

	Name: UK CAA		
Document	Reference	Proposal / comment	Justification
<i>Addendum to Cover Regulation on Air Operations (CRD b.1)</i>	Article 1 paragraph 2	At reference to "9. By way of derogation..." subparagraphs (a) and (b) mention the operating Annexes that Training Organisations must follow for motor-powered aircraft but do not mention what rules they should apply for Sailplane and Balloon training. This is presumably Annex VII but it recommended that the appropriate reference be considered and inserted here.	Clarification of operating rules for sailplane and balloon training organisations.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
<i>Explanatory Note to CRD OPS II (CRD a.1)</i>	Paragraphs 74 and 187	<p>Comments requested on the selection criteria for isolated aerodromes for helicopter operations. It may be helpful to determine a standard interpretation of an isolated destination for helicopters for Part-CAT, PART-NCC and Part-NCO but it is recommended that this is done by a new rulemaking group to fully consider the options.</p> <p>In the meantime, the UK CAA has recommended that NCC.OP.157(b) and NCO.OP.146(b) be amended slightly to apply the point of no return to all isolated destinations and not just for 'offshore'.</p>	N/A
	NCC.OP.220 Airborne collision avoidance system (ACAS)	Additional alignment with AUR.ACAS is noted and welcomed.	Observation
	NCC.IDE.A/H.140 Airborne collision avoidance system (ACAS)	Alignment with NCC.OP.220 is noted and welcomed	Observation
	Paragraph 151	Comments requested regarding the inclusion of additional Equipment Requirements for Part-NCC helicopters operating over the water by alignment to Part-CAT. Whilst the principle is partially supported there is no firm justification given or any measure made to provide for proportionate introduction of such standards. The proposal places severe and costly restrictions on non-commercial operators. A more	The proposal to align Part-NCC with Part-CAT in this area is disproportionate and not fully justified. The number of Part-NCC helicopters conducting 'offshore operations' in hostile environments is considered to be extremely low and it would be more appropriate to

	Name: UK CAA		
Document	Reference	Proposal / comment	Justification
		<p>appropriate and proportionate way would be to transfer the majority of the sections to AMC or GM allowing the operator to make a risk assessment and judgement of what he considers necessary in terms of survival equipment, life rafts and so on. This principle is evident in the IDE.A equivalent sections. Requiring PART-NCC helicopters to be certified for ditching could prevent some from continuing to operate.</p> <p>Detailed proposals will be made in the relevant sections</p>	<p>allow the operator to conduct his own risk assessment and adopt sensible measures using suitable AMC and GM. The frequency and scale of these kind of operations cannot be compared with offshore Part-CAT operations.</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
Resulting Text to Part-NCC (CRD b.2)	Part-NCC	<p>Throughout Part-NCC reference is made to helicopters operating in Performance Classes 1, 2 or 3. However, performance classes are only defined and relevant to Part-CAT operations as no such performance requirements are laid down for Part-NCC or even Part-NCO.</p> <p>Therefore throughout Part-NCC, where operations in performance classes are mentioned, the text needs to be re-written, with PC being removed, to be consistent and proportionate with the intended requirement.</p> <p>Other reactions made in response to this CRD have not specifically addressed this general proposal but have been based on the supplied draft text.</p>	Accuracy, consistency and correct terminology.
	NCC.IDE.	<p>The term 'pressure altitude' used in all aircraft types IDE sections is not correct.</p> <p>Amend the term to 'barometric altitude'.</p> <p>ICAO have been informed of this error in Annex 6.</p>	Correct terminology.
	NCC.GEN.120	<p>The text at sub-paragraph (b)(2) should be amended to read;</p> <p>(2) is trained licensed to use the radio telephone</p>	Use of aeronautical radio equipment requires the operator to hold a RT Licence
	NCC.OP.131 (a)(2)(i)	<p>For clarity amend text to read:</p> <p>(2) for IFR flights:</p> <p>(i) when no alternate is required or no</p>	Clarity of intent and alignment with text in following paragraph.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<i>weather-permissible alternate aerodrome is available</i>, to fly to the aerodrome/operating site of intended landing, and thereafter to fly for 30 minutes at holding speed at 450 m (1 500 ft) above the destination aerodrome/operating site under standard temperature conditions and approach and land when no alternate is required or no weather-permissible alternate aerodrome is available; or	
	NCC.OP.140 (b)	For clarity amend text by inserting 'Establish procedures to...' at start of sentence. Sentence to read: Establish procedures to ensure that prior to and during taxiing, take-off and landing, and whenever deemed necessary in the interest of safety by the pilot-in-command, each passenger on board occupies a seat or berth and has his/her safety belt or restraint device properly secured; and	Clarity of intent and alignment with text in previous paragraph.
	NCC.OP.156 (a)	The rule reflects Annex 6 Part II 2.2.3.5 which does not specifically provide for an instrument approach procedure to be available (unlike by paragraph (b) and also for helicopters at NCC.OP.157(a)) by which a safe descent below MSA would be made to attain the approach and landing under VMC. It is therefore suggested that the text is amended to read: (a) an instrument approach procedure is prescribed for the aerodrome of intended landing and the available current meteorological information indicates that, for the period from 1 hour before until 1 hour after the estimated time of arrival, or from the actual	Clarity and safety of intended operation under IFR albeit the approach and landing must be in VMC.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		time of departure to 1 hour after the estimated time of arrival, whichever is the shorter period, the approach and landing may be made under visual meteorological conditions (VMC);	
	NCC.OP.157	<p>It is proposed that a similar option for helicopters be inserted to align with the aeroplane option at NCC.OP.156(a) as amended by CAA UK added proposal.</p> <p>(a) <i>an instrument approach procedure is prescribed for the aerodrome of intended landing and the available current meteorological information indicates that, for the period from 1 hour before until 1 hour after the estimated time of arrival, or from the actual time of departure to 1 hour after the estimated time of arrival, whichever is the shorter period, the approach and landing may be made under visual meteorological conditions (VMC);</i></p> <p>Renumber subsequent sub-paragraphs.</p>	Alignment and practical utilisation.
	NCC.OP.157 (b)	<p>There is no time period assigned to this rule as in other parts. It is proposed that the same principle as used in NCC.OP.156 (b) be applied for helicopters. Additionally, sub-para (4) is amended to apply PNR to all isolated destinations.</p> <p>Amend (b) to read:</p> <p>(b) the place of intended landing is isolated and:</p> <p>(1) an instrument approach procedure is</p>	Alignment and safety of intent.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>prescribed for the aerodrome of intended landing;</p> <p>(2) available current meteorological information indicates that the following meteorological conditions will exist from 2 hours before to 2 hours after the estimated time of arrival:</p> <p>(2i) the cloud base is at least 120 m (400 ft) above the minimum associated with the instrument approach procedure;</p> <p>(3ii) visibility is at least 1 500 m more than the minimum associated with the procedure; and</p> <p>(43) a point of no return (PNR) is determined in case of an offshore destination.</p>	
	NCC.OP.205(a)	<p>The text as written places a difficult requirement on the operator to ensure 'in-flight fuel checks are performed'. The operator should be required to ensure that fuel check procedures are established and it is the pilot in command's responsibility to carry them out. Proposed revised text is:</p> <p>(a) The operator shall ensure that in-flight fuel checks and fuel management are performed.</p> <p>(a) The operator shall establish in-flight fuel check and fuel management procedures.</p>	Clarity of purpose.
	NCC.OP.220(b)(2)	<p>Currently the sentence is unclear, since it does not seem to have a noun governing the verb.</p>	Clarification

