

NPA-OPS-21

COMMENT RESPONSE DOCUMENT

Key: NA = Not Agreed; A = Agreed; AP: Agreed Partially; N = Noted;

Par No. JAR-OPS	Comment No.	Author	Country	Comment	Position (see key *)	Justification	Text
General	000001	ScotAirways	UK	No comment	N		
AMC OPS 1.945, 4.4	000002	CAA	Iceland	Proposal to amend text in order to harmonise between OPS and FCL: the training should include at least 3 4 or 6 take-offs and landings in the aeroplane <i>depending on the experience of the pilot, in accordance with JAR-FCL.</i>	NA	No minimum number of landings are specified for type rating training within JAR-FCL. The words 'at least' in the JAR-OPS text do cover the content of this proposal.	
JAR-OPS 1.005(e)	000003	CAA	Iceland	New text proposed: <i>All type or Class rating instructors, synthetic flight instructors, type or class rating examiners and synthetic flight examiners are to be qualified i.a.w. JAR-FCL</i>	NA	Reference should be JAR-OPS 1.005(f). This new paragraph refers to devices and not human beings. The proposal is covered under JAR-FCL. References to other JARs not yet annexed to EU CR 3922/91 should be avoided (EU OPS!)	
General	000004	Birmingham International Airport	UK	No comment	N		
General	000005	Go Fly Ltd.	Italy?	No comment	N		
General	000006	CAA	Denmark	Agreement with the proposal to correct FTD Levels to Arabic numerals	A		Text under AMC OPS 1.980 1.2.d.i, 1.2.d.ii, and AMC OPS 1.980(b), 6, table 4 C and D: Level 1 and 2
General	000007	CAA	Finland	Agree without comment	N		
JAR-OPS 1.005(f)	000008	LFV	Sweden	Propose to add following text: <i>STD approved by the American Federal Aviation Administration</i>	AP	NPA text will be changed to: ...All STD ...are to be qualified in accordance with JAR <i>the applicable</i> STD	

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				<i>(FAA) may be accepted by the Authority as being equivalent to JAR-STD requirements.</i>		requirements... This should cover the proposal.	
JAR-OPS 3.005(j)	000009	LFV	Sweden	It is proposed to add the identical text as provided under comment 8	AP	The same change will be applied as under comment 8	
AMC OPS 3.945, 1.1 c.	000010	LBA	Germany	Proposal to keep the term 'Flight Simulator' instead of STD	NA	Certain parts of training (e.g. for Category A) are probably possible in an FNPT II or III, for which the requirements are under development (JAR-STD 3H)	
AMC OPS 3.945 1.1 a.	000011	LBA	Germany	Proposal to delete the words 'or other training devices'	A	The JAR-STD WG has agreed to delete the term 'other training devices' in the progress of developing JAR-STD 1H. The other JAR-STD documents will be adapted eventually. This means that all training devices such as FS, FTD, FNPT are to be covered under STD and all other devices are to be clearly explained in detail.	
[APP 1 to JAR-OPS 3.955(a)(1)(i)	000012	LBA	Germany	Proposal to keep the term Flight Simulator instead of introducing STD	NA	Part of this training may be done in an FTD, whenever available. Requirements for helicopter FTD are planned to be developed based on the recognised needs.	
AMC OPS 1.980/980(b)	000013	LBA	Germany	Proposal to delete the term 'qualification'	A	Term 'qualification' deleted as redundant. An FTD has the Qualification Levels: 'Level 1' or 'level 2'.	Example: JAR-STD 2A, Level 2
AMC OPS 1.945, 4 headline and 4.2, line 1	000014	LBA	Germany	Keep term 'Flight Simulator' as requirement deals with flying training	NA	Training of such kind may be performed in a Flight Simulator and also, partially, in a Flight Training Device (such as LOFT)	
App 1 to JAR-OPS	000015	LBA	Germany	Proposal to change	A		New title: Aeroplane/ STD

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1.965(a)(2)				content of title from Flight Simulator to STD in order to align title with following text			training
JAR-OPS 1.955(b)(1)	000016	LBA	Germany	Proposal to keep the term Flight Simulator instead of STD	NA	Training of such kind may be performed in a Flight Simulator and also, partially, in a Flight Training Device (such as LOFT)	