

NPA OPS-14 COMMENTS - RESPONSE DOCUMENT

No	Commentator	Country	Paragraph	Comment	Result
1	FR Aviation	UK	All	Agreed	Noted
2	Touret	France	Weight	Inconsistent with A-NPA for SEIMC ETOPS for cargo <100000lbs Helicopters exposure during T/O and landing. RAP involvement.	The JAAC has already agreed that there should be a discriminant of 45360 kg, which is contained in JAR OPS 1 below which IL 20 in its entirety should not apply. The reliability issue is addressed in JAR 21.3
3	Transport Canada	Canada	All	No comment	Noted
4	Dornier	Germany	APU	Statement on APU capability and reliability could lead to unnecessary testing and reliability demonstrations. Revise text to be 'The APU, if required for extended range operations, should be Certificated as an essential APU and should meet the applicable JAR 25 provisions (Subpart J-APU parts A and B, or equivalent.	Agreed, the proposed text says more succinctly what was intended.
5g	IAOPA	Germany	All	General comment on burden to small Aerial Work operators.	The intention was precisely to reduce the administrative burden, and the majority opinion is that the AMC does allow these operations to continue.
6	IAOPA	Germany	All	Agreed	Noted
7	SNECMA	France	All	Not support the way 19 pax against 20 pax are treated. Full ETOPS should be applied.	The JAAC has already agreed that there should be a discriminant of 45360 kg and 19 seats, which is contained in JAR OPS 1, below which IL 20 in its entirety should not apply.
8	RAP Kluth	??	All	Text change: Delete ..'or if approved by the authority 180 minutes for turbojet aeroplanes. ..'see AMC OPS 1.245(a)(2) If the extension to 180 minutes is Authority approved, the aeroplane becomes an ETOPS	This is a non-ETOPS operation. The approval will be based on the non-ETOPS requirements set out in the AMC.
9	Gulfstream	USA	All	Accept	Noted

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10.1	Swiss air ambulance	Swiss	All	No additional rules until harmonised with USA & Canada.	This is an active harmonisation issue.
10.2	Swiss air ambulance	Swiss	All	Air ambulance not to be included in these more restrictive requirements	Ambulance flights are Commercial Air Transportation and are subject to JAR-OPS 1
10.3	Swiss air ambulance	Swiss	All	Straight to 180 not 120.	120 minutes is a reasonable starting point. Extension to 180 by application of requirements that are not penalising should be considered
11	SKYJET	Switzerland	All	Agreed	Noted
12	SKYJET	Switzerland	All	Agreed	Noted
12.1				Suggests changes to the fuel planning requirements	Fuel requirements for holding, standard approach, missed approach and landing are basic planning requirements in JARs, and are therefore applicable to this operation.
13	CAA Finland	Finland	All	Agreed	Noted
14	Dunlop Aviation	UK	All	Agreed	Noted
15	Bristol Myers	UK	All	Accepted.	Noted
16	BMW RR	Germany	All	Accepted	Noted
17	K Services Inc.	USA	All	Accepted	Noted
18	Elite Aviation	USA	All	Accepted	Noted
19	GAMTA	UK	All	Agreed	Noted
20	GAMTA	UK	All	Agreed. Is against establishment of a specific IFSD	Noted
21	GAMTA	UK	Distances	USA does not apply restrictions on 'on demand' commercial operations, if this was applicable to JAR operators, 1.245(a)(2) would not be needed.	Disagree. The USA does impose restrictions, see comment 61. Some form of control is required for commercial operations.