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		Change to: “(2) as soon as permitted by flight crew workload, the pilot flying shall notify ...”	
	NCC.POL.115 (b)	This is a requirement under the Rules of the Air. It is proposed that paragraph (b) be deleted.	This requirement is in SERA Part A para 3.1.2.1. Guidance on the meaning of ‘open air assembly’ is being created by the SERA Working Group.
	NCC.IDE.A.100	As written, it is not clear which items are required to be approved. Amend to read: (a) Instruments and equipment required by this Part shall be approved in accordance with the applicable airworthiness requirements if they are: (1) used by the flight crew to control the flight path; or (2) used to comply with NCC.IDE.A.245 (3) used to comply with NCC.IDE.A.250; or (4) installed in the aeroplane.	Clarification of intent
	NCC.IDE.A.125 (g)	The need for “A second independent means of measuring and displaying altitude unless already installed to comply with (e)” should be de-linked from sub-paragraph (e) as this is a different requirement. Amend paragraph to read: (g) A second independent means of measuring	Correction of requirements and alignment with Annex 6 Part II 3.6.5.1.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		and displaying altitude unless already installed to comply with (e).	
	NCC.IDE.A.140 Airborne collision avoidance system (ACAS)	Should NCC.IDE.A.140 specify the ACAS II logic version as is the case with AUR.ACAS? AUR.ACAS.1005 The following turbine-powered aeroplanes shall be equipped with collision avoidance logic version 7.1 of ACAS II: (a) aeroplanes with a maximum certificated take-off mass exceeding 5 700 kg, or (b) aeroplanes authorised to carry more than 19 passengers.	Clarification
	NCC.IDE.A.160	Annex 6 now provides for meeting CVR requirements by use of Cockpit Audio Recording Systems (CARS) using the specifications from EUROCAE ED-155 or equivalent documents. Consideration should be given to aligning this rule with Annex 6	Alignment with the requirements of Annex 6 Part II, 3.6.3.2.
	NCC.IDE.A.165	Annex 6 now provides for meeting some FDR requirements by use of Aircraft Data Recording Systems (ADRS) using the specifications from EUROCAE ED-155 or equivalent documents. Consideration should be given to aligning this rule and its AMCs with Annex 6.	Alignment with the requirements of Annex 6 Part II, 3.6.3.4.
	NCC.IDE.A.175	This section is in the form of a Means of Compliance and should be moved to become an AMC.	Correction of purpose or intent.
	NCC.IDE.A.180 (a)(5)	It is not clear where the compliance date of 31 December 1980 is derived from and whether any	Clarity of rule requirements.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		subsequent consequences have been identified.	
	NCC.IDE.A.185	Change to "Aeroplanes in which not all passenger seats are visible from ...".	Strictly speaking the current text (all passenger seats are not visible) means that no passenger seats are visible from the flight crew seats.
	NCC.IDE.A.195(b)(1)(i)	Change to "... in the passenger compartment will be above 14 000 ft; and".	<p>According to the current text, there are requirements to supply oxygen when the pressure altitude is:</p> <ul style="list-style-type: none"> • between 10 000 and 14 000 ft [(b)(1)(ii)] • between 14 000 and 15 000 ft [(b)(1)(i)] • between 15 000 and 25 000 ft if they can't descend in time [(b)(2)] • above 25 000 ft [(b)(2)]. <p>If they can descend quickly enough, they don't need to supply oxygen between 15 000 and 25 000 ft. So, for example, the operator may have to supply oxygen at 12 000 ft but not at 18 000 ft.</p>
	NCC.IDE.A.195(b)(1)(ii)	Change to: "10% of the passengers for any period in excess of 30 minutes when the pressure altitude in the	To be consistent with NCC.IDE.A.200(b)(1).

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		passenger compartment will be between 10 000 ft and 14 000 ft;”	
	NCC.IDE.A.200	<p>The intent of the text of paragraph (b) could be made clearer by incorporating the following suggested amendment:</p> <p>(b) Non-pressurised aeroplanes operated above flight altitudes at which the pressure altitude in the passenger compartments is above 10 000 ft shall carry enough breathing oxygen to supply:</p> <p>(1) all crew members and at</p>	Clarity of intent.
	NCC.IDE.A.205	<p>Hand fire extinguishers may become a hazard if the aircraft is conducting aerobatics. It is proposed that an alleviation is added as indicated:</p> <p>(a) Aeroplanes shall be equipped with at least one hand fire extinguisher:</p> <p>(1) in the flight crew compartment; and</p> <p>(2) in each passenger compartment that is separate from the flight crew compartment, except if the compartment is readily accessible to the flight crew.</p> <p><i>(b) notwithstanding (a), an aeroplane shall not be required to be equipped with a hand fire extinguisher if it is engaged in aerobatic flight</i></p> <p>(b) (c) The type and quantity of extinguishing agent for the required fire extinguishers shall be suitable for the type of fire likely to occur in the compartment where the extinguisher is intended to be used and to minimise the hazard of toxic gas concentration in</p>	Recognition of potential hazardous loose object in the cockpit during aerobatic manoeuvres.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		compartments occupied by persons.	
	NCC.IDE.A.220	Add a comma so that it reads "... where, in the opinion of the pilot-in-command, the take-off or approach path is ...".	Currently the sentence breaks off to a sub-clause at "where" and the main part of the sentence is not resumed.
	NCC.IDE.H.100	As written, it is not clear which items are required to be approved. Amend to read: (a) Instruments and equipment required by this Part shall be approved in accordance with the applicable airworthiness requirements if they are: <i>(1) used by the flight crew to control the flight path; or</i> <i>(2) used to comply with NCC.IDE.H.245</i> <i>(3) used to comply with NCC.IDE.H.250; or</i> <i>(4) installed in the helicopter.</i>	Clarification of intent
	NCC.IDE.H.160	Although Annex 6 Part III does not yet align with Parts I & II with regard to meeting CVR requirements by use of Cockpit Audio Recording Systems (CARS) using the specifications from EUROCAE ED-155 or equivalent documents, consideration should be given to providing similar compliance for helicopters.	Alternative method of compliance
	NCC.IDE.H.160(a)	In meeting the future CVR requirements it is proposed that the compliance mass of 7000 kg be reduced to 3175 kg to align the CVR requirement with the FDR requirement at NCC.IDE.H.165. This will also align with the Annex 6 Part III	It is not considered appropriate to require a FDR without a CVR for helicopters with a MCTOM of between 3175 and 7000 kg. The change aligns with the intent of

