

Comment Response Document for NPA 22G-87

For the NPA-22G-87 comments have been received from:

- SLV, Denmark
- DGAC, France
- LFV, Sweden
- CAA, UK
- LBA, Germany

Three Authorities (SLV, DGAC France, LFV Sweden) agreed with the NPA as it was proposed by ENAC.

Two Authorities (CAA UK and LBA Germany) proposed a different text that, to some extent, was also based on a different approach, with respect to the original ENAC proposal.

LBA Germany Comments

They proposed that:

i) Maximum and minimum cockpit load

should be replaced with:

i) **actual** maximum and minimum cockpit load **in relation to the individual empty weight equipped**

Bold faced text identifies the differences with respect to the original proposal. The LBA advised that an ACJ should be also added to define what the word 'actual' means.

The opinion of the Group is that the information relevant to the empty weight of any single sailplane/powered sailplane is given in the Flight Manual together with the location of the associated CG. The purpose of the placard required by the French National Variant was not to divert the pilot from reading this information but just to give him a simple and usable piece of information to avoid gross mistakes in the calculation of the weight and balance .

Most of the sailplanes/powered sailplanes are already provided with a placard based on this concept and no adverse experience has been reported so far from the field. Therefore no need was envisaged for introducing a different approach that would require the actual maximum and minimum weight to be provided in the cockpit.

It was also felt by the Group that the introduction of operational requirements (like the time interval between two weight and balance checks, required by the proposed ACJ) into the Airworthiness Code would be inappropriate.

Based on these considerations LBA comment was rejected.

CAA UK Comments

CAA UK proposed a different text for the new subparagraph (h) of JAR 22.1557. In particular they proposed to change:

i) Maximum weight

ii) Maximum and minimum cockpit load

with:

i) Maximum **take off** weight

ii) Maximum and minimum cockpit **weight**

Again bold faced text identifies changes with respect to the original proposal.

As far as the change to subparagraph i) is concerned, the Group had already discussed advantages and disadvantages of this approach in the early stage of the NPA.

The conclusion of this discussion was that, although the word „maximum take off weight“ would be more understandable to the pilot, its introduction would be contrary to the basic „philosophy“ used in JAR 22. As a matter of fact, in this code the assumption is made that the maximum take off weight is not different from the maximum landing weight and therefore only the definition of maximum weight is required. Current technology does not allow quick dumping of water ballast or, in case of a powered sailplane, of the fuel in order to make it possible , after an emergency during the take off or early aero towing phases, to land with a weight less than the take off weight.

On these grounds the first part of CAA comment has been rejected by the Group.

As for the second comment, this has been accepted by the Group in that the term weight is consistent with the wording of the previous subparagraph i).