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<b>Title</b>	Amendment of the requirements for flight recorders and underwater locating devices: CSs/AMC/GM for locating an aircraft in distress
<b>NPA Number</b>	NPA 2020-03

**UK CAA** (European.Affairs@caa.co.uk) has placed **11** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
284	(General Comments)	0	<p>General</p> <p><b>Comment:</b> Many of the AMC items proposed in this NPA regarding the requirement for location of an aircraft in distress appear to impose additional requirements that are not relevant to compliance with CAT.GEN.MPA.210.</p> <p><b>Justification:</b> CAT.GEN.MPA.210 Location of an aircraft in distress only requires a robust and automatic means to accurately determine, <i>following an accident during which the aircraft is severely damaged</i>, the location of the end point of the flight.</p> <p>We recommend a review of the AMC and CS requirements for applicability against the IR.</p>	
285	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> AMC1 CAT.GEN.MPA.210 Location of an aircraft in distress — Aeroplanes PERFORMANCE AND PROCEDURES (c)</p> <p><b>Comment:</b> The UK CAA recommends using two sentences to describe the operator's obligation to highlight the implications of unjustified manual activation.</p>	

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			<p><b>Justification:</b> Clarity</p> <p><b>Proposed Text:</b> Amend as follows:</p> <p>`(c) `...These procedures should require manual activation only when the flight crew needs to declare a state of emergency to the ATS. <del>and they</del> <b>The operator</b> should highlight the implications <b>for search and rescue authorities</b> of unjustified <b>false alert</b> manual activation <del>for search and rescue authorities.</del></p>	
286	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 12</p> <p><b>Paragraph No:</b> AMC1 CAT.GEN.MPA.210 Location of an aircraft in distress — Aeroplanes PERFORMANCE AND PROCEDURES (e)</p> <p><b>Comment:</b> The UK CAA recommends using the term “false alert” rather than ‘undesirable’ or ‘nuisance’.</p> <p><b>Justification:</b> Clarity and consistency</p> <p><b>Proposed Text:</b> Amend as follows:</p> <p>`(e) Limiting the effects of undesirable <b>false alerts</b> system activation</p> <p>The operator should establish procedures for informing without delay the relevant ATS unit(s) when an aircraft on which the system is activated is not in a distress situation (e.g. in the case of nuisance <b>false alert</b> activation of the system or successful recovery from a distress situation). In addition, to reduce the frequency and effects of undesirable <b>false alert</b> system activation, the operator should:</p> <ol style="list-style-type: none"> <li>(1) establish procedures for disabling the system after completion of the flight;</li> <li>(2) consider the system inoperative if nuisance <b>false alert</b> activation occurs several times during a flight or if the system is disabled because of nuisance <b>false alert</b> activation; and</li> <li>(3) analyse undesirable <b>false alert</b> system activation to determine the probable cause, and retain records of such analyses for at least 12 months.’</li> </ol>	

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287	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 15</p> <p><b>Paragraph No:</b> GM1 CAT.GEN.MPA.210 Location of an aircraft in distress — Aeroplanes OBJECTIVES (a)</p> <p><b>Comment:</b> Consider revising paragraph (a) as proposed below for readability and clarity</p> <p><b>Justification:</b> Clarity and accuracy of the purpose of the requirement to have ADT</p> <p><b>Proposed Text:</b> Amend as follows:</p> <p><del>'(a) The purpose of CAT.GEN.MPA.210 is to increase the likelihood that an accident site will be accurately and quickly located probability of identifying establishing the location of the accident site quickly and accurately, anywhere in the world, and irrespective of the accident survivability (hence, the terms 'automatic', 'robust', and 'accurately' are used in CAT.GEN.MPA.210). This also implies that requires the stakeholders concerned are quickly to be informed quickly that an accident has (or is about to) occurred or is about to occur. One of the <b>The</b> main objectives of CAT.GEN.MPA.210 is to deliver provide data to the competent SAR centre, which they can easily be used to timely and accurately locate the accident site (hence, the terms 'automatic', 'robust', and 'accurately' are used in CAT.GEN.MPA.210). Other important objectives of CAT.GEN.MPA.210 are to make this data available to the ATS unit providing the alerting service in the airspace where the aircraft is indicated to be by this data, and to locate the aircraft within a reasonable time frame for the purpose of a safety investigation.'</del></p>	
289	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 16</p> <p><b>Paragraph No:</b> GM2 CAT.GEN.MPA.210 Location of an aircraft in distress — Aeroplanes EXPLANATION OF TERMS "accident during which the aeroplane is severely damaged ..."</p>	