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>Recommendation at 4.7.1.2.3.</p> <p>Amend text to read:</p> <p>(a) Helicopters with a maximum certified take-off mass (MCTOM) of more than 7 000 kg 3175 kg and first issued with an individual CofA on or after 1 January 2016 shall be equipped with a cockpit voice recorder (CVR).</p>	the Annex 6 Part III recommendation.
	NCC.IDE.H.175	This section is in the form of a Means of Compliance and should be moved to become an AMC.	Correction of purpose or intent.
	NCC.IDE.H.180 (a)	<p>Sub-paragraph (3):</p> <p>This states a compliance date of “after 31 July 1999” for seat belts. This is taken from JAR-OPS 3.730 (a)(3) and may not be appropriate for NCC as some helicopters may not be compliant. As it stands, this rule could require retrospective fitment that has not been justified. The compliance date should be re-visited to ensure that undue burden is not imposed unintentionally.</p> <p>Sub-paragraph (6):</p> <p>It is not clear where the compliance date of “31 December 1980” is derived from and whether any subsequent consequences have been identified.</p>	Ensuring that undue burden and cost is not imposed unintentionally with unjustified compliance requirements.
	NCC.IDE.H.185	Change to “Helicopters in which not all passenger seats are visible from ...”.	Strictly speaking the current text (all passenger seats are not visible) means that no passenger seats are visible from the flight crew seats.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	NCC.IDE.H.200	<p>The intent of the text of paragraph (b) could be made clearer by incorporating the following suggested amendment:</p> <p>(b) Non-pressurised helicopters operated above flight altitudes at which the pressure altitude in the passenger compartments is above 10 000 ft shall carry enough breathing oxygen to supply:</p> <p>(1) all crew members and at</p>	Clarity of intent.
	NCC.IDE.H.205	<p>Hand fire extinguishers may become a hazard if the aircraft is conducting aerobatics. It is proposed that an alleviation is added as indicated:</p> <p>(a) Helicopters shall be equipped with at least one hand fire extinguisher:</p> <p>(1) in the flight crew compartment; and</p> <p>(2) in each passenger compartment that is separate from the flight crew compartment, except if the compartment is readily accessible to the flight crew.</p> <p><i>(b) notwithstanding (a), a helicopter shall not be required to be equipped with a hand fire extinguisher if it is engaged in aerobatic flight</i></p> <p>(b) (c) The type and quantity of extinguishing agent for the required fire extinguishers shall be suitable for the type of fire likely to occur in the compartment where the extinguisher is intended to be used and to minimise the hazard of toxic gas concentration in compartments occupied by persons.</p>	Recognition of potential hazardous loose object in the cockpit during aerobatic manoeuvres.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	NCC.IDE.H.215	<p>1) Although the Standard in Annex 6 Part III for the fitment of ELTs to GA helicopters expected compliance for all after the 1 June 2008, it is expected that many States, like the UK, have not mandated this requirement.</p> <p>It is proposed that a compliance date be applied to the requirement for the fitment of an automatic ELT in the future, which would achieve retrospective compliance, or to set a date from which new helicopters are fitted on the first issue of a Certificate of Airworthiness and accept that older ones are non-compliant.</p> <p>2) The requirement for an automatically deployable ELT at Sub-paragraph (b) is drawn from the Part-CAT requirement and is considered to be in excess of what is suitable for what will be rare operational occurrences. The helicopters should already carry an ELT(A), subject to position above, and therefore it is recommended that this requirement for an ELT(AD) be placed in AMC as equipment that 'should' be fitted conditionally rather than 'must'.</p>	<p>1) Accepting the fact that many helicopters in Europe may not meet the Annex 6 and NCC.IDE.H.215 standard and compliance will be costly and burdensome.</p> <p>2) Proportionality and recognition of excessive need for very limited number of NCC helicopters in Europe conducting offshore operations in hostile sea areas.</p>
	NCC.IDE.H.226	<p>The requirements for crew survival suits set out in this section are in excess of ICAO Annex 6 and impose an unreasonable burden on non-commercial operators. The carriage and wearing of survival suits should be left to the discretion of the operator/pilot in command and considered by him within the additional life-saving equipment, including means of sustaining life, at NCC.IDE.H.227.</p>	<p>The introduction of requirements based on Part-CAT are unfounded and more reliance must be placed on the non-commercial operator to conduct his own risk assessments and equip his aircraft appropriately.</p> <p>A risk assessment requirement for</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		The text of NCC.IDE.H.226 should be adapted and moved to a new AMC2-NCC.IDE.H.227 and GM1-NCC.IDE.H.226 should be renumbered to GM1-NCC.IDE.H.227.	the pilot in command, aligning with the Part-NCC aeroplane requirements, has been proposed separately.
	NCC.IDE.H.227	<p>The requirements set out in this section are in excess of ICAO Annex 6 and impose an unreasonable burden on non-commercial operators. Additionally the layout of the paragraphs could be misleading. In a similar fashion to NCC.IDE.A.220, the requirement should be changed to that proposed below and an additional section on Risk Assessment, taken from AMC1-NCC.IDE.A.220, added to AMC1-NCC.IDE.H.227:</p> <p>NCC.IDE.H.227 Life-rafts, survival ELTs and survival equipment on extended overwater flights</p> <p>(a) <i>The pilot-in-command of a Helicopters helicopter operated in:</i></p> <p>(1) in performance class 1 or 2 on a flight over water at a distance from land corresponding to more than 10 minutes flying time at normal cruising speed; or</p> <p>(2) in performance class 3 on a flight over water at a distance corresponding to more than 3 minutes flying time at normal cruising speed,</p> <p><i>shall determine the risks to survival of the occupants of the helicopter in the event of a ditching, based on which he/she shall determine the carriage of the equipment listed</i></p>	<p>The introduction of requirements based on Part-CAT are unfounded and more reliance must be placed on the non-commercial operator to conduct his own risk assessments and equip his aircraft appropriately.</p> <p>The proposal realigns with Annex 6 Part III for GA and reflects similar logic applied to aeroplanes for pilot in command risk assessments.</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p><i>in (b).</i></p> <p>(b) The equipment referred to in (a) is:</p> <p>(1) Life-rafts in sufficient numbers to carry all persons on board, stowed so as to facilitate their ready use in emergency.</p> <p>(2) at least one survival ELT (ELT(S)) carried in a life-raft or life-jacket; and</p> <p>(3) life-saving equipment, including means of sustaining life, as appropriate to the flight to be undertaken.</p> <p>For information:</p> <p>The text of paragraph (b)(2) as presented in the CRD is fundamentally incorrect if it was to be used and does not reflect the intent of JAR-OPS 3.830 (a)(2) because the re-write from JAR-OPS has confused the significance of sufficient capacity with the stowage requirements:</p> <p>(2) in the case of a helicopter carrying more than 11 persons, at least two life-rafts, stowed-so as sufficiently together to facilitate their ready use in an emergency, <i>sufficient together</i> to accommodate all persons capable of being carried on board and, if <i>one is lost</i> the <i>remaining</i> life-raft(s) having the largest rated capacity is lost, to ensure that the overload capacity of the remaining life-raft shall be sufficient to accommodate all persons on the helicopter;</p>	
	NCC.IDE.H.231	This section is drawn from the requirements in Part-CAT but is disproportionate and unjustified for Part-	Whilst the intention is understood, the adoption of this rule imposing

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>NCC. The operator/pilot in command should be allowed to determine the risks of his operations and apply the appropriate requirements for operations in the offshore hostile environment. Elements of the text could be amalgamated with other sections. The text provides suitable information for an operator to consider and should be moved to the AMC/GM.</p> <p>Delete NCC.IDE.H.231 and incorporate in new AMC as follows:</p> <p>AMC3-NCC.IDE.227</p> <p>Helicopters <i>when</i> operated in offshore operations in a hostile sea area <i>in the circumstances detailed at NCC.IDE.H.227 (a)</i> [<i>as proposed separately by UK CAA</i>], at a distance from land corresponding to more than 10 minutes flying time at normal cruising speed, shall <i>should</i> comply <i>conform</i> with the following:</p> <p>(a) When the weather report or forecasts available to the commander <i>pilot in command</i> indicate that the sea temperature will be less than plus 10 °C during the flight, or when the estimated rescue time exceeds the calculated survival time, or the flight is planned to be conducted at night, all persons on board are wearing <i>should wear</i> a survival suit.</p> <p>(b) All life-rafts carried in accordance with NCC.IDE.H.227 shall <i>should</i> be installed so as to be usable in the <i>anticipated</i> sea conditions in which the helicopter's ditching, flotation and trim characteristics were evaluated in order to comply</p>	<p>CAT standards on operators of non-commercial helicopters would be disproportionate and impose unreasonable burden and cost. Additionally there is no introductory date and so this rule would be retrospective.</p> <p>The number of operators likely to conduct 'offshore operations' in a hostile environment in Part-NCC is expected to be very small indeed and therefore a whole set of 'heavy' requirements is unjustified.</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>with the ditching requirements for certification.</p> <p>(c) The helicopter shall should be equipped with an emergency lighting system with an independent power supply to provide a source of general cabin illumination to facilitate the evacuation of the helicopter.</p> <p>(d) All emergency exits, including crew emergency exits, and the means of opening them shall should be conspicuously marked for the guidance of occupants using the exits in daylight or in the dark. Such markings shall should be designed to remain visible if the helicopter is capsized and the cabin is submerged.</p> <p>(e) All non-jettisonable doors that are designated as ditching emergency exits shall should have a means of securing them in the open position so that they do not interfere with occupants' egress in all sea conditions up to the maximum anticipated. required to be evaluated for ditching and flotation.</p> <p>(f) All doors, windows or other openings in the passenger compartment assessed as suitable for the purpose of underwater escape shall should be equipped so as to be operable in an emergency.</p> <p>(g) Life-jackets shall should be worn at all times, unless the passenger or crew member is wearing an integrated survival suit that meets the combined requirement of the survival suit and</p>	

