

General.

Note: In addition to the comments which were received on the specific proposals, some commentors made comments or suggestions of a general nature. The responses to these are shown below.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	094	Transport Canada	Commentors expressed general agreement with the proposals	Noted	--	--
	108	CAA Hungary				
	114	CAA Iceland				
	231	Air 2000				
	273	LFV Norway				
	293	LFV Sweden				
2	310	Brit. Aerospace	A generalized complaint that the JAR uses 3 numbering systems	Noted	--	No change intended at the moment
	137	CAA UK	Editorial comment	Noted	--	--
3	136	CAA UK	Changes to Subpart N should take full account of JAR-FCL	Noted	FCL/OPS co-ordination group to deal with this.	--
	027	CAA Czech	Several comments concerning Subpart K	Attended to under 'K'	--	--
	239	Martinair	Maintenance Postholder to be a separate person	Attended to under 'C'	--	--

Subpart A.

Refer to NPA-OPS-12

JAR-OPS 1/3.001(a)(2)

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	34 19	CAA Finland Finnish Aeronautic	Parachuting should be an exempted category	Agree	It is intended to regulate for parachuting under Parts 2 and 4	Additional para. (a)(2) to exempt parachutists
2	25 26	Heli Air Zagel Agrarflug Helilift	Should be no limit on number of pax	Disagree	Wide agreement that 6 is a reasonable limit provided that parachutists and firefighters are exempted	--
3	32	Skyjet AG	Authority could approve more than 6 pax	Disagree	Ditto above	--
4	36	Transport Canada	Exclude firefighters and all crew of Aerial Work	Agree	Aerial Work to be regulated under Parts 2 and 4	Firefighters exempted under new para. (a)(2)
5	38	INAC Portugal	Not presently limited by law	Disagree	Portugal's members agree that number can remain at 6 if firefighters and parachutists exempted	--
6	46	LFV Sweden	Redefine AW and CAT, increase number to 9	Disagree	The text is not intended as a definition of CAT or AW; it is provided to allow the continuation of existing activities until the production of JAR-OPS 2 and 4	--
7	17 43 49	FR Aviation GAMTA DGAC France	Should be regulated in JAR-OPS 2 and 4	Disagree	See item 6 above	--
8	10 13 16 22 27	CAA Iceland CAA Malta LBA MOT Austria BAZL FOCA	Support of the proposal (Malta suggests that the example given in para.5 of the	Noted	--	--

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
	30 33 35 44 47 12 23 41	CAA Slovenia CAA Denmark RLD ENAC Italy LFV Norway Lynton Aviation EHA BHAB	introduction should become an IEM)			
9	45	BMV Bonn	Proposes different text	Disagree	The words ‘immediately before, during or immediately after’ were used to ensure clarity and unambiguity of meaning	--
10	48	CAA UK	Proposes different text	Disagree	The proposed additional text does not improve clarity. The proposal is a duplication of the condition that persons carried must be connected with the Aerial Work activity.	--

JAR-OPS 1/3.125

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	6 7 10 16 30 33 35 37 44	CAA Hungary N/k CAA Iceland LBA CAA Slovenia SLV Denmark DGAC NL Transport Canada ENAC Italy	Support of the proposal without comment	Noted	--	--
2	40 50	ALPA USA DGAC France	Support of proposal but suggest additional provisions	Agreed		Additional Section 2 material agreed and

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			to allow for loss or theft.			included
3	3 4 5 11 21 39 42	UK Flying Club PDG Heli Ltd. Air Malta Lynton Av. Ltd Maersk Air IAOPA BHAP	Retain original text	Agreed	Avoid unnecessary administration (Falsification cannot be avoided) Note: activity vis-à-vis ICAO?	See Annex 1 and 2 to comment No:5
4	14 15 20 24 29	CAA Malta Sabena AEA EHA Alitalia Express	Allow copies to be carried for all documents (at the choice of the operator)	Partly agreed	See items above and comment No:20 'at the choice of' is considered unnecessary addition	
5	1 and 2 8 and 9 18	Bxl national airport Bond Helicopter Ltd British World Airline	For some documents copies should be acceptable	Noted	--	Proposal amended accordingly. Legal opinion is that ICAO requires the original of some of the documents.
6	31	Skyjet AG, CH	Useless to regulate; depends on national law	Noted		
7	28	FOCA	Original of Flight Crew licence to be carried (subpara. b)	Not agreed	Would cause problems at the time of renewal of licence.	Add: 'original or copy'

Subpart B.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	276 002 139 256	DGAC Lux Finnair AEA CAAd Finland	IEM 1.065(a): Delete	Agreed	Subject is already covered in para 2 of IEM 1.065	Deleted
2	201	DGAC France	IEM 1.065(a) alternative	Agreed		

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			suggestion to delete			

The following Subpart B comment/responses are an abbreviation of a lengthy and comprehensive explanation put to the OC as Working Paper 20.4B/00. For the full response, reference should be made to this WP.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
3	096	ORCG	1.037(a): add 'and maintain'	Agreed	Will avoid doubt	Words added.
4	200	DGAC France	1.037(a): Emphasise Flight Safety Prevention programme	Noted and discussed		Substance of comment incorporated by development of new paras. (b) and (c)
5	115	Operator	1.037(a)(2): Small operators, with few aeroplanes, will not be able to establish trends and should not be required to establish an occurrence reporting scheme.	Not agreed.	Occurrence Reporting Scheme is an integral part of the Acc. Prevention and Flt. Safety Prog. The Scheme will support the operator's ability to address deficiencies and Flt. Safety.	--
6	041 057 122 173	IFALPA ALPA Germany ECA OPSG	1.037(a)(2): Reporters should have the right to remain anonymous or that the whole scheme should be confidential and voluntary.	Partly agreed	Voluntary scheme removes obligation to report. Complete anonymity would make info. difficult to disseminate	Text amended to require operators to accept anonymous reports
7		LBA	1.037(a)(4): new subpara. needed; 'the appointment of a person accountable for managing the prog.'	Agreed	Most operators would appoint such a person but the JAR does not actually require it.	Text amended accordingly
8	041 057 173	IFALPA ECA SNPL	IEM 1.037(a)(2): upgrade to AMC	Not agreed	Value of this suggestion is negated by development of JAR-11 proposals	--
9	039	Manufacturer	IEM: change the overall objective from 'dissemination to other persons' to 'reporting to the Authorities'	Not agreed	To restrict distribution as suggested might prevent the info. reaching the interested parties	--