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22	GAMTA	UK	1.245(a)(2)(ii)	Revised text.....'the distance flown in 120 minutes, or beyond if approved by the Authority....	Disagree. Paragraph 1 is merely introductory to the AMC as a whole, the requirement is stated in JAR OPS 1.245(a)(2)
23	GAMTA	UK	All	Revise text to enable operations beyond 180 minutes.	Disagree. There is no intention to increase the threshold beyond 180 minutes at this time. To do so would require a further NPA.
24	GAMTA	UK	1.245	General comment. Determination of speed can penalise a high speed A/C at lower weights.	Disagree, To prevent inappropriate variation in EROPS thresholds between States, a single speed is needed.
25	Cessna	USA	All	Accepted	Noted
26	Cessna	USA	All	IFSD is difficult to determine, DGAC stance will create problems	Agreed. Past experience justifies continued operation.
27	Cessna	USA	All	Main text needs to be rewritten to enable operations beyond 180 minutes	Disagree. There is no intention to increase the threshold beyond 180 minutes at this time. To do so would require a further NPA.
28	Cessna	USA	All	It is inappropriate to specify certification standard JAR 25 in the AMC this should refer to JAR 1.1001	Disagree, it is necessary to specify the standard, and JAR 25 or equivalent is appropriate
29	Cessna	USA	All	AMC should not contain JAR E which are requirements for engine certification only. The final sentence 'Due account.....is neither advisory or helpful.	Agree, amend text to ' ...JAR 25 and JAR E...their equivalents ', and delete last sentence referring to reliability data
30	Cessna	USA	AMC 2c APU	JAR-25 already specifies the certification requirements for APUs and the AMC is not an appropriate place to repeat them.	Disagree, it is necessary to specify the standard, and JAR 25 or equivalent is appropriate
31	Cessna	USA	AMC 5a MEL	MEL. The term 'all relevant items' is not helpful. Suggest wording to be 'The MEL should take into account all items specified by the manufacturer.....'	Agreed.
32	Cessna	USA	All	Accept	Noted
33	Cessna	USA	All	Accept	Noted.
34	Urenco	Holland	All	Accept	Noted

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No	Commentator	Country	Paragraph	Comment	Result
35	RR	UK	AMC 1.245	The upper limit on area of operation is limited to 180 minutes. There should not be an upper limit.	Disagree. There is no intention to increase the threshold beyond 180 minutes at this time. To do so would require a further NPA.
35.1	RR	UK	AMC 1.245	Delete sentences “ Aeroplanes should be certificated to JAR-125..... “The aeroplane power unit should....system operation. “The APU.....should meet the applicable JAR-25 provisions (Subpart J-APU) or equivalent.	Disagree, it is necessary to specify the standard, and JAR 25 or equivalent is appropriate
	RR	UK	AMC 1.245	Supports harmonisation and absence of specific IFSD	Noted
36	IBAC	Canada	All	Accepted	Noted
37	IBAC	Canada	All	Accepted	Noted
38	AVCAM	Switzerland	All	Agreed and accepted	Noted
39	G5 Executive	Switzerland	All	Accepted	Noted
40	Travel Air	USA	All	Accepted	Noted
41	Rabbit Air	Switzerland	All	Accepted	Noted
42	CAA Denmark	Denmark	All	Accepted	Noted
43	MC Group	USA	All	Accepted	Noted
44	Czech Republic	Czech	All	Agreed	Noted
45	Bombardier	Canada	JAR 1.245	Weight discriminant should be raised to 56,000 kg	Future NPA may make this available; there are no small commercial aircraft currently over this weight discriminant.
45.1	Bombardier	Canada	JAR 1.245	The upper limit on area of operation is limited to 180 minutes.	Disagree. There is no intention to increase the threshold beyond 180 minutes at this time. To do so would require a further NPA.

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45.2	Bombardier	Canada	JAR 1.245	Speed for the determination of 'operational area' needs to be addressed.	
46	Bombardier	Canada	Weight	Increase weight to 56700	Future NPA may make this available; there are no small commercial aircraft currently over this weight discriminant
47	Bombardier	Canada	beyond 180+	Extend Threshold beyond 180 minutes	Disagree. There is no intention to increase the threshold beyond 180 minutes at this time. To do so would require a further NPA.
47.1	Bombardier	Canada	Area of operation	Allow operations beyond 180 minutes with Authority approval.	Partly agree, amend AMC para 5 e - Ensuring that en-route alternate aerodromes are available for the intended route, within 180 minutes based upon the one-engine inoperative cruise speed, which is a speed within the certificated limits of the aeroplane, selected by the operator and approved by the regulatory authority This parallels the procedure adopted in IL 20.
48	Bombardier	Canada	AMC1.245(a)	Issue of greater than 180 minutes. Text should be modified to 'Operations of non-ETOPS compliant twin turbo jet aeroplanes more than 120 minutes from an adequate aerodrome.	See above
49	Bombardier	Canada	180+	Comment again on operations beyond 180 minutes	See above
50	Bombardier	Canada	Note para 1	Accepted	Noted, see comment 67 below for change to the note
51	Bombardier	Canada	Para 2a	Delete 'Due account should be taken of the data reflecting in-service reliability of the propulsion system where available.	Agree
52	Bombardier	Canada	paras 3 & 4	Accepted	Agreed
53	Bombardier	Canada	para 5(e)	In order to address the allowance for 180 minutes +	Agreed, see comment 47.1
53.1	Bombardier	Canada	para 5(e)	Suggests new table as subject aircraft not capable of Cat 2/3	Disagree. This applies to non Cat 2/3 EOTPS aircraft too.
54	Bombardier	Canada	Weight	45360 has been adopted, was this value accepted without difficulty.	Acceptance was generally agreed. Comments were received in favour of both higher and lower limits
55	Bombardier	Canada	All	Some member states do not have time limit for	Disagree. All member states will be expected to comply