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		life-jacket	
	NCC.IDE.H.235	<p>This section is drawn from the requirements in Part-CAT but is disproportionate for Part-NCC and extends beyond the requirements of Annex 6 Part III. In addition, many States have not required such provisions for helicopter ditching and, as there is no introduction date, the rule would have to be applied retrospectively. Comments from the NPA have not been adequately addressed.</p> <p>Performance Classes are not appropriate for other than CAT operations.</p> <p>It is proposed that the requirements from Annex 6 be broadly applied and the section amended as indicated below. Additional AMC/GM might be appropriate to guide operators in deciding on the appropriate level of ditching provision. This proposal also aligns more with Part-NCO.</p> <p>NCC.IDE.H.235 All helicopters on flights over water – ditching</p> <p>(a) Helicopters shall be designed for landing on water, or certified for ditching in accordance with the relevant airworthiness code or fitted with emergency floatation equipment when operated in performance class 1 or 2 on a flight over water in a hostile environment at a distance from land corresponding to more than 10 minutes flying time at normal cruise speed.</p> <p>(b) Helicopters shall be designed for landing on water</p>	<p>Whilst the intention is understood, the adoption of this rule imposing CAT standards on operators of non-commercial helicopters would be disproportionate and impose unreasonable burden and cost. The principle of allowing operators/pilots in command to determine the hazards and apply risk reduction appropriately should be supported. Additionally there is no introductory date and so this rule would be retrospective. Similar comments made against the NPA have not been addressed proportionately.</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>or certified for ditching in accordance the relevant airworthiness code or fitted with emergency flotation equipment.</p> <p>(1) performance class 1 or 2 on a flight over water in a non-hostile environment at a distance from land corresponding to more than 10 minutes flying time at normal cruising speed;</p> <p>(2) performance class 2 when taking off or landing over water; or</p> <p>(3) performance class 3 on a flight over water beyond safe forced landing distance from land.</p>	
	AMC1-NCC.GEN.110	The AMC should be deleted. If it's considered that specific attention needs to be drawn to incident reporting, GM material would be more appropriate.	The IR does not specifically address incident reporting so this AMC adds a requirement rather than providing a means of complying with the rule about complying with the law etc. If the national legislation requires reports to be made, it must be done. If not, it need not be done.
	AMC1-NCC.GEN.150(e) DGOR Template, Notes 6 and 7.	"... identified in 5" should be "... identified in Note 4"?	The reference seems to be wrong. "... identified in 5" is unclear, since it could refer to Note 5 or Box 5 of the form.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	AMC3-NCC.OP.110	At sub-paragraph 3.b the text describes various requirements for RVR/visibility depending upon helicopter operations in either Performance Class 1 or 2. Whilst GA helicopters do not operate to performance classes as such, these are reserved for CAT, similar operating conditions may be inferred (eg engine accountability and safe forced landing capability). Both here and in other sections of OP dealing with IFR flight, consideration should be given to accommodating large single engine helicopters (PC3) which could operate in IFR without the restrictions placed on them by Part-CAT.	Extending the rules/AMC to all potential helicopter types likely to be covered by Part-NCO.
	AMC8-NCC.OP.110 Paragraph 1.	“when” should be moved from the introductory sentence to (a): “1 A conversion from meteorological visibility to RVR/CMV should not be used: a. when reported ... b. for calculating ... c. for other ...”	“When” only applies to (a); (b) and (c) use “for”.
	GM3-NCC.OP.110	Amend meaning of V_{toss} to: (velocity take-off safety speed).	Accuracy
	GM1-NCC.OP.220 Airborne collision avoidance system (ACAS)	ACAS FLIGHT CREW TRAINING paragraph 2 first sentence refers to ACAS III. The operational and technical requirements for an ACAS III (which provides horizontal in addition to ACAS II vertical resolution avoidance manoeuvres) have not been	Correction of text

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		established. In addition, there are no ICAO SARPs for ACAS III, nor plans for their development.	
	GM1-NCC.OP.220 Airborne collision avoidance system (ACAS)	ACAS FLIGHT CREW TRAINING paragraph 3 states that 'the information provided is valid for version 7 and 7.1 (ACAS II). Where differences arise, these are identified.' It should be noted that software version 7.1 is expected to become the standard within the EU from 1 March 2012 (retrofitting to be completed by 1 December 2015). Consideration should perhaps be given to reflecting this development by means of a note to this paragraph.	Improved text
	GM1-NCC.OP.220 Airborne collision avoidance system (ACAS)	ACAS FLIGHT CREW TRAINING paragraph 6c refers to EUROCONTROL ACAS II 'safety flash' Bulletins. This is very welcome, however consideration should be given to providing information as to where these bulletins can be accessed by means of a note to this paragraph. Note that the Bulletins are more correctly known as ACAS II Bulletins, and that Eurocontrol also publishes a series of ACAS II-related Safety Messages. Amend 'EUROCONTROL' to read 'EUROCONTROL'.	Improved text Correction of spelling mistake.
	AMC1-NCC.OP.230	Amend 1.i to read: FATO / runway edge lights; or	Accuracy
	AMC1-NCC.POL.105(c)	Amend last word of para 2 to read: aeroplane aircraft	Accuracy
	GM1-NCC.POL.105(d) TYPE OF FLIGHTS	Paragraph 2 gives one of the points as N2700 W00900.	Inconsistency between text and diagram.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	Paragraph 2.	The equivalent point marked on the diagram is 008W.	
	AMC1-NCC.IDE.A.195 Paragraph 2	Would be better as: The amount of oxygen should be determined on the basis of cabin pressure altitude and flight duration, and on the assumption that ..."	"on the basis of" refers to the first and second things in the list, but not the third. Having "and," leads the reader to expect that the following clause (on the assumption that ...) is a sub-clause when it is not.
	AMC2-NCC.IDE.A.220 Flight over water	LIFE–RAFTS AND EQUIPMENT FOR MAKING DISTRESS SIGNALS paragraph 1g refers to ICAO Annex 2, Rules of the Air. Should the Standardised European Rules of the Air (SERA) also – or instead - be referred to? SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.	Clarification.
	AMC1-NCC.IDE.A.230	Delete ADDITIONAL SURVIVAL EQUIPMENT paragraph 1.a. There is no benefit to justify the proposed requirement. Paragraph 3 states that items of equipment specified in paragraph 1 need not be duplicated if they are already carried in accordance with another requirement. However, 'water' would not usually be considered to be 'equipment' and, in any case, is usually carried for comfort reasons rather than to meet a requirement.	This paragraph details requirements for additional survival equipment to be carried when operating over areas in which search and rescue would be especially difficult. Paragraph 1a specifies a requirement to carry 500ml of water for every 4 or fraction of 4 persons on board. There is no precedent e.g. in ICAO SARPS for this requirement. The likelihood of this water ever being required, or being

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
			<p>accessible/intact in a situation when it might be required is extremely remote.</p> <p>The volume of liquid carried equates to 125ml per person, which would make no significant difference to their survival.</p> <p>There would be an ongoing financial and environmental cost to society of the additional fuel burn associated with carrying the weight of water.</p>
	GM2-NCC.IDE.A.230	It is proposed that where the term 'Competent Authority' is used in this section that it be replaced by 'State'.	Search and Rescue is a State responsibility and fulfilled in a manner adopted by that State.
	AMC1-NCC.IDE.H.165 Table 1, Row 26.	In the second line, write "sas" as "stability augmentation system". Or write "SAS" and define it.	Current text is unclear.
	AMC1-NCC.IDE.H.170 Table 1, Row 4.	"This includes any application used for delivery of flight information data to specific aeroplanes." Change "aeroplanes" to "helicopters".	This is the helicopter section.
	AMC3-NCC.IDE.H.215	This AMC should be moved to AMC2-NCC.IDE.H.227 and AMC2-NCC.IDE.H.230. Alternatively, explain which requirements are being referred to, e.g. "An ELT(AP) may be used to replace one ELT(S)	The text is confusing since it says that one required ELT(S) can be replaced by something else. However, NCC.IDE.H.215 does not specifically require an ELT(S).