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
10	001 056 138 193 275	AEA DGAC Lux Operators	IEM para 4: questions the need for or the meaning of the para.	Agreed	Little reason to keep the para.	Para. deleted.
11	41 173	IFALPA ECA	Suggest that occurrences should remain in the database; the significance may not be apparent until later.	Agreed		Text amended accordingly
12	034 098	Dassault ORCG	1.085(b)(1): suggest align the text with JAR-21 and/or include the word 'fault'.	Partly agreed	Meaning of 'fault' could include 'failure'	Word order changed (see JAR-21) and 'fault' introduced.
13	003 140 202 277 227 248 098	AEA DGAC Fr DGAC Lx Operator IAOPA ERA ORCG	Not all crew members would be competent to identify an 'airworthiness' problem. Suggest words 'perceive' or 'believe' or, alternatively delete 'airworthiness'. Also four of these suggest additional para. to avoid the need for every crew member to report the same occurrence.	Partly agreed Agreed		Words "... which he believes may affect ..." included; 'airworthiness' retained. Additional words inserted.
14	028	-	One comment included suggestion that it is wrong to teach all crew members to make report; if they fail, this might absolve the operator of ensuing responsibility.	Not agreed	Point taken but, on balance, it is thought that most commanders and operators would prefer to teach the need for reporting.	--
15	116	Operator (small a/c)	Need for crew members to report should not apply to small aeroplane operators.	Not agreed	The commander of any aeroplane should know if one of the crew have noticed something untoward.	--
16	099	ORCG	1.085(b)(2); suggest delete words 'endangered or could have endangered'; all	Not agreed	1.420 refers to incidents and this para. relates to faults etc. which might become incidents if not	--

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			incidents should be reported under 1.420(a)		reported.	

Subpart C

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	058	SNPL	1.175 (g)	Deletion of "capable of exercising operational control" is not acceptable	Not agreed	Not necessary to specifically mention the capability; NPA text reflects the capability adequately	-
2	113 278	HQ Maintenance Div DGAC - Lux.	1.175 (j)+ (k)	-No discriminant of 20 empl. (Delete k) -2 persons minimum to cover four areas	Not agreed Not agreed	NPA text is more prescriptive than maintenance proposal -For very small organisations 1 person could be enough	-
3	130 301 302 239	CAA-UK CAA D RLD-NL Martinair	1.175 (j) " " " (general)	Combination for flight ops or crew training with maintenance is acceptable " " " but only for very small organisations Strongly opposing combination of fl.ops with maintenance (balance may be lost) For size of Martinair no combination with maintenance is acceptable	Noted Noted Noted Noted	Combination flight ops/crew training with maintenance should only be made for small organisations (economical reasons) and subject to acceptance by the Authority. Proper qualification of the person is necessary.	-
4	004 141 203	Finnair AEA DGAC-F	1.175 Appx 2 para (a)	Experience in aviation Delete "civil"	Agreed	Experience in military aviation is a valid one	Delete "civil"
5	117	Skyjet (ZRH)	1.175 Appx 2 para (a)	Managerial <u>competency</u> in civil aviation acceptable to the Authority as appropriate (experience not necessary)	Agreed	This change is necessary to start a very small organisation	see summary of the comment
6	232	Air 2000	1.175 Appx 2 para (a)	technical <u>or</u> operational... (editorial)	Not agreed	techn./operational means and/or which is the intention	-
7	059	SNPL	1.175 Appx 2 para (b)(3)	Do not accept complete deletion of old (b)(3)	Not agreed	Requirement is covered in 1.175(g) as amended by NPA. See item 1 above	-

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
8	229	FOCA	1.175 Appx 2 (b)(3) new	"unless acceptable to the Authority concerned " should be deleted	Not agreed	Flexibility is necessary and Authority is entitled to refuse if it wishes	?
9	233	Air 2000	1.175 Appx 2 (c)(3)(iii)	Change sequence to: "crew member and ground staff"	Agreed	To follow sequence of (c)(1) and (c)(2). Editorial	See summary
10	274	NCAA	AMC 1.175 (i)	Agreement to NPA, based on experience in Scandinavia	Noted	-	-
11	112	HQ Maint. Div	AMC 1.175 (i) item 1.2	Give separate requirements for Nom. Postholder Maintenance. New item 1.3	Noted	The expertise needed for Nom. PH Maintenance indeed is different and is covered by para. 3 of same AMC	See comment No.113
12	093	Britannia	AMC 1.175 (i) 1.1-1.5	Britannia object to the requirement to have airline experience	Noted	Comment not clear	
13	204	DGAC-F	AMC 1.175 (i) item 1.2(c)	...the <u>relevant parts</u> of the operations manual	Agreed	Is covered by comment No. 112	See 112
14	118	Skyjet (ZRH)	AMC 1.175 (i)	The exception mentioned at the beginning of 1. should be applicable to all items. Re-numbering is proposed	Agreed	The text in 1. mentions also "licensing". Therefore items 2, 3, etc, should be covered by the exception as well	Similar to the one proposed in the comment No. 118
15	004 141 279	Finnair AEA DGAC-Lux	AMC 1.175 (i) items 1.4 and 1.5	- "management <u>capabilities</u> in a..." - sufficient work experience (5 years considered sufficient)	Noted Not agreed	Change under 5 above covers this The proposal would not really change the requirement and the rewording under 14 will introduce the necessary flexibility	See comment 004 -
16	194	Monarch	AMC 1.175 (i) item 2	"...should hold, or has held within the last five years, a valid..."	Not Agreed	If this were agreed, both the Postholder and his Deputy could be without a current licence. Intention is that one of them should be current.	See comment No. 194