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				diversion, NPA 14 will restrict their operations.	with JAR-OPS when it becomes EU law.
56	Bombardier	Canada	Weight	Support for inclusion of 43560 against the French proposal for 5700. New mass was included 3 years ago.	Noted
57	Bombardier	Canada	All	Harmonisation is a key issue and should be ensured	Noted. Harmonisation has been a primary concern and is being actively pursued.
58	Bombardier	Canada	All	General comment	Noted
59	IPECO	UK	All	Accepted	Noted
60	Raytheon	USA	All	Historically 'Corporate operations' have been operating with no adverse effects. ETOPS requirements should not be imposed.	Disagree. The requirements are not intended to be applied to 'corporate operations' but to JAR-OPS 1 Commercial Air Transport operations, but in any case, they are not 'ETOPS' requirements.
61	FAA	USA	All	Accepted	Noted
62	GAMA	USA	All	AMC acceptable	Noted
63	GAMA	USA	para 2a	Change last sentence 'Due account should be taken of data reflecting in-service reliability..... to read 'Operators will promptly report all in-flight shutdown events to the Authority and engine and airframe manufacturer.'	Agreed partly but not deleting sentence entirely, as reporting requirements will be covered in a new JAR on occurrence reporting.
64	GAMA	USA	Discriminants	Weight discriminants should be increased in future.	The issue of higher weights needs to be discussed but should be available in the future with a new NPA.
65	GAMA	USA	All	Harmonisation	Noted
66	GAMA	USA	AMC para 1	Different text; Add phrase 'unless approved by the Authority' to the end of the sentence... 'the one engine inoperative cruise speed calculated in accordance with JAR-OPS 1.245(b), unless approved by the Authority.	Agreed The existing text has been replaced with.....Ensuring that en-route alternate aerodromes are available for the intended route, within 180 minutes based upon the one-engine inoperative cruise speed, which is a speed within the certificated limits of the aeroplane, selected by the operator and approved by the regulatory authority,.....

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67	CAA	UK	AMC para 1 note	Delete note 'mention of...Airworthiness Directive'. National Authorities issue A/Ds, this note could be interpreted as requesting N/As to assess Business Jets design and capabilities which is not the aim of the AMC.	Agreed. Reference to Airworthiness Directive has been deleted.
68	CAA	UK	AMC para 1	Add paragraph to AMC to require an N/A approval to carry out extended range operations.	Approval is exercised by the Authority through the Ops Spec in the AOC.
69	CAA	UK	AMC para 1	Modify last sentence	Agreed
70	CAA	UK	All	Agreed. Justification for introduction at 120 minutes	The issue has a long history which is related in the notes of the JAA OC.
71	CAA	UK	All	No requirements to cover IFSD rates for ETOPS approval	Noted The relevant occurrence reporting is to be addressed in a new JAR.
72	CAA	UK	para 3 c	As Above	As Above
73	CAA	UK	para 3 d	To allow operator experience to be shared, amend para 3 to read...'Individual engine in-flight shutdown events and world fleet experience should be used by the engine and airframe manufacturers to formulate appropriate corrective maintenance actions.	Partly Agreed The requirements for reporting of Failures, malfunctions and defects is covered in JAR 21.3, a reworded paragraph to refer to this JAR is added.
74	CAA	UK	120 minutes	Agreed.	Noted
75	CAA	UK	Para 3 1.245(a)(2) 4j	Editorial; add 'be' to read 'These checks should 'be' conducted Editorial; add 'up to' to read 'The distance flown in 120 minutes or if approved by the Authority, up to 180 minutes for turbo-jet aeroplanes. A definition of Approved One Engine Inoperative Cruise Speed should be included.	Agreed Agreed Agreed in relation to distance from en route alternate, see comment 53 not threshold
76	EBAA	Belgium	All except note	Agreed	Agreed
77	EBAA	Belgium	IFSD	General comment supporting difficulty in producing data for IFSD rates.	Agreed
78	EBAA	Belgium	All	Agreed	Agreed
79	EBAA	Belgium	para 2 a	Last line should be deleted. Explanatory note	Agreed, See comment ... above