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		required by NCC.IDE.H.227 or NCC.IDE.H.230 provided that it meets ..."	
	AMC1-NCC.IDE.H.227	<p>In support of a proposed change to NCC.IDE.H.227 to include the risk assessment process for over water flight, the following text to support this, taken from the equivalent aeroplane section, is suggested for addition to AMC1-NCC.IDE.H.227;</p> <p>AMC1-NCC.IDE.H.227 Life-rafts, survival ELTs and survival equipment on extended overwater flights</p> <p>RISK ASSESSMENT</p> <ol style="list-style-type: none"> 1. When conducting the risk assessment, the pilot-in-command should base his/her decision, as far as is practicable, on the Implementing Rules and AMCs applicable to the operation of the helicopter. 2. The pilot-in-command should, for determining the risk, take the following operating environment and conditions into account: <ol style="list-style-type: none"> a. sea state; b. sea and air temperatures; c. the distance from land suitable for making an emergency landing; and d. the availability of search and rescue facilities. <p>LIFE-RAFTS AND EQUIPMENT FOR MAKING DISTRESS SIGNALS</p>	To include sensible and standardised procedures, between aeroplane and helicopter, in the pilot in command responsibilities and risk assessment process.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		
	AMC1-NCC.IDE.H.227 (2)	<p>The specifications for the content of the life-raft equipment is comprehensive but over proscriptive and not aligned with the similar requirements for aeroplanes at AMC1-NCC.IDE.A.220.</p> <p>It is recommended that the text of paragraph (2) be replaced with that of paragraphs (2) & (3) from the aeroplane AMC.</p>	Proportionality and standardisation between NCC aeroplanes and helicopters.
	AMC1-NCC.IDE.H.230	<p>Delete ADDITIONAL SURVIVAL EQUIPMENT paragraph 1.a.</p> <p>There is no benefit to justify the proposed requirement.</p> <p>Paragraph 3 states that items of equipment specified in paragraph 1 need not be duplicated if they are already carried in accordance with another requirement. However, 'water' would not usually be considered to be 'equipment' and, in any case, is usually carried for comfort reasons rather than to meet a requirement.</p>	<p>This paragraph details requirements for additional survival equipment to be carried when operating over areas in which search and rescue would be especially difficult. Paragraph 1a specifies a requirement to carry 500ml of water for every 4 or fraction of 4 persons on board.</p> <p>There is no precedent e.g. in ICAO SARPS for this requirement.</p> <p>The likelihood of this water ever being required is remote.</p> <p>The volume of liquid carried equates to 125ml per person, which would make no significant difference to their survival.</p> <p>There would be an ongoing financial and environmental cost to society of the additional fuel burn associated with carrying the</p>

Reaction form | CRD OPS II

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
			weight of water.
	GM1-NCC.IDE.A.230 Survival equipment	SIGNALLING EQUIPMENT refers to ICAO Annex 2, Rules of the Air. Should the Standardised European Rules of the Air (SERA) also – or instead - be referred to? SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.	Clarification.
	GM2-NCC.IDE.H.230	It is proposed that where the term ‘Competent Authority’ is used in this section that it be replaced by ‘State’.	Search and Rescue is a State responsibility and fulfilled in a manner adopted by that State.
	AMC1-NCC.IDE.H.231	This information should be made GM and aligned with AMC1-NCC.IDE.H.227 as the UK has proposed deletion of NCC.IDE.231.	Proportionate use of information

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
Resulting Text to Part-NCO (CRD b.3)	Part-NCO	At various points within Part-NCO, the term 'MOPSC' has been used which is not appropriate as NCO operations are not required to be conducted in accordance with an Operations Manual where a MOPSC would be determined. Using the definition text from Article 3 of the BR it is proposed where appropriate throughout NCO MOPSC is amended as indicated below: with a certificated maximum passenger seating configuration of having an MOPSC	Clarification of requirement and correction of terminology.
	NCO.IDE.	The term 'pressure altitude' used in all aircraft types IDE sections is not correct. Amend the term to ' barometric altitude '. ICAO have been informed of this error in Annex 6.	Correct terminology.
	NCO.GEN.130	In order to provide a more realistic requirement, amend text to: The operator shall, at all times, have available for immediate communication to rescue coordination centres (RCCs) lists containing information on the emergency and survival equipment carried on board.	The emergency and survival equipment carried on board light aircraft frequently changes according to the flight being undertaken (e.g. light aircraft do not routinely carry life jackets and life rafts on flights over land). It is impractical for the operator, who is usually the pilot in NCO operations, to continually maintain a list of this equipment. Furthermore it is considered that the amount of equipment usually carried is small enough for the

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
			operator to be able to recall from memory. However, cognisant of the fact that aircraft operating NCO may be large and carry a lot of equipment, an AMC requiring a list to be compiled is proposed. See additional comment for AMC1-NCO.GEN.130
	NCO.GEN.135	Many light aircraft have limited capacity for storing documents on board, especially those documents normally held in a bound book such as the aircraft log or technical log books. Furthermore, many light aircraft are exposed to the weather during operation and when parked and this is likely to lead to documents becoming damaged or lost either whilst being stored in the aircraft or carried to and from the aircraft. Those documents that cannot be carried as copies (e.g. the CofA and CofR) are particularly at risk. The need to have documents available in the case of inspection is understood but it is thought that the requirement in (d) for the PIC to make the documents available to the Competent Authority is sufficient.	Realism measure to accept vulnerability of original copies of documents and limited suitable storage facilities in light aircraft.
	NCO.OP.125	The requirement for aeroplanes to carry 30 or 45 minutes of reserve fuel for VFR flight is excessive, particularly in relation to short A-A flights staying within the vicinity of the aerodrome (e.g. circuit training, glider towing). It is proposed that the text is amended to read: (a) The pilot-in-command shall only commence a	Reinstatement of the original OPS.GEN.205(c) exception is proposed but with a nominal reserve of 10 minutes in order to satisfy the ERs.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>flight if the aeroplane carries sufficient fuel and oil for the following:</p> <p>(1) for visual flight rules (VFR) flights:</p> <p>(i) by day, to fly to the aerodrome of intended landing and thereafter to fly for at least 30 minutes at normal cruising altitude; or</p> <p>(ii) by night, to fly to the aerodrome of intended landing and thereafter to fly for at least 45 minutes at normal cruising altitude; or</p> <p><i>(iii) by day taking-off and landing at the same aerodrome/landing site and remaining within 50nm of that aerodrome/landing site, to fly for at least 10 minutes at normal cruising altitude having returned to the aerodrome/landing site;</i></p>	
	NCO.OP.126 (a)(2)(i)	<p>For clarity amend text to read:</p> <p>(2) for IFR flights:</p> <p>(i) <i>when no alternate is required or no weather-permissible alternate aerodrome is available</i>, to fly to the aerodrome/operating site of intended landing, and thereafter to fly for 30 minutes at holding speed at 450 m (1 500 ft) above the destination aerodrome/operating site under standard temperature conditions and approach and land when no alternate is required or no weather-permissible alternate aerodrome is available; or</p>	Clarity of intent and alignment with text in following paragraph.
	NCO.OP.145 (a)	The rule reflects Annex 6 Part II 2.2.3.5 which does not specifically provide for an instrument approach procedure to be available (unlike by paragraph (b))	Clarity and safety of intended operation under IFR albeit the approach and landing must be in

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>and also for helicopters at NCO.OP.146(a)) by which a safe descent below MSA would be made to attain the approach and landing under VMC. It is therefore suggested that the text is amended to read:</p> <p>(a) <i>an instrument approach procedure is prescribed for the aerodrome of intended landing and</i> the available current meteorological information indicates that, for the period from 1 hour before until 1 hour after the estimated time of arrival, or from the actual time of departure to 1 hour after the estimated time of arrival, whichever is the shorter period, the approach and landing may be made under visual meteorological conditions (VMC);</p>	VMC.
	NCO.OP.146	<p>It is proposed that a similar option for helicopters be inserted to align with the aeroplane option at NCO.OP.145(a) as amended by CAA UK added proposal.</p> <p>(a) <i>an instrument approach procedure is prescribed for the aerodrome of intended landing and the available current meteorological information indicates that, for the period from 1 hour before until 1 hour after the estimated time of arrival, or from the actual time of departure to 1 hour after the estimated time of arrival, whichever is the shorter period, the approach and landing may be made under visual meteorological conditions (VMC);</i></p> <p>Renumber subsequent sub-paragraphs.</p>	Alignment and practical utilisation.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	NCO.OP.146 (b)	<p>There is no time period assigned to this rule as in other parts. It is proposed that the same principle as used in NCO.OP.145 (b) be applied for helicopters. Additionally, sub-para (4) is amended to apply PNR to all isolated destinations.</p> <p>Amend (b) to read:</p> <p>(b) the place of intended landing is isolated and:</p> <p>(1) an instrument approach procedure is prescribed for the aerodrome of intended landing;</p> <p>(2) available current meteorological information indicates that the following meteorological conditions will exist from 2 hours before to 2 hours after the estimated time of arrival:</p> <p>(2i) the cloud base is at least 120 m (400 ft) above the minimum associated with the instrument approach procedure;</p> <p>(3ii) visibility is at least 1 500 m more than the minimum associated with the procedure; and</p> <p>(43) a point of no return (PNR) is determined in case of an offshore destination.</p>	Alignment and safety of intent.
	NCO.OP.195	The pilot-in-command shall ensure that when flight crew members engaged in performing duties essential to the safe operation of an aircraft in flight use supplemental oxygen continuously whenever the cabin altitude exceeds 10 000 ft for a period of more	The current text is not clear about who should be using supplemental oxygen.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		than 30 minutes and whenever the cabin altitude exceeds 13 000 ft.	
	NCO.POL.110 (b)	This is a requirement under the Rules of the Air. It is proposed that paragraph (b) be deleted.	This requirement is in SERA Part A para 3.1.2.1. Guidance on the meaning of 'open air assembly' is being created by the SERA Working Group.
	NCO.IDE.A.100	As written, it is not clear which items are required to be approved. Amend to read: (a) Instruments and equipment required by this Part shall be approved in accordance with the applicable airworthiness requirements if they are: <i>(1) used by the flight crew to control the flight path; or</i> <i>(2) used to comply with NCO.IDE.A.190</i> <i>(3) used to comply with NCO.IDE.A.195; or</i> <i>(4) installed in the aeroplane.</i>	Clarification of intent
	NCO.IDE.A.105	Many aircraft are not operated in accordance with a Minimum Equipment List but they must be operated in accordance with the aircraft flight manual. The text may be clarified as indicated: A flight shall not be commenced when any of the aeroplane instruments, items of equipment or functions required for the intended flight are inoperative or missing, unless: (a) the aeroplane is operated in accordance with the	Clarification of intent. Text added is consistent with NCO.IDE.S.105(a)