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
17	111	HQ Maint. Div	AMC 1.175 (i) item 3.1	add: "as appropriate"	Not agreed	The NPA text leaves enough flexibility; the word 'relevant' is used and item 14 above is also of relevance to this point.	–
18	110	HQ Maint. Div	AMC 1.175 (i) item 3.3	Delete para 3.3 as it is not necessary to have knowledge on all types operated	Not agreed	The acceptance of comment No. 118 (see item 14 above) allows alleviations in particular cases and some knowledge is necessary – not full technical competence.	–
19	078 205	SNPNC DGAC-F	AMC 1.175 (i) item 4	Add a sentence that the Nom. Postholder Training should be assisted concerning Cabin Crew training.	Agreed		See comment 078 or 205
20	228 249	IAOPA-EU ERAA	AMC 1.175 (i) item 4	"...current Type Rating <u>Instructor</u> on a type..." (Alleviation for small/start-up AOC holders)	Agree?	?	
21	023	Eurocontrol	AMC 1.175 (I) item 1.2	add (d) on reporting occurrences according to Eurocontrol requirements	Not agreed	1.2(a) and (c) cover the case	–
22	119	Skyjet (ZRH)	IEM 1.175 (j) and (k)	Text should be more precise and specify: "...employed for tasks related to flight operation or maintenance by an operator..."	Not agreed	Impossible to be so precise	See comment No. 119

Subpart D

Note: Items 1 to 21 which follow are taken from OC WP 20.4/00 which should be examined for the complete response (see also items 3 onwards of Subpart B above)

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	12.1 24 30 46 67 100 129 150 178 198 244 284	Numerous	1.420(a) Terminology; suggest that the terms should repeat those used in Annex 13	Agreed		'Occurrence' not used as a term of its own. Terminology aligned with Annex 13
2	295	SLV	Terminology; suggest use of the text of the EC Directive	Not agreed	EC Directive text somewhat unclear and already agreed to follow Annex 13 (see 1 above)	--
3	101	ORCG	1.420(b)(1); all reporting instructions should be in .420 (cross reference unnecessary)	Not agreed	(b)(1) forms an essential link with crew responsibilities which <i>could</i> include incident reporting	--
4	35	Dassault	.420(b)(2); aeroplane manufacturer should also be informed (compare JAR-21)	Noted	The para.(b)(4) mentions the 'organisation responsible'; this would include the manufacturer. Also ORCG's draft ACJ specifies what is meant by 'organisation responsible'.	No change
5	102	ORCG	.420(b)(2); suggest remove words 'malfunction or defect'	Agreed		Words removed
	103,104		The 72 hour deadline for a report should be in a separate para. and clarification reqd.	Agreed		Amended accordingly

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
	129		Delete reference	Agreed		Deleted
6	12.2 150 284	AEA Finnair DGAC Lx	.420(b)(3); delete the last sentence (report to Authority)	Not agreed	Without the sentence, there is a risk that an entry in Tech Log would be thought sufficient.	No change
7	36	Dassault	.420(b)(4); replace 'fault' with 'failure' and 'aircraft' with 'aeroplane'	Partly agreed	'Fault' would include 'failure'	Text amended to 'aeroplane'
8	105 265	ORCG Austro Control	.420(b)(4); replace 'manufacturer' with 'organization responsible' Definition too narrow	Agreed		Text amended accordingly
9	-	LBA in committee	.420(c); 'Serious incident' and 'Accident' reporting should be associated	Agreed		Various changes to the para.
10	47 66 179	Several	.420(c)(1); suggest add a time limit of 48 hrs to this para.	Partly agreed		Separate para.(c)(2) added with a deadline specified
11	264 308	BAe Austro Control	.420(c)(1); suggest additional words to allow for the fact that the commander may be a casualty	Agreed		Text amended accordingly
12	106	ORCG	.420(c)(1); delete words 'resulting in serious injury' etc. This is implicit in definition	Agreed		Text changed
13	37	Dassault	.420(c)(1); should require reporter to inform other agencies	Agreed		Text changed
14	12.3 150.3	AEA Finnair	.420(d)(1); may be impractical to expect commander to submit a written report	Agreed in principle		Text modified to meet the intent of comment

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
15	264.2	Austro Control	.420(d)(3)(ii); insert 'or the operator'	Agreed in part	Commander remains the right person but may not be the one to find the damage	Text changed to nominate the operator in the commander's absence
16	264.3	Austro Control	.420(d)(5); insert 'or the operator'	Not agreed	Text already includes 'in his absence the operator'	--
17	133	CAA UK	.420(d)(5); use same text as in 1.1245	Partly agreed	Not useful to use the whole text	The last line of 1.1245 included
18	31 48 68 129.4 180	IFALPA supported by several	.420(d)(6); JAR-1 should include definitions for the conditions listed Also include 'loss of a/c nav. accuracy'	Noted Not agreed	The list is not intended to be exhaustive, examples only Already addressed elsewhere (either in normal incident reports or in Air Traffic incidents)	
19	308.1	BAe	.420(d)(6); how is the commander aware of high radiation?	Point taken		Removed from list
20	026	Eurocontrol	Suggests that 1.420 should cover wider issues such as Air Traffic Movement occurrences	Not agreed	Para.(d)(1), 'Air Traffic Incidents' is sufficient for JAR-OPS (ORCG's draft ACJ covers ATC aspects)	--
21	129.1	OPSG	Suggests change of title of 1.420 to 'Incident Reporting'.	Not agreed	Would recreate difficulties which were encountered when 'Occurrences' were addressed in separate JARs	--

Subpart E

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	00049 00181	IFALPA ECA	A1-1.430 (h)	Conversion not to be used for planning	Partly accepted pending the AWO harmonisation	Suggested to be allowed in draft ANPA which contains some more criteria. The option only to allow conversion for DEST will be considered in the harmonisation. ANPA should be awaited. Margins are unchanged if conversion is for DEST only.	
2	00069 00216	SNPL DGAC-F	A1-1.430 (h)	Conversion not to be used for planning and not for vis > 1500 m	Partly accepted pending the AWO harmonisation	See above. Not allowing conversion above 1500 m would effectively raise the minima.	
3	00013 00151 00285	Finnair AEA DGAC-Lux	A1-1.430 (h)	Add "forecasted and/or"	Partly accepted (for DEST only) pending the AWO harmonisation		
4	00237	Air 2000	A1-1.430 (h), note	Change "expressed" to "passed, reported, stated or given"	Accepted	Agrees that "reported" would be more clear	"If the RVR is expressed , <u>reported</u> as being above.."
5	00252	ERA	A1-1.430 (h), note	The note is not understood and needs clarification	Accepted	Agrees that there is a need to explain this not better. The change in the ANPA from RVR to RVR/Visibility may enhance the understanding further.	"If the RVR is expressed , <u>reported</u> as being above the the maximum values assessed by the aerodrome operator, <u>e.g.</u> " <u>RVR more than 1500 m</u> ", it is not...

