

**NPA 20-6 issue 2; ACJ 20-XX Occurrence Reporting: Comment - Response Document**

<b>Comment No. &amp; commentor</b>	<b>ACJ 20-xx paragraph</b>	<b>Comment (summary)</b>	<b>ORCG position</b>	<b>Changes to text</b>
2 Fokker Services	-	comment on 21-24	Not a comment on 20-6	None
1 CAA-Denmark	general	agree	Noted	None
21 AEA	general	no comments	Noted	None
20.1 MD	general	ACJ in 20-series is not easy to find and will bring more costs.	Agreed. The ACJ will be made available as part of JAR-145	None
20.3 MD	general	ACJ refers to other sources of information	Yes, but in principle only for manufacturers who need this guidance already. If Maintenance organisations would need to go to this level of detail they would be expected to consult the TC holder, who will have the necessary documents.	None
20.4 MD	general	Difficult to identify who has to report to whom	Partly agreed. The requirements define the criteria for reporting. The ACJ provides guidance to this. It could be further improved by encouraging the feedback from Design Approval holders to inform maintenance organisations through the Maintenance Manual on what type of occurrence they need information. This is believed to be covered by JAR 21.3(a), but may need further guidance.	None
22 LFV	general	In favour of proposal, however it is essential that a feedback system is established.	Noted. The request is understood but outside the scope of the NPA's. Periodic statistical reports could easily be provided using the ECCAIRS software. The matter of analysing the occurrence reports is taken up by the JSSI.	None
5 LBA	general	the ACJ only addresses organisations, where also persons should be addressed	Comment agreed, but the proposed solution is not agreed. In stead it is proposed to add a new subparagraph in 2, to explain that where the term 'organisation' is used you may also	New 2 b) In most cases the obligation to report is on the holders of a certificate or approval, which in most cases are organisations. Therefore this ACJ is written

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			read 'person'.	under that assumption. However in some cases they may be single persons. Also some reporting requirements are directed to persons. In order not to complicate the text, only the term 'organisation' is used, but persons are also addressed.
OD 1	general	there is no mention of feedback system	Noted. The request is understood but outside the scope of the NPA's. This matter is taken up by the JSSI	None
OD 6	general	see also NPA-OPS-15	Agreed; need to check the ACJ against the latest amendment of JAR-OPS-1 (and 3) for compatibility.	
6 LBA	6.c.i	Delete 'by the reporter'	Agreed, also for internal consistency in the ACJ.	6.c) i) Where an occurrence is judged by the reporter to have resulted.....'
11 LBA	7.a	add an additional item: 'actions taken'	Not agreed. This will not be applicable for the bulk of the reports coming from the operators, so it does not qualify as information that should 'at least' be included. Moreover it is mentioned already in ACJ 20.xx paragraph 4.a)v).	None
7 LBA	7.a.ii	add approval reference	Agreed	add new 7.a) ii) 'approval reference if relevant'
8 LBA	9.b.iv	editorial	Agreed	9.b)iv) Joint Parts Approval
3 CAA-UK	10.a	disagrees with the statement that the authority does not need to receive the same reports from a design organisation as from an operator.	Gist of the comment agreed; the current text appears to be misunderstood and could therefore be improved	'For example the authority <del>does</del> <u>will</u> not need to receive the same kind of reports from a design organisation as from an operator. <del>That is because operators are a primary source of occurrence information and designers normally are not.</del> <u>This is a reflection of the different perspectives of the organisations based on their activities.</u>
23 CC	10.a	disagrees with the statement that the authority does not need to receive the same reports from a design organisation as from an operator.		