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			<p><b>Comment:</b> It is suggested that the spelling of the word "tire" be amended to 'tyre'</p> <p><b>Justification:</b> Accuracy</p> <p><b>Proposed Text:</b> Replace "tires" with 'tyres'.</p>	
290	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 16</p> <p><b>Paragraph No:</b> GM2 CAT.GEN.MPA.210 Location of an aircraft in distress — Aeroplanes EXPLANATION OF TERMS "<b>nuisance activation ...</b>"</p> <p><b>Comment:</b> The UK CAA recommend changing the use of the term "nuisance activation" to 'false alert'</p> <p><b>Justification:</b> Recognised aviation terminology</p> <p><b>Proposed Text:</b> Amend as follows:</p> <p>- '<del>nuisance activation</del> <b>'false alert'</b> refers to an automatic activation of the airborne system that is not desirable intended as it does not correspond to an accident condition within the scope of CAT.GEN.MPA.210;'</p>	
295	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 17</p> <p><b>Paragraph No:</b> AMC2 CAT.IDE.A.280 Emergency locator transmitter (ELT) (a)(3)</p> <p><b>Comment:</b> The term "hydrostatic" has been replaced by 'water'. It is suggested that a better term would be "Immersion" which covers the intent which is to detect entry into or below water and not just water.</p> <p><b>Justification:</b> Clarity of intent and interpretation</p> <p><b>Proposed Text:</b> Replace "water sensors" with 'immersion sensors'</p>	

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308	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.2. Draft AMC & GM to Part-CAT	11 - 21	<p><b>Page No:</b> 20</p> <p><b>Paragraph No:</b> AMC2 CAT.IDE.H.280 Emergency locator transmitter (ELT) (a)(3)</p> <p><b>Comment:</b> The term “hydrostatic” has been replaced by ‘water’. It is suggested that a better term would be “Immersion” which covers the intent which is to detect entry into or below water and not just water.</p> <p><b>Justification:</b> Clarity of intent and interpretation</p> <p><b>Proposed Text:</b> Replace “water sensors” with ‘immersion sensors’</p>	
383	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.4. Draft AMC & GM to Part-NCO	23 - 25	<p><b>Page No:</b> 24</p> <p><b>Paragraph No:</b> AMC2 NCO.IDE.H.170 Emergency locator transmitter (ELT) (a)(3)</p> <p><b>Comment:</b> The term “hydrostatic” has been replaced by ‘water’. It is suggested that a better term would be “Immersion” which covers the intent which is to detect entry into or below water and not just water.</p> <p><b>Justification:</b> Clarity of intent and interpretation</p> <p><b>Proposed Text:</b> Replace “water sensors” with ‘immersion sensors’</p>	
385	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.5. Draft AMC & GM to Part-SPO	26 - 28	<p><b>Page No:</b> 27</p> <p><b>Paragraph No:</b> AMC2 SPO.IDE.H.190 Emergency locator transmitter (ELT) (a)(3)</p> <p><b>Comment:</b> The term “hydrostatic” has been replaced by ‘water’. It is suggested that a better term would be “Immersion” which covers the intent which is to detect entry into or below water and not just water.</p> <p><b>Justification:</b> Clarity of intent and interpretation</p>	

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			<p><b>Proposed Text:</b> Replace "water sensors" with 'immersion sensors'</p>	
386	3. Proposed amendments and rationale in detail — 3.2. Draft AMC and GM (Draft EASA decision) — 3.2.6. Draft AMC & GM to Part-CNS	28 - 31	<p><b>Page No:</b> 28</p> <p><b>Paragraph No:</b> AMC1 CNS.OR.100 Technical and operational competence and capability COMPETENCE OF THE SURVEILLANCE PROVIDER (TRANSMISSION SERVICE FOR THE LOCATION OF AN AIRCRAFT IN DISTRESS) (a)</p> <p><b>Comment:</b> It is recommended that the reference to ADT automatically making the data available to the relevant ATS and SAR units is deleted.</p> <p><b>Justification:</b> The ICAO Standard 6.18.1 requires the aeroplane to be able to transmit its position autonomously to the operator. It is the operator's responsibility to make the information received available to the appropriate organisations. The text in CAT.GEN.MPA.210 only requires the aeroplane to be equipped with the means to determine the location of the end point of the flight</p> <p><b>Proposed Text:</b> Amend as follows:</p> <p>(a) The transmission service means a distribution service that automatically delivers data corresponding to signals transmitted by an airborne system to the competent SAR centre and that automatically makes this data available to the relevant ATS unit, for the purpose of CAT.GEN.MPA.210 'Location of an aircraft in distress' (refer to Annex IV (Part-CAT) to Regulation (EU) No 965/2012). The transmission service has priority over the other services that are provided by the surveillance provider.</p>	