JAR-OPS Subpart E Appendix 1 to JAR-OPS 1.440

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
6	00245	Martinair		Agrees with the	Noted		

				proposal			
7	0014 0152 00262	Finnair AEA CAAd, Finland	(h)(1)	Remove the requirement for verification at each runway for Cat III ops	Rejected	Certification is done on a limited number of runways/facilities. Experience has shown that unexpected type/equipment specific problems can arise. An efficient exchange of information between operators will reduce the burden of the proving. This requirement is harmonised with FAA AC 120-28D	-----
8	00217	DGAC-F	(h)(1)	Should only be applicable to DEST not to ALTN and applicable to the aerodrome not the particular runway	Rejected	See comment 00152 above plus the fact that planning minima for a Cat III ALTN will be limited to Cat I values.	
9	00282	DGAC-Lux	(h)(1)	A number of approaches is not relevant without a spec for level of confidence.	Noted	The previous text comprising confidence level and success rate was considered to be too complicated. The proposed text is a simplified way of obtaining a comparable result. The requirement is harmonised with FAA AC 120-28D.	

JAR-OPS Subpart E, AMC to Appendix 1 to JAR-OPS 1.440

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
10	00015 00153 00263	Finnair AEA CAAd, Finland	1.3	"Models" should be defined	Accepted	Models are not used in JAR-OPS	If an operator has different variants of the same type of aeroplane utilising the same ... systems on the same type/classes of aeroplane ... of each variant.

Subpart G

JAR-OPS 1.510

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response
1	050	IFALPA SNPL ECA	The proposal should address all Cat I instrument approaches and not just those with missed approach gradients greater than 2.5%	Accepted in principle
	070			
	182			
	2	Martinair	Suggests deletion of references to JAR-25 and JAR-AWO	
	3	Finnair AEA	Reference to work of ARAC PERF HWG	
4	218	DGAC	Ditto	
5	038	Dassault	Ditto	

The PERFSC has considered these comments and accepts that the proposed regulation should address all Category I instrument approaches, and not just those with missed approach gradients greater than 2.5%. However, recent discussions within the ARAC Aeroplane Performance Harmonisation Working Group (PERF HWG) have also included a focus on how to regulate obstacle clearance accountability during the go-around. These discussions are on-going and have the potential for further development of JAR-OPS 1.510.

Martinair Comment No. 000246 Relating To JAR-OPS 1.510

The PERFSC agree that the references to JAR 25 and JAR-AWO can be deleted.

Finnair Comment No. 000016 Relating To JAR-OPS 1.510.

AEA Comment No. 0000154 Relating To JAR-OPS 1.510

The PERFSC agrees with the comment. The ARAC PERF HWG discussions are on-going and have the potential for further development of JAR-OPS 1.510.

DGAC Comment No. 000218 Relating To JAR-OPS 1.510

The PERFSC agrees with the DGAC comments and will aim to develop these proposals during the ARAC PERF HWG discussions which are on-going and have the potential for further development of JAR-OPS 1.510.

Dassault Comment No. 000038 Relating To JAR-OPS 1.510

The PERFSC agrees with the comment with respect to deleting reference to JAR-AWO 243

Subpart K

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	155, 287	AEA, MOT Lux.	AMC OPS 1.720(c)/1.725(c)	Agreed without comments	Noted Referred to FRSG	--	As per FRSG proposal (to be circulated as new NPA)
2	266	Austro Control	idem	Refer to Annex 6 Part I dated July 1998	Noted Referred to FRSG	--	As per FRSG proposal (to be circulated as NPA)
3	219, 220, 288, 017, 156	DGAC-F, MOT Lux., Finnair, AEA	JAR-OPS 1.760 (a)	To make the rule and the IEM consistent, reword JAR-OPS 1.760 and delete subpara. 3 and 4 of the IEM	Noted Referred to OSG	For response to items 3 to 10, see Page 19, below --	
4	247, 267	Martinair, Austro Control	IEM OPS 1.760	Delete bullet 1 from the IEM, since it duplicates the rule	Noted Referred to OSG	--	
5	299, 300	LBA	JAR-OPS 1.760 and IEM	Disagree in total with the NPA text; retain the original text	Noted Referred to OSG	--	
6	191, 231	AIA, Air 2000	idem	Agreed	Noted Referred to OSG	--	
7	051, 071, 183	IFALPA, SNPL, ECA	IEM OPS 1.760	Disagree that the period during which the first aid oxygen may be necessary should be half of the flight time before landing after a cabin depressurisation	Noted Referred to OSG	--	
8	268	Austro Control	IEM OPS 1.760	Propose some improvement to the text of the IEM	Noted Referred to OSG	--	
9	027	CAA-Cz	IEM OPS 1.760 AMC OPS 1.770 (b)(2)(v)	In IEM OPS 1.760 the AFM is quoted for emergency descent conditions, while in AMC OPS 1.770 (b)(2)(v) AOM is quoted	Noted Referred to OSG	--	
10	164, 269, 033,	Various	AMC OPS 1.770	--	Referred to Oxygen	--	

