.	Support & general comment
11	DGAC-France	No comments

**2.2 Summary of comments**

All the commenters supported the proposal or expressed their lack of comments.

One of them (AECMA) added a general comment on the way to develop the changes to the ACJ material during the delay period. AECMA also added a remark on the ToR of the ad-hoc group created to accomplish this task in the sense that the rule itself and not only the ACJ should have been part of the task.

Other commenter (Rolls-Royce plc.) also added a general comment recognising the effort made to clarify the rule by the ACJ, but expressed concerns about the potential different interpretations by different NAA's and suggesting that the problem lies with the rule itself.

These two general comments are beyond the scope of the NPA and similar comments have been considered already by the CST at its meeting of 17 January 2002.

No adverse comment was received.