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		minimum equipment list (MEL), if established; or (b) the aeroplane is subject to a permit to fly issued in accordance with the applicable airworthiness requirements; or <i>(c) the instrument, item of equipment or function is not required by the AFM</i>	
	NCO.IDE.A.115	Navigation and anti-collision lights are detailed in the Rules of the Air. Delete (a) and (b) Or Replace with: (a) <i>Lights as required by Part-SERA</i> (b) (renumber onwards)	This requirement is in SERA Part A para 3.2.4.
	NCO.IDE.A.120 (b)	The requirements for this section have been altered from those in Annex 6 Pt II where flight " <i>in conditions where the aeroplane cannot be maintained in a desired attitude without reference to one or more additional instruments</i> " is contained in the IFR paragraph. As a result, the requirement at sub-paragraph (3) for 'a means of preventing malfunction of the airspeed indicating system required in (a)(4) due to condensation or icing', has been transposed and causes unnecessary burden on VMC at night and may prevent many aircraft flying. It is suggested that: a) either the flight 'in conditions when the desired attitude cannot be maintained' is returned to the IFR	To prevent unnecessary and unintended prevention of legitimate flight, the equipment requirement should be adjusted to realign with Annex 6 Pt II.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		section and (3) is removed; b) the pitot heat requirement at (3) is dropped; or c) the pitot heat requirement at (3) is put to AMC.	
	NCO.IDE.A.130	The text uses the term ‘maximum operational passenger seating configuration (MOPSC)’ which is not appropriate for Part-NCO as operations are not required to be conducted in accordance with an Operations Manual where a MOPSC would be determined. Using the definition text from Article 3 of the BR it is proposed that the sentence is amended as indicated. Additionally, it might be suitable to make it clear that this only applies to single turbo-prop aeroplanes. Amend the text to read: Turbine-powered Single turboprop aeroplanes with a certificated maximum operational passenger seating configuration (MOPSC) of more than nine shall be equipped with a TAWS that meets the requirements for:	Clarification of requirement and correct use of terms.
	NCO.IDE.A.150(b)(1)(i)	Change to "... in the passenger compartment will be above 14 000 ft; and".	According to the current text, there are requirements to supply oxygen when the pressure altitude is: <ul style="list-style-type: none"> • between 10 000 and 14 000 ft [(b)(1)(ii)] • above (?) between 14 000 and 15 000 ft [(b)(1)(i)] • between 15 000 and 25 000 ft

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
			<p>if they can't descend in time [(b)(2)]</p> <ul style="list-style-type: none"> • above 25 000 ft [(b)(2)]. <p>If they can descend quickly enough, they don't need to supply oxygen between 15 000 and 25 000 ft. So, for example, the operator may have to supply oxygen at 12 000 ft but not at 18 000 ft.</p>
	NCO.IDE.A.150(b)(1)(ii)	<p>Change to:</p> <p>"10% of the passengers for any period in excess of 30 minutes when the pressure altitude in the passenger compartment will be between 10 000 ft and 14 000 ft;"</p>	To be consistent with NCO.IDE.A.155(b)(1).
	NCO.IDE.A.160	<p>Hand fire extinguishers may become a hazard if the aircraft is conducting aerobatics. It is proposed that an alleviation is added as indicated:</p> <p>(a) Aeroplanes, except touring motor gliders (TMG), shall be equipped with at least one hand fire extinguisher:</p> <p>(1) in the flight crew compartment; and</p> <p>(2) in each passenger compartment that is separate from the flight crew compartment, except if the compartment is readily accessible to the flight crew.</p> <p><i>(b) notwithstanding (a), an aeroplane shall not be required to be equipped with a hand fire extinguisher if the purpose of the flight is to</i></p>	Recognition of potential hazardous loose object in the cockpit during aerobatic manoeuvres.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p><i>engage in aerobatic flight.</i></p> <p>(b c) The type and quantity of extinguishing agent for the required fire extinguishers shall be suitable for the type of fire likely to occur in the compartment where the extinguisher is intended to be used and to minimise the hazard of toxic gas concentration in compartments occupied by persons.</p>	
	NCO.IDE.A.170	<p>Whilst noting the requirements of Annex 6 Pt II, it is considered that mandating the fitment or carriage of ELTs or PLBs at all times for NCO operations is over burdensome and disproportionate especially where such demands have not previously been made by all Member States. The rules as worded will impose a retrospective cost to those aeroplanes not currently required to be fitted with an ELT by local legislation.</p> <p>Rather than mandating fitment at all times, it is recommended that fitment or carriage of location devices be determined on a risk based principle dependent on the circumstances of the flight in accordance with NCO.IDE.A.175 and NCO.IDE.A.180 and firmly linked to these requirements. This would provide for proportionate compliance using acceptable means and be appropriate to the circumstances. It is questioned whether a fixed ELT(A) is necessarily an effective device in a ditching scenario due to activation and transmission issues once on or under the surface. Portable beacons are far more likely to be successful if carried on the person or easily accessible to the occupants. It is also questionable whether a location device is necessary for all flights including for instance A to A</p>	<p>It is considered that for NCO operations it is more appropriate for the pilot in command together with the occupants of the aircraft to assess the risk and decide for themselves whether ELT/PLB carriage is necessary on a particular flight. For many local flights carriage requirements may be excessive.</p> <p>Furthermore, the majority of aircraft used in NCO operations are not already equipped with such equipment. The requirement to carry an ELT/PLB at all times would place a considerable burden on existing aircraft operators who would need to purchase and possibly install new equipment.</p> <p>If accepted the compliance date would need to be agreed.</p>

	Name: UK CAA		
Document	Reference	Proposal / comment	Justification
		<p>operations and circuit work.</p> <p>AMC1-NCO.IDE.A.180 also states that an ELT(S) or PLB should be carried on aeroplanes operated over areas where search and rescue would be especially difficult. This fitment needs to be considered in balance with the general ELT/PLB requirements.</p> <p>There is merit in aligning the aeroplane and helicopter requirements for proportionality and reality and also to recognise the important principle of choice for NCO operations.</p> <p>New text for NCO.IDE.A.170, 175 & 180 is proposed. The result would be that ELT/PLB carriage is not required at all times, however, when flying over water or areas where search and rescue would be especially difficult, the PIC must assess the risks to survival and determine carriage of an ELT/PLB accordingly. This is consistent with the existing approach for carriage of other survival equipment. A revised compliance date has also been added to reflect current fitment.</p> <p>Proposed text:</p> <p>(a) When required by NCO.IDE.A. 175 or NCO.IDE.A. 180, aeroplanes shall be equipped with:</p> <p>(1) an ELT of any type, when first issued with an individual CofA on or before 1 July 200814;</p> <p>(2) an automatic ELT, when first issued with an individual CofA after 1 July</p>	