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
	120, 121, 226, 230, 253, 309		(b)(2)(v)		Study Group		
11	157	AEA	JAR-OPS 1.800	Agreed	Noted	--	--
12	270	Austro Control	JAR-OPS 1.800	Add a note to JAR-OPS 1.800, as per ICAO Annex 6.2.4, to clarify that break-in areas are not a requirement	Noted	The proposed note is not necessary; a 'rule' should not say what is <u>not</u> required.	No change
13	052, 184, 072, 089, 166, 271, 080	IFALPA, ECA, SNPL, ITF, ICCA, Austro Control, SNPNC	AMC OPS 1.830 (b)(2)	Maintain the original text in bullets 1, 1h and 2	Not agreed	Due to the space available in the raft, survival equipment cannot be contained therein; the NPA text allows that the survival equipment may be contained in a pack readily available with the raft. The amount of water provided in the survival kit is a minimum quantity to be used for medical purposes. This does not prevent operators to increase the quantity as appropriate; in addition, the NPA text provides for alternative or additional means of producing drinkable water	Insert the word "readily" in bullet 1 before "available with". Insert the verb "be" in bullet 1 since it was wrongly deleted.
14	134	CAA-UK	AMC OPS 1.830 (b)(2)	Clarification on glucose tablets to be carried	Noted	NPA text didn't change the intent of the AMC; editorial changes only	In bullet 1h introduce the word "of" before "glucose tablets"
15	158	AEA	AMC OPS 1.830 (b)(2)	Agree with NPA	Noted	--	--
16	190	AIA	AMC OPS 1.830 (b)(2)	Change "First aid equipment" into "First aid kit". Specify the content of the first aid kit for survival purposes	Not agreed	JAR-OPS 1.830 requires that additional survival equipment for the flight to be undertaken must be carried; it is to the operator to specify which first aid equipment may need for this purpose.	None
17	189	AIA	AMC OPS 1.830	Disagree with additional	Not agreed	JAR-OPS 1 is based on ICAO	None

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			(b)(2) and AMC OPS 1.835 (c)	survival equipment for commercial air transport aeroplanes and ask some specific clarification		Annex 6 which requires survival equipment for long overwater flights and for flight over designated land areas; harmonisation with FAA regulation and practices is beyond the scope of NPA	
18	053, 073, 185, 272	IFALPA, SNPL, ECA, Austro Control	AMC OPS 1.835 (b)(2)	Propose to retain the existing text	Not agreed	The amount of water provided in the survival kit is a minimum quantity to be used for medical purposes. This does not prevent operators to increase the quantity as appropriate; in addition, after an emergency landing, any drinking supply on board may be used by the survivors	None
19	074, 272	SNPL, Austro Control	AMC OPS 1.835 (c)	Disagree that snow shovel and ice saw are deleted from the survival equipment	Not agreed	The snow shovel and ice saw are considered unnecessary, since they were not used in practice for many years and other means are easily available on board for the same purpose.	None

Subpart L

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
20	018, 159, 020	Finnair, AEA, SNPL	JAR-OPS 1.865	Introduce the transition period until 01.01.2001 in the rule (first option)	Noted	Introduction of the transition period in the rule would introduce the temporary exemption mechanism in JAR-OPS 1; this is not convenient since it complicates the rule for a short period of practical application. EQSC suggests to leave the text of JAR-OPS 1.865(e) as proposed by NPA and refer to the preamble of	No change; the comment has been overtaken by time

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
						JAR-OPS 1 to delay implementation of this paragraph to 1.1.2001 as allowed by TGL no.16	
21	135 27	CAA-UK CAA (Czech)	JAR-OPS 1.865	Transfer the TGL no.16 into an exemption policy (second option)	Noted	This procedure has been used on other occasion for JAR-OPS requirements (ELT, ACAS, etc.)	None No action is necessary since TGL no.16 may be considered as a JAA exemption policy

Subpart K (Oxygen items deferred to OSG by EQSG)

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	219, 288, 017, 156	DGAC-F, MOT Lux., Finnair, AEA	JAR-OPS 1.760 (a)	To make the rule and the IEM consistent, reword JAR-OPS 1.760 and delete subpara. 3 and 4 of the IEM.	Partially agreed	It was not intended to change the requirement in Section 1; subpara 3 and 4 only explained the most probable conditions for the calculation of the quantity of first aid oxygen. To avoid any contradiction to the rule, the IEM has been reworded.	In JAR-OPS 1.760 changed the word “provided” with “shall be sufficient”, to clarify that the requirement address the calculation of first aid oxygen. In addition, the text has been amended to require at least 2 portable dispensing units. IEM-OPS 1.760 has been reworded to specify the conditions under which the calculation of first aid oxygen is made.
2	247, 267	Martinair, Austro Control	IEM OPS 1.760	Delete bullet 1 from the IEM, since it duplicates the rule.	Agreed	Editorial mistake in the NPA text.	The content of subpara. 1 of the IEM is deleted (A new text has been introduced to clarify the meaning of the rule).
3	299, 300	LBA	JAR-OPS 1.760 and IEM	Disagree in total with the NPA text; propose to retain the original text.	Not agreed	The NPA text has been proposed to answer the concerns of some industry representatives which indicated that calculation of first aid oxygen in accordance with JAR-OPS 1.760 would impose to carry a huge amount of oxygen bottles on board. The scope of the proposed IEM-OPS 1.760 was to specify the applicable criteria and conditions for the calculation of first aid oxygen. In the calculation of first aid oxygen, the operator should consider that full coverage to all passengers on board is provided by the supplemental oxygen as calculated i.a.w. Appendix 1 to JAR-OPS 1.770 for any period when	The new text of subpara. 1 of IEM OPS 1.760 together the one in subpara 2 are provided to harmonise the meaning of requirement in JAR-OPS 1.760.

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
						the cabin altitude remains above 15000ft. Therefore the proposed text is not intended to reduce the amount of first aid oxygen available for supply to passengers who require it after the emergency descent.	
4	191, 231	AIA, Air 2000	idem	Agreed with the NPA.	Noted	--	None

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
5	051, 071, 183, 220	IFALPA, SNPL, ECA, DGAC-F	IEM OPS 1.760	Disagree that the period during which the first aid oxygen may be necessary should be half of the flight time before landing after a cabin depressurisation.	Agreed	The sentence in subpara 4 of the IEM was introduced as an assumption for the calculation of first aid oxygen, under the most probable conditions which may occur after a cabin depressurisation. Since the meaning of the sentence has been misunderstood by more than one commentor, it is agreed to remove it and the reword the IEM.	See the IEM as reworded.
6	268	Austro Control	IEM OPS 1.760	In subpara. 3: take into account the route to be flown. In subpara. 2b: make reference to Appendix 1 to JAR-OPS 1.770.	Agreed in principle Agreed	The conditions for the calculation of first aid oxygen should consider the minimum en-route altitude. Reference to Appendix 1 to JAR-OPS is more accurate.	The concept has been expressed in other words in the reworded subpara. 4. As suggested by the commentor.
7	027	CAA-Cz	IEM OPS 1.760 AMC OPS 1.770 (b)(2)(v)	In IEM OPS 1.760 the AFM is quoted for emergency descent conditions, while in AMC OPS 1.770 (b)(2)(v) AOM is quoted.	Noted	The prevailing reference should be the AFM; nevertheless, to avoid contradictory information, reference to AFM has been removed from IEM OPS 1.760, since the operator should know where to find the emergency descent profile and conditions.	See the reworded subpara. 4 of the IEM.