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				recognises the issues.	
80	Hamilton Jet	Bermuda	All	Agreed	Agreed
81	NBAA	USA	All	Agreed	Agreed
82	??	??	paras 1..2a..5b	General comment on certification date and grandfather rights..... all other sections agreed	Agreed
83	BALPA	UK	AMC 1.245	Complex changes to the AMC to include dates for applicability of the AMC and JAR, + others.	It is normal for operational NPAs of this type not to set compliance dates, These are subject to the agreement of the Authority
84	BALPA	UK	Weight	Comment on the difficulties in introducing 43560	Disagree. There is no intention to increase the threshold beyond 180 minutes at this time. To do so would require a further NPA.
85	BALPA	UK	120 minutes	Did not like the proposal for 120 minutes	Agreed. As this is current UK legislation BALPA accents the position.
86	BALPA	UK	Safety record	Collation of data for reliability is difficult, put a system in place.	Agreed. The reliability issue is addressed in JAR 21.3.
87	BALPA	UK	IFSD	There may not be mandatory reporting of IFSDs, formulate laws to enforce this.	IFSD is addressed in a different form. See para 3, Powerplant Events and corrective action
88	BALPA	UK	IFSD	Call for accurate IFSD rates.	The reliability issue is addressed in JAR 21.3.
89	BALPA	UK	5(4) training	Flight Crew Training remains inadequate.	Agree a reference to subpart N has been added.
90	Honeywell	USA	All	Agreed	Agreed
91	TERMA	Denmark	All	Agreed	Agreed
92	Jet Management	USA	All	Agreed	Agreed
93	Seaflight	Greece	All	Agreed	Agreed
94	IMS Health	USA	All	Agreed	Agreed
95	Owens Aircraft	USA	All	Agreed	Agreed
96	Austrocontrol	Austria	Weight	43560kg Incompatibility with IL 20	The latest version of IL 20 has been amended to include 45360 replacing 5700.
97	Austrocontrol	Austria	Comment on DGAC(F) proposals	DGAC proposal for MTOM discriminant will be in line with ACG comment if IL 20 applicability remains unchanged.	Noted, but see response to No. 96.

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98	Austrocontrol	Austria	Comment	ICAO Annex 6 4.7, Attachment E and Airworthiness Technical Manual and Doc 9051 airworthiness	This is a statement of fact and is agreed
100	Austrocontrol	Austria	All	Exceeding 120 minutes, IL20 procedures should be used until IL20 applicability is changed	This operation is designated 'Non-ETOPS' and therefore IL20 does not apply
101	Austrocontrol	Austria	AMC 1.245(a) (2)	Delete first and second sentence.	The text in the AMC is necessary as this is section two material may be affected by the introduction of EU OPS
101.1	Austrocontrol	Austria	AMC 1.245(a) (2)	Change text after third sentence to read In order for operations up to 120 minutes to be approved..	Disagree. It is the intention of the AMC to enable diversion times beyond 120 and up to 180 minutes. The AMC can be considered as a non-ETOPS version of IL 20. This in not intended to be an ETOPS operation.
101.2	Austrocontrol	Austria	AMC 1.245(a) (2)	Add after last sentence In order for operations between 120 and 180 minutes to be approved, IL20 should be used.	Disagree. It is the intention of the AMC to enable diversion times beyond 120 and up to 180 minutes. The AMC can be considered as a non-ETOPS version of IL 20. This in not intended to be an ETOPS operation.
101.3	Austrocontrol	Austria	AMC 1.245(a) (2)	Note, third line after operation change text operation up to 120....	See above
101.4	Austrocontrol	Austria	AMC 1.245(a) (2)	Add the following text For operation beyond 120 minutes compliance with IL20 has to be shown.	See above
102	Austrocontrol	Austria	All	General comment and suggest text change to 1.245 (a)(2) to read ...'the distance flown in 120 or 180 minutes for turbo jet aeroplanes if approved by the Authority.	This is not an IL20 issue.
103	GESTAIR	Spain	All	Agreed	Agreed
105	VIAD Corp	USA	All	Agreed	Agreed
107	DGAC	France	1.245	Propose reduction of base limit from 120 to 60 minutes	Disagree. 120 min threshold was agreed by consensus in the full OC. DGAC position was acknowledged in Para 9.a of the Explanatory Text of the NPA
108	DGAC	France		IFSD	IFSD is addressed as far as practicable in the new para 3
109	DGAC	France	para 2 c	Delete....'if required for extended range operations (see sub para 2.b above)	Disagree, it is necessary to specify the standard, and JAR 25 or equivalent is appropriate
110	DGAC	France	para 5 e	Despatch/Flight planning requirements. See	The text of this paragraph has been changed see 47.1