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>200814; or</p> <p>(3) a personal locator beacon (PLB), carried by the pilot-in-command or a passenger, when having a MOPSE certificated maximum passenger seating configuration of six or less.</p> <p>See further comments on NCO.IDE.A.175 and NCO.IDE.A.180.</p>	
	NCO.IDE.A.175	<p>In line with the UK CAA comment at NCO.IDE.A.170 (ELTs), it is considered that fitment and carriage of location devices for NCO operations should be aligned with the circumstances of the flight and linked to the considerations under NCO.IDE.A.175 and NCO.IDE.A.180.</p> <p>The text of NCO.IDE.A.175(c) 'PIC...shall determine the risks to survival of the occupants...based on which he/she shall determine the carriage of...' is thought to be the most appropriate method for determining carriage of survival equipment in NCO operations, rather than mandating carriage on all aircraft at all times.</p> <p>With that principle in mind the following amendment is proposed for this section:</p> <p>(c) The pilot-in-command of an aeroplane operated at a distance away from land where an emergency landing is possible greater than that corresponding to 30 minutes at normal cruising speed or 50 NM, whichever is the lesser, shall determine the risks to survival of</p>	<p>It is considered that for NCO operations it is more appropriate for the pilot in command together with the occupants of the aircraft to assess the risk and decide for themselves whether ELT/PLB carriage is necessary on a particular flight. Additionally, proportionate alignment with the similar helicopter requirements will be achieved</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>the occupants of the aeroplane in the event of a ditching, based on which he/she shall determine the carriage of:</p> <ul style="list-style-type: none"> (1) equipment for making the distress signals; (2) life-rafts in sufficient numbers to carry all persons on board, stowed so as to facilitate their ready use in emergency; and (3) life-saving equipment, to provide the means of sustaining life, as appropriate to the flight to be undertaken. <p>(4) an ELT or PLB in accordance with NCO.IDE.A.170.</p> <p>See further comments on NCO.IDE.A.170, NCO.IDE.A.180, and AMC1-NCO.IDE.A.175.</p>	
	NCO.IDE.A.180	<p>In line with the UK CAA comment at NCO.IDE.A.170 (ELTs) and NCO.IDE.A.175, it is considered that fitment and carriage of location devices for NCO operations should be aligned with the circumstances of the flight and linked to the considerations under NCO.IDE.A.175 and NCO.IDE.A.180.</p> <p>Therefore new text for NCO.IDE.A.175 & 180 is proposed. The result is that ELT/PLB carriage is not required at all times, however, when flying over water or areas where search and rescue would be especially difficult, the PIC must assess the risks to survival and determine carriage of an ELT/PLB accordingly. This is consistent with the existing</p>	<p>It is considered that for NCO operations it is more appropriate for the pilot in command together with the occupants of the aircraft to assess the risk and decide for themselves whether ELT/PLB carriage is necessary on a particular flight.</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>approach for carriage of other survival equipment.</p> <p>Proposed text:</p> <p>(a) Aeroplanes operated over areas in which search and rescue would be especially difficult shall be equipped with such signalling devices and life-saving equipment, including means of sustaining life, as may be appropriate to the area overflown.</p> <p>(b) <i>The pilot-in-command of an aeroplane operated over areas in which search and rescue would be especially difficult shall determine the risks to survival of the occupants of the aeroplane in the event of a forced landing, based on which he/she shall determine the carriage of an Emergency Locator Transmitter or Personal Locator Beacon in accordance with NCO.IDE.A.170.</i></p> <p>See further comments on NCO.IDE.A.170 and NCO.IDE.A.175.</p>	
	NCO.IDE.A.190 (a)	<p>As written the text could give the impression that the fitment of radio communication equipment is always necessary and not only when required by the classification of the airspace.</p> <p>Amend to read:</p> <p>(a) <i>When required by the airspace being flown</i>, aeroplanes shall be equipped with radio communication equipment capable of conducting two-way communication with those aeronautical</p>	Clarification of requirement.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		stations and on those frequencies to meet airspace requirements.	
	NCO.IDE.H.100	<p>As written, it is not clear which items are required to be approved.</p> <p>Amend to read:</p> <p>(a) Instruments and equipment required by this Part shall be approved in accordance with the applicable airworthiness requirements if they are:</p> <p><i>(1) used by the flight crew to control the flight path;</i></p> <p><i>(2) used to comply with NCO.IDE.H.190</i></p> <p><i>(3) used to comply with NCO.IDE.H.195; or</i></p> <p><i>(4) installed in the helicopter.</i></p>	Clarification of intent
	NCO.IDE.H.105	<p>Many aircraft are not operated in accordance with a Minimum Equipment List but they must be operated in accordance with the aircraft flight manual. The text may be clarified as indicated:</p> <p>A flight shall not be commenced when any of the helicopter's instruments, items of equipment or functions required for the intended flight are inoperative or missing, unless:</p> <p>(a) the helicopter is operated in accordance with the minimum equipment list (MEL), if established; or</p> <p>(b) the helicopter is subject to a permit to fly issued in accordance with the applicable airworthiness requirements; or <i>or</i></p>	<p>Clarification of intent.</p> <p>Text added is consistent with NCO.IDE.S.105(a)</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<i>(c) the instrument, item of equipment or function is not required by the AFM.</i>	
	NCO.IDE.H.115	Navigation and anti-collision lights are detailed in the Rules of the Air. Delete (a) and (b) Or Replace with: (a) <i>Lights as required by Part-SERA</i> (b) (renumber onwards)	This requirement is in SERA Part A para 3.2.4.
	NCO.IDE.H.120 (b)	The requirements for this section have been altered from those in Annex 6 Pt III where flight " <i>in conditions where the helicopter cannot be maintained in a desired attitude without reference to one or more additional instruments</i> " is contained in the IFR paragraph. As a result, the requirement at sub-paragraph (3) for 'a means of preventing malfunction of the airspeed indicating system required in (a)(4) due to condensation or icing', has been transposed and causes unnecessary burden on VMC at night or when visibility is less than 1500 m and may prevent many aircraft flying. It is suggested that: a) either the flight 'in conditions when the desired attitude cannot be maintained' is returned to the IFR section and (3) is removed; b) the pitot heat requirement at (3) is dropped; or	To prevent unnecessary and unintended prevention of legitimate flight, the equipment requirement should be adjusted to realign with Annex 6 Pt III.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		c) the pitot heat requirement at (3) is put to AMC.	
	NCO.IDE.H.140 (a)	<p>Sub-paragraph (3):</p> <p>This states a compliance date of “after 31 July 1999” for seat belts. This is taken from JAR-OPS 3.730 (a)(3) and may not be appropriate for NCO as some helicopters may not be compliant. As it stands, this rule could require retrospective fitment that has not been justified. The compliance date should be re-visited to ensure that undue burden is not imposed unintentionally.</p>	Ensuring that undue burden and cost is not imposed unintentionally with unjustified compliance requirements.
	NCO.IDE.H.160	<p>Hand fire extinguishers may become a hazard if the aircraft is conducting aerobatics. It is proposed that an alleviation is added as indicated:</p> <p>(a) Helicopters shall be equipped with at least one hand fire extinguisher:</p> <p>(1) in the flight crew compartment; and</p> <p>(2) in each passenger compartment that is separate from the flight crew compartment, except if the compartment is readily accessible to the flight crew.</p> <p><i>(b) notwithstanding (a), a helicopter shall not be required to be equipped with a hand fire extinguisher if the purpose of the flight is to engage in aerobatic flight.</i></p> <p><i>(b c)</i> The type and quantity of extinguishing agent for the required fire extinguishers shall be suitable for the type of fire likely to occur in the compartment where the extinguisher is intended to be used and to minimise the hazard of toxic gas concentration in</p>	Recognition of potential hazardous loose object in the cockpit during aerobatic manoeuvres.