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12 LBA	10.a figure 1	graphic as per working paper 14.2 should remain	Not agreed. Graphic is too complex	None
4 CAA-UK	10.b, c and d	editorial	Agreed	b) '....to provide guidance <del>ef</del> for those persons....' c) '....designers will normally perform some kind of analysis....' d) to an unsafe condition, <u>should</u> a report <del>should</del> be made....'
9 LBA	10.g	ACJ gives too much room for interpretation on which occurrences should be reported	Not agreed. The reporting criteria are given in the relevant requirements and are repeated in the ACJ. There is intentionally room for judgement (see ACJ 20-xx paragraph 10). See also response to comment No. 10 below.	None
20.2 MD	10.g	ACJ is too detailed and all encompassing	Not agreed. The ACJ is not a compulsory list. It is intended to provide guidance for organisations to establish their own customised list. Therefore they can determine the level of detail themselves. This may not be clear enough in the ACJ and therefore the explanation on how the list should be used in the ACJ will be improved and could be further explained in Temporary Guidance if deemed necessary by the MD	New first sentence in 10.g: 'The following is a generic list. Not all examples are applicable to each reporting organisation. In addition, some organisations may prefer a less detailed list. Therefore each organisation should define and agree with the Authority a specific list of reportable occurrences or a list of more generic criteria, tailored to its activity and scope of work (see also 10.e above). In establishing that customised list, the organisation should take into account the following considerations.'
10 LBA	10.g	indicate which organisation has to report a certain type of occurrence	Not agreed. This is already clearly stipulated in the requirements. The whole purpose of the ACJ to be applicable to all kinds of organisations is to encourage a common culture of reporting. It will be beneficial if you broaden your view on aviation safety, to know which problems can occur in other areas. Moreover, it is not always very clear who has to report a certain occurrence. In those cases it is better to receive double	None

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			reports in stead of no report at all.	
13 LBA	10.g	Distinction should be made between maintenance and operations: examples should be in separate lists as per the different responsibilities for reporting divided by type of occurrence and time of occurrence	Not agreed. The criteria for reporting are stipulated in the relevant requirements (JAR-OPS 1.420(b)(2) and JAR 145.60(a)(new)). Operators/commanders have to report in relation to operations and JAR-145 organisations report only those conditions <b>they</b> have identified.	None
14 LBA	10.e	Need to specify where the customised list needs to go	Not agreed. It is up to the approval holder to determine where to keep such list. In 10.e it is suggested to be included in the organisation's manuals.	None
15 LBA	10.g	need to clarify where list of reportable occurrences is established and relation with Annex 1 needs explanation.	The first remark is not understood and the second is already addressed in ACJ 20.xx paragraph 10.g.II.B. under item 15. The list can be customised and Annexes may be added if so desired.	None
OD 5	10.g	Add misloading of fuel	Is addressed by IV.B.2)	None
OD 3	10.g I.A	what about poor meteorological forecasting	Is addressed by IV.A.1)	None
OD 2	10.g I.A.8	This would include turbulence, is that the intention	Yes, it is intended to include turbulence ("from any cause")	None
OD 4	10.g IV.B	Add de-icing procedures	Agreed	Add a new item under IV.B: 3.) unsatisfactory ground de-icing / anti-icing
18 LBA	10.g Annex 1	reinstate the failure of flight recorders.	'failure of flight recorders' has been deleted because it does not comply with the criterion for reporting as stipulated in the requirement: endangered or could endanger the safety of operation. This information could be found elsewhere.	None
19 FOCA	10.g II and III	review Annex 1 and section III in its entirety as some items do not constitute a flight hazard	Not agreed. Commentor has not understood the intent, as explained in paragraph 10, however the explanation could be improved. Commentor has also not understood the structure of the list; II.B. contains a list a	10.g) after second paragraph: A lot of the qualifying adjectives like 'significant' have been deleted from the list. In stead it is expected that all examples are qualified by the reporter using the general

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			general criteria for systems, and Annex 1 provides a list of example reportable occurrences on systems.	criteria that are applicable in his field, and specified in the requirement. (e.g. for operators: hazards or could have hazarded the operation')
16 LBA	10.g. II	Introduction implies that these occurrences do not need to be reported by operator or maintenance organisation.	Partly agreed.	Generalise the introductory sentence and move to the top of the list/bottom of 10.g. See response to comment No. 20.2 above
17 LBA	10.g. II	various detailed comments	Difficult to respond to this comment; commentor is referring to previous versions of the NPA	None