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				proposed text	above. The table is included in the AMC and is annotated 'Planning minima'.
111	DGAC	France	1.245	Include auto-pilot and weather radar in text of requirements	Disagree. IL 20 only requires consideration of a single failure in this context, this appendix is a double failure requirement
112	Airbus	France	Weight	Revert to 5700kgs instead of 43560	Acceptance of 43560kg was generally agreed. Comments were received in favour of both higher and lower limits
113	DGAC	France	Weight	Replace 43560kg with 5700kg	Acceptance of 43560kg was generally agreed. Comments were received in favour of both higher and lower limits
113.1	DGAC	France	Note para 1	Delete note.	The note should remain in an amended form. Deletion of the reference to Airworthiness Directive.
113.2	DGAC	France	Para 2 Systems	Add extra paragraph to take into account Service experience and generate text for the consideration of IFSD and engine reliability. Also calling for 'hard number' IFSD.	Partly agree . The generation of 'hard number' IFSD rates has already been discounted as not practical when considering the fleet sizes and number of hours flown by the fleet; However, the reliability aspect is considered in JAR 21.3. and para 3
113.3	DGAC	France	Para 2.c.	Text change referring to APU.	This text is amended to include <u>essential</u> and <u>Parts A & B</u>
113.4	DGAC	France	Para 4.e.	Text change to include <u>flight planning and release</u> and mention of JAR-OPS 1.297 Table 2.	These areas are addressed in the text changes proposed.
114	DGAC	France	Appendix 1	Include auto-pilot and weather radar in text of requirements	Disagree. IL 20 only requires consideration of a single failure in this context, this appendix is a double failure requirement

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115	Airbus	France	para 2	Revert to 5700kgs instead of 43560	Acceptance of 43560kg was generally agreed. Comments were received in favour of both higher and lower limits
116	Airbus	France	All	Operators can currently take advantage of 'grandfather rights' to apply ICAO 90 minutes at two engine speed. This should be end dated for existing ops and not granted to new type/ops.	It is normal for operational NPAs of this type not to set compliance dates, These are subject to the agreement of the Authority
117	Airbus	France	IFSD	IFSD in IL20 has to be considered by application of JAR 25.1309 to increase from 120 to 180 minutes. This should be applied to NPA 14	IFSD is addressed as far as practicable in the new para 3
118	Airbus	France	Harmonisation	Scheduled operators in US must comply with FAR 135 (AC120-42A) JAA should refer to IL 20	Disagree. This is in effect a non-ETOPS operation hence will not need to comply with IL20.
119	Airbus	France	APU	APU reliability should be considered accordingly	Noted, the APU is considered in para 2c
121	Airbus	France	Electrical distribution	Auto-pilot, weather radar & crossfeed valve must be powered in emergency configuration	Disagree. IL 20 only requires consideration of a single failure in this context, this appendix is a double failure requirement
122	CAA Hungary	Hungary	All	Agreed	Agreed
123	Volkswagen	Germany	All	Agreed	Agreed
124	Du Bois	France	All	Agreed	Agreed
125	Fokker	Holland	All	Accepted	Noted