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
8	164, 120, 121, 253, 230,	Ausburg Airways, Tyrolean Airways, ERAA	AMC OPS 1.770 (b)(2)(v)	Change 17 sec in place of 20 sec. Change VRA to VMO or the speed specified in the AFM. Ask for 10 min oxygen between FL150 and FL130.	Agreed Agreed Not agreed	Figure provided in advisory material associated to FAR 25.841, acceptable for type certification of the aeroplane. Reference to the AFM is feasible for the safety of the flight. This would change the reference requirement, which is out of the scope of the NPA.	AMC modified accordingly.

Item	Comment Number	Commentor	JAR-OPS paragraph	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
9	033, 230	Brymon Airways Bombardier	As above	No time delay before starting the emergency descent (in addition to the proposed change of VRA to VMO).	Not agreed	No time delay is unrealistic; to perform the required actions before starting the emergency descent, pilots need some time; this is recognised also by type certification compliance demonstration procedures.	None
10	226	Airbus	As above	Add in the title “ not certificated to fly above 25000ft.	Agreed	Editorial	As proposed by the commentor
11	309	Not known	As above	In para 2a delete “at his own discretion”.	Agreed	Not necessary for the purpose of the AMC.	None
12	269	Austro Control	As above	Change “estimated mass” to “critical mass”.	Not agreed	Already rejected by OC when the test provided by EQSC was endorsed for NPA.	None

Subpart M

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	019 160 221 289 109	Finnair Flt. Ops. AEA DGAC Conseiller Ops JAA Maint Div	In accepting that the Cabin Defects Log can be an extension of the Tech Log, alternative wording is suggested.	Partially Accepted	The Cabin Defect Log is intended to record all cabin items which require attention; the wording used should not exclude non-safety related entries.	(Para. 1); ... Where a means of recording <i>defects or malfunctions in the cabin or galleys that affect the safe operation of the aeroplane or the safety of its occupants</i> , separate from ... etc.
2	040	Dassault Aviation	Amend AMC OPS 1.915 2 Section 3v to align with JAR-21	Agreed	Compare JAR-21.3	v. Details of any <i>failure</i> , defect or <i>malfunction</i> to the aeroplane ... emergency systems and any <i>failure</i> , defect ... etc.

Note; the changes (which are noted above) to the text distributed at NPA have been agreed with the JAA's Maintenance Division.

Subpart N

JAR-OPS 1.970 RECENT EXPERIENCE

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1.	000054 000186	IFALPA ECA	The recency requirements for commander and co-pilot should be the same and should include the co-pilot carrying out at least 3 take-offs and landing as a pilot.	See comment 3 below.		Nil.
2.	000054	IFALPA	Supports 6 take-offs and landings (a minimum of 3 on simulators) in the preceding 60 days as pilot-flying; including 3 instrument departures and 3 instrument approaches; one manual; and 125 hours per six months.	Noted	This is more restrictive and is not supported at all. The JAR-OPS rule conforms with the ICAO requirement.	Nil.
3.	000222	DGAC France	For a co-pilot, to have served at the controls for 3 take-offs and landing is not considered sufficient. The requirement should be to have operated the controls.	Accepted.	Co-pilots recency in JAR-OPS 1.970 should comply the requirements of ICAO. It is proposed that the text be amended to read “.....unless he has operated the controls as a pilot for three take-offs and landings.....” <i>Note:</i> There must be the flexibility for simulator use for co-pilot recency as for commander.	JAR-OPS 1.970, Para (a) (2) “.....unless he has operated the controls as a pilot for three take-offs and landings.....”

JAR-OPS 1.980 OPERATION ON MORE THAN ONE TYPE OR VARIANT

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1.	000296 000161 000290 000020	Luftartsverket- Sweden AEA DCA Luxembourg Finnair	The period of validity for proficiency check for validation or renewal of type rating should be the same as for the operator’s proficiency check. In this respect JAR FCL should be co-ordinated with JAR-OPS and not vice versa. There is no reason why the flexibility in JAR-OPS 1 is not reflected in JAR FCL.	Noted.	A solution to this problem cannot be achieved by amendment of JAR-OPS. The anomaly arises from the wording of JAR-FCL which takes account of the problems of PPL administration.	<i>Note 1:</i> This has been raised several times in JAR-OPS 1/JAR FCL co-ordination meetings including February 2000. <i>Note 2:</i> DGAC France and CAA UK have a particular interest.

Subpart O

JAR-OPS 1.1010 CONVERSION AND DIFFERENCES TRAINING

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1.	000171 & 000085	ICCA	Text to include a statement that conversion and differences training be specified in the OM and be approved by the Authority.	Noted	The NPA-OPS 15 proposed text states that conversion and differences training be approved by the Authority. JAR-OPS 1 Subpart 'P' already requires that cabin crew training be specified in the OM. Further reference is not considered necessary. The NPA-OPS 15 proposed text is consistent with the relevant text of JAR-OPS 1.1005 & JAR-OPS 1.1015.	Nil.

APPENDIX 1 TO JAR-OPS 1.1015 RECURRENT TRAINING

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1.	000076 000084 000223	SNPL ITF DGAC (France)	The 3 yearly interval for practical checks (ie exit operations and fire-fighting) was inadequate and should be reduced to either every 2 years or to annually.	Not accepted.	The majority of the FCCCSG did not consider that a reduction of the 3 yearly criteria was justified or had been substantiated by the comments received. The cabin crew organisations did not accept the Group's decision. DGAC considered that 2 years was a reasonable compromise. The majority of the Group were also satisfied that JAR-OPS 1 Subpart 'O' was in compliance with ICAO Annex 6,	Nil.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
					Chapter 12. <i>(Comment Number 16 also refers.)</i>	
2.	000172	ICCA	The interval of 3 years is of primary concern in respect of maintaining the required level of competence.	Not accepted.	As above.	Nil.
3.	000172 000081	ICCA SNPNC	In order to ensure maintenance of the required skills and competence recurrent training should be provided annually.	Not accepted.	The statement is not supported at all. No documented evidence has been submitted to support the claim that an acceptable level of competence is not being maintained. Many items of recurrent training are required to be addressed on an annual basis.	Nil.
4.	000172	ICCA	Cabin crew do not necessarily operate doors in normal operations. Therefore some cabin crew will have no experience of operating an exit for up to 3 years.	Not accepted.	It is accepted that for some cabin crew, especially cabin crew operating wide-bodied aircraft types, door operation is not achieved during normal operations. However, JAR-OPS 1.1015 does require annual training for exit ‘touch drills’.	Nil.
5.	000076	SNPL	The interval of 3 years is not sufficient for new entrant cabin crew in respect of fire-fighting.	Not accepted.	The statement is not supported. The initial training required by JAR-OPS 1.1010 combined with the conversion and differences requirements of JAR-OPS 1.1010 provides for comprehensive fire fighting training for new entrant cabin crew. <i>(Comment Number 1 also refers.)</i>	Nil.
6.	000081	SNPNC	Vital that exit operation and fire-fighting be completed yearly. Proposed that for exit operation this be achieved in the normal and	Noted.	The proposed amendment regarding the need for exit operation to be conducted in normal and emergency modes including the required actions	Nil.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			emergency modes, including the actions and forces required to operate the associated evacuation means.		and forces, is not considered to be relevant to this NPA-OPS 15 proposal. However, the Group did consider that there was some merit in this specific proposal and that it should be re-submitted through the NPA process.	
7.	000081	SNPNC	It is proposed to change the three yearly requirement for life-raft training from a demonstration of the equipment to the actual use of the equipment.	Noted.	Not relevant to this NPA-OPS 15 proposal. The SNPNC proposal should be subject to the NPA process.	Nil.
8.	000081	SNPNC	It is proposed to amend the fire-fighting requirements to add the word <i>'actual'</i> fire.	Noted.	Not relevant to this NPA-OPS 15 proposal. The SNPNC proposal should be subject to the NPA process.	Nil.
9.	000084	ITF	Many operators conduct such training on a more frequent basis.	Noted.	The JAR-OPS 1 requirements are a <u>minimum</u> standard and do not preclude operators from providing additional training.	Nil.
10.	000084	ITF	The current proposal will lower European standards.	Not accepted.	This statement is not substantiated. The cabin crew safety standards of many JAA states has been significantly enhanced by the introduction of the JAR-OPS 1 Subpart 'O' requirements.	Nil.
11.	000084	ITF	The standard is lower than the requirements of FAR 121.	Not accepted.	The comment that the JAR-OPS 1 requirements falls below the FAR 121 requirements is not accepted. The FAA does not restrict the number of aircraft types that a cabin	Nil.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
					crew member can operate on as required by JAR-OPS 1.1030, nor does it specify a recency requirement as in JAR-OPS 1.1020. Any comparison on training intervals required by JAR-OPS 1 and FAR 121 should take into account these additional requirements of JAR-OPS 1.	
12.	000162 000291 000021	AEA DCA (Lux) Finnair	FAA requirements are not comparable with JAR-OPS 1 since in FAR 121.417 there is no restriction on the number of aircraft types nor is there any criteria for recency.	Noted.	It is agreed that the FAA does not restrict the number of aircraft types that a cabin crew member can operate on as required by JAR-OPS 1.1030, nor does it specify a recency requirement as in JAR-OPS 1.1020. Any comparison on training intervals required by JAR-OPS 1 and FAR 121 should take into account the additional requirements of JAR-OPS 1.	Nil.
13.	000084	ITF	The current requirement is not compliant with criteria contained in the ICAO Cabin Attendant Safety Training Manual.	Noted.	Compliance with the very detailed guidance in the ICAO Cabin Attendant Training Manual is not mandatory for ICAO Contracting States. It is ICAO Annex 6, Chapter 12 that requires compliance and this is achieved by JAR-OPS 1 Subpart 'O'.	Nil.
14.	000084 000081	ITF SNPNC	A complete review could be conducted to establish precise and specific requirements for the recurrent training items listed.	Noted.	The JAA NPA OPS 15 letter dated 25 th June 1999 states that <i>"It was agreed that the FCCCSG would in due course, return to the task of</i>	Nil.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
					<p><i>reviewing para. (c) of the Appendix. An interim minor change is included in this NPA in order to invite comment and the FCCCSG will return to the discussion when comments have been received". This item had been reviewed in-depth by the Group in 1997 and the majority of the Group considered that any such proposal from the cabin crew organisations should be subject to the NPA process. The cabin crew organisations did not agree with this position.</i></p> <p>There would appear to be no movement by the majority of the Group to reduce the frequency of three yearly recurrent training requirement. However, there was some degree of support for reviewing the detail of the actual training requirements in order to determine if specific enhancements might be made, (<i>eg item 6 above</i>).</p>	
15.	000162 000291 000021	AEA DCA (Lux) Finnair	The current requirement to remain unchanged at 3 years as outlined in the NPA-OPS 15 proposal.	Noted.	The majority of the Group accepted this comment but this position was not agreed by the cabin crew organisations.	Nil.
16.	000162 000291 000021	AEA DCA (Lux) Finnair	The JAA FCCCSG have conducted a review of JAR-OPS 1 against ICAO and have concluded that JAR-OPS 1 requirements are well above the	Noted.	It is confirmed that the FCCCSG (Subpart 'O' Group) conducted a comprehensive review in 1997 of the JAR-OPS 1 Subpart 'O'	Nil.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			standards of ICAO Annex 6, Chapter 12.		requirements in relation to the ICAO requirements specified in ICAO Annex 6, Chapter 12. This review clearly identified that JAR-OPS 1 Subpart 'O' exceeds the ICAO requirements of Annex 6, Chapter 12. One shortfall was identified in respect of JAR-OPS 1.1010 which NPA-OPS 15 proposes to amend by requiring that Conversion and Differences training be 'approved' by the Authority.	
17.	000162 000291 000021	AEA DCA (Lux) Finnair	The JAA OC discussed this issue taking into account the JAA FCCCSG review of JAR-OPS 1 and ICAO Annex 6, and determined that the 3 year criteria be retained.	Noted.	The JAA OC discussed this at OC 2/99 and determined that NPA-OPS 15 included an explanatory text. The subject would be revisited when comments were received. <i>(Comment Number 16 also refers.)</i>	Nil.
18.	000162 000291 000021	AEA DCA (Lux) Finnair	Changing the requirements in this respect would result in a considerable cost impact to the disadvantage of JAA operators.	Noted.	There is no doubt that increasing the frequency of training would directly result in an increase in the industry's training costs. It was noted that AEA have not substantiated the level of cost increase.	Nil.
19.	000162 000291 000021	AEA DCA (Lux) Finnair	Future changes to JAR-OPS cabin crew recurrent training requirements should be based on well founded and comprehensive cost safety benefit studies.	Noted.	This is a matter for JAA Headquarters in conjunction with the JAR 11 Rule Making Procedures for CBA (Cost Benefit Assessment).	Nil.
20.	000162 000291	AEA DCA (Lux)	Accident analysis does not provide tangible proof that reducing intervals	Accepted.	No evidence has been submitted regarding in-service incidents or	Nil.

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
	000021	Finnair	between recurrent training will improve safety.		accidents in respect of a shortfall in cabin crew actions resulting from any inadequacy in the frequency of cabin crew recurrent training. (Comment Number 5 also refers.) No accident recommendation could be identified proposing that exit training and/or fire training be undertaken at more frequent intervals than the current requirements. However, the cabin crew organisations were of the opinion that accident analysis does not necessarily take into adequate account the actual performance of cabin crew during emergencies.	
21.	000162 000291 000021	AEA DCA (Lux) Finnair	Most AEA airlines are already conducting more frequent additional training as required by JAR-OPS 1.	Noted.	No further comment.	Nil.
22.	000162 000291 000021	AEA DCA (Lux) Finnair	AEA airlines comply with JAR-OPS as a minimum and are satisfied with the results of their training programmes.	Noted.	No further comment.	Nil.

JAR-OPS 1.1030 OPERATION ON MORE THAN ONE TYPE OR VARIANT

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1.	000082 000086	SNPNC ITF	Primary importance that variants be considered as different types if differences in any of the 3 aspects (door operation, location and type of	Partially accepted.	The Group recommends that the text be amended to read “..... <i>in each of the three following aspects</i> ”. Such an amendment will not in any way	<i>JAR-OPS 1.1030, Paragraph (b)</i> “.....in each of the following aspects.....” .

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			portable equipment & type specific procedures). The current wording could be mis-interpreted.		affect the applicability of the rule but may go some way to clarify the requirement.	
2.	000083 000224 000090	SNPNC DGAC (France) ITF	Proposal to specify exactly what is meant by the different types of specific emergency procedures.	Noted.	The current listing of emergency procedures is not intended to be exhaustive. The most important aeroplane type specific emergencies have been listed in the NPA-OPS 15 proposal.	Nil
3.	000178 000225 0000087 000083	ICCA DGAC (France) ITF SNPC	When changing aircraft types during a series of sectors the cabin crew briefing required by AMC OPS 1.210 should be complemented by information such as safety equipment, relevant to the specific types to be operated.	Accepted.	Since safety equipment may differ between aeroplane types to be operated during a series of flights, the Group recommends that that text be amended to read “..... normal and emergency procedures and safety equipment applicable to the actual aeroplane types to be operated ”.	<i>IEM OPS 1.1030, Paragraph 4 “...normal and emergency procedures and safety equipment applicable to the actual aeroplane types to be operated”.</i>
4.	000082 000086	SNPNC ITF	Cabin crew members should have minimum experience level on one aircraft type before commencing training on another aircraft type.	Not accepted.	The Group considered that this was unnecessary. The NPA comment is not substantiated.	Nil
5.	000082 000086 000170	SNPNC ITF ICCA	Cabin crew operating on more than one type must comply with all Subpart ‘O’ requirements for each aircraft type.	Noted.	This is already required by other sections of JAR-OPS 1, eg JAR-OPS 1.988 and JAR-OPS 1.175 (j) and (k).	Nil
6.	000170	ICCA	For operations on more than one aircraft type, the operator shall specify appropriate procedures and	Noted.	This is already addressed in JAR-OPS 1 Subpart ‘P’ (Appendix 1 to JAR-OPS 1.1045 A 5).	Nil

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
			restrictions in the OM and that these be approved by the Authority.			
7.	000170	ICCA	Minimum experience levels should be taken into account when designating a new entrant cabin crew member to a new aircraft type.	Noted.	The criteria for familiarisation is specified in JAR-OPS 1.1012 and already addresses this issue. For the first aircraft type to be operated cabin crew complete supernumerary flights and must be in addition to the minimum number of required cabin crew.	Nil
8.	000169	ICCA	IEM OPS 1.1030 should refer to IEM OPS 1.280 in respect of seat restrictions at emergency exits.	Not accepted.	The Group did not accept the need for a cross-reference. There are many cross-references that could be included in Subpart 'O', and in the other JAR-OPS 1 Subparts, but this is not considered necessary.	Nil

Subpart P

Item	Comment Number	Commentor	Summary of Comment	Operations Committee Response	Reason for the Response	Resulting change to NPA text
1	107	ORCG	App 1 to 1.1045 11(a); suggests inserting a 'type and level' of occurrence	Not agreed	The form of words suggested does not match anything in 1.420. Occurrences are categorised but without a level or type.	--
2	022 026 107 163 292	DGAC Lx AEA Finnair ORCG	Para. 11(b) of the Appendix; suggestions that the forms themselves should be in the Ops Manual and that other occurrences should be added after incidents and accidents	Agreed		Text amended to incorporate these suggestions
3	077	SNPL	App 1 to 1.1045 para A. 2.5 Inflight inspections should only be performed by qualified airline captains employed by the authority	Noted	Considered to be a matter for JIP	-
4	055	IFALPA ECA	Para A.2.5 ...authorised personnel in accordance with ICAO doc 8335	Noted	Considered to be a matter for JIP	-
5	199	Monarch	Para A 13 (i) text too vague (ii) change number from A 13 to A 1 or A 16	Partly Agreed Not Agreed	The amended text makes this clear Comment is not clear	...operational arrangements for leasing, associated procedures and management responsibilities -
6	254	ERA	Para A 13 Remove para as it is of no importance for day to day operations	Not Agreed	There are important operational implications	