	Name: UK CAA		
Document	Reference	Proposal / comment	Justification
		compartments occupied by persons.	
	NCO.IDE.H.170	<p>Whilst noting the requirements of Annex 6 Pt III, it is considered that mandating the fitment or carriage of ELTs or PLBs at all times for NCO operations is over burdensome and disproportionate especially where such demands have not previously been made by all Member States. The rules as worded will impose a retrospective cost to those helicopters not currently required to be fitted with an ELT by local legislation.</p> <p>Rather than mandating fitment at all times, it is recommended that fitment or carriage of location devices be determined on a risk based principle dependent on the circumstances of the flight in accordance with NCO.IDE.H.175 and NCO.IDE.H.180 and firmly linked to these requirements. This would provide for proportionate compliance using acceptable means and be appropriate to the circumstances. It is questioned whether a fixed ELT(A) is necessarily an effective device in a ditching scenario due to activation and transmission issues once on or under the surface. Portable beacons are far more likely to be successful if carried on the person or easily accessible to the occupants. It is also questionable whether a location device is necessary for all flights including for instance A to A operations and circuit work.</p> <p>AMC1-NCO.IDE.H.180 also states that an ELT(S) or PLB should be carried on helicopters operated over areas where search and rescue would be especially difficult. This fitment needs to be considered in</p>	Clarification of requirement and correction of terminology. If accepted the compliance date would need to be agreed.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>balance with the general ELT/PLB requirements.</p> <p>There is merit in aligning the aeroplane and helicopter requirements for proportionality and reality and also to recognise the important principle of choice for NCO operations. As a result it is proposed to place the additional ELT(S) requirement for helicopters for consideration within AMC for NCO.IDE.H.175.</p> <p>New text for NCO.IDE.H.170, 175 & 180 is proposed. The result would be that ELT/PLB carriage is not required at all times, however, when flying over water or areas where search and rescue would be especially difficult, the PIC must assess the risks to survival and determine carriage of an ELT/PLB accordingly. This is consistent with the existing approach for carriage of other survival equipment. A revised compliance date has also been added to reflect current fitment.</p> <p>Proposed text:</p> <p><i>When required by NCO.IDE.H.175 or NCO.IDE.H.180</i></p> <p>(a) Helicopters <i>with a certificated maximum passenger seating</i> configuration of having an MOPSC above <i>more than six and with an individual CofA first issued on or before 1 July 2014</i> shall be equipped with (1) an automatic ELT of any type; and</p> <p>(2) one survival ELT (ELT(S)) or PLB in a life-raft or life-jacket when the helicopter is operated at a</p>	

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>distance from the shore corresponding to more than 3 minutes flying time at normal cruising speed.</p> <p>(b) Helicopters with a certificated maximum passenger seating configuration of more than six and with an individual CofA first issued after 1 July 2014 shall be equipped with (1) an automatic ELT; and</p> <p>(2) one survival ELT (ELT(S)) or PLB in a life-raft or life-jacket when the helicopter is operated at a distance from the shore corresponding to more than 3 minutes flying time at normal cruising speed.</p> <p>(bc) Helicopters having a certificated maximum passenger seating configuration MOPSC of six or less shall be equipped with a personal locator beacon (PLB), carried by the pilot-in-command or a passenger.</p> <p>(cd) ELTs of any</p>	
	NCO.IDE.H.175	<p>In line with the UK CAA comment at NCO.IDE.H.170 (ELTs), it is considered that fitment and carriage of location devices for NCO operations should be aligned with the circumstances of the flight and linked to the considerations under NCO.IDE.H.175 and NCO.IDE.H.180.</p> <p>The text of NCO.IDE.H.175(c) 'PIC...shall determine the risks to survival of the occupants...based on which he/she shall determine the carriage of...' is thought to be the most appropriate method for determining carriage of survival equipment in NCO operations, rather than mandating carriage on all</p>	<p>It is considered that for NCO operations it is more appropriate for the pilot in command together with the occupants of the aircraft to assess the risk and decide for themselves whether ELT/PLB carriage is necessary on a particular flight. Additionally, proportionate alignment with the similar aeroplane requirements will be achieved.</p>

	Name: UK CAA		
Document	Reference	Proposal / comment	Justification
		<p>aircraft at all times.</p> <p>Additionally, there are several omissions from this section when compared with the aeroplane equivalent and also reflecting back to Annex 6 Pt III. Changes effecting this points have been addressed.</p> <p>With that principle in mind the following amendments are proposed:</p> <p>(a) <i>The following</i> helicopters shall be equipped with a life-jacket for each person on board, or equivalent individual flotation device for each person on board younger than 24 months, stowed in a position that is readily accessible from the seat or berth of the person for whose use it is provided, when:</p> <ul style="list-style-type: none"> (1) <i>single-engine helicopters when</i> flying over water beyond autorotational distance from the shore; or (2) helicopters when taking off or landing at an aerodrome/operating site where the take-off or approach path is over water. (3) <i>amphibious helicopters operated over water;</i> (4) <i>helicopters operated at a distance away from land where an emergency landing is possible greater than that corresponding to 30 minutes at normal cruising speed or 50 NM, whichever is less.</i> 	

Document	Reference	Proposal / comment	Justification
	Name: UK CAA	<p>(b) Each life-jacket or equivalent individual flotation device shall be equipped with a means of electric illumination for the purpose of facilitating the location of persons.</p> <p>(c) The pilot-in-command of a helicopter operated on a flight over water at a distance from land corresponding to more than 30 minutes flying time at normal cruising speed or 50 NM, whichever is less, shall determine the risks to survival of the occupants of the helicopter in the event of a ditching, based on which he/she shall determine the carriage of:</p> <ul style="list-style-type: none"> (1) equipment for making the distress signals; (2) life-rafts in sufficient numbers to carry all persons on board, stowed so as to facilitate their ready use in emergency; and (3) life-saving equipment, to provide the means of sustaining life, as appropriate to the flight to be undertaken. <p>(4) an ELT or PLB in accordance with NCO.IDE.H.170.</p> <p>(d) The pilot-in-command of a helicopter shall determine the risks to survival of the occupants of the helicopter in the event of a ditching, when deciding if the life-jackets required in (a) shall be worn by all occupants.</p> <p>See further comments on NCO.IDE.H.170, NCO.IDE.H.180, AMC1-NCO.IDE.H.175.</p>	

Document	Reference	Proposal / comment	Justification
	NCO.IDE.H.180	<p>In line with the UK CAA comment at NCO.IDE.H.170 (ELTs) and NCO.IDE.H.175, it is considered that fitment and carriage of location devices for NCO operations should be aligned with the circumstances of the flight and linked to the considerations under NCO.IDE.H.175 and NCO.IDE.H.180.</p> <p>Therefore new text for NCO.IDE.H.175 & 180 is proposed. The result is that ELT/PLB carriage is not required at all times, however, when flying over water or areas where search and rescue would be especially difficult, the PIC must assess the risks to survival and determine carriage of an ELT/PLB accordingly. This is consistent with the existing approach for carriage of other survival equipment.</p> <p>Proposed text:</p> <p>(a) Aeroplanes operated over areas in which search and rescue would be especially difficult shall be equipped with such signalling devices and life-saving equipment, including means of sustaining life, as may be appropriate to the area overflown.</p> <p>(b) <i>The pilot-in-command of a helicopter operated over areas in which search and rescue would be especially difficult shall determine the risks to survival of the occupants of the helicopter in the event of a forced landing, based on which he/she shall determine the carriage of an Emergency Locator Transmitter or Personal Locator Beacon in accordance</i></p>	<p>It is considered that for NCO operations it is more appropriate for the pilot in command together with the occupants of the aircraft to assess the risk and decide for themselves whether ELT/PLB carriage is necessary on a particular flight.</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>with NCO.IDE.H.170.</p> <p>See further comments on NCO.IDE.H.170 and NCO.IDE.H.175.</p>	
	NCO.IDE.H.190 (a)	<p>As written the text could give the impression that the fitment of radio communication equipment is always necessary and not only when required by the classification of the airspace.</p> <p>Amend to read:</p> <p>(a) When required by the airspace being flown, helicopters shall be equipped with radio communication equipment capable of conducting two-way communication with those aeronautical stations and on those frequencies to meet airspace requirements.</p>	Clarification of requirement.
	NCO.IDE.S.100	<p>As written, it is not clear which items are required to be approved.</p> <p>Amend to read:</p> <p>(a) Instruments and equipment required by this Part shall be approved in accordance with the applicable airworthiness requirements if they are:</p> <p>(1) used by the flight crew to control the flight path; or</p> <p>(2) used to comply with NCO.IDE.S.145</p> <p>(3) used to comply with NCO.IDE.S.150; or</p> <p>(4) installed in the sailplane.</p>	Clarification of intent
	NCO.IDE.S.145 (a)	As written the text could give the impression that the	Clarification of requirement.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>fitment of radio communication equipment is always necessary and not only when required by the classification of the airspace.</p> <p>Amend to read:</p> <p>(a) When required by the airspace being flown, sailplanes shall be equipped with radio communication equipment capable of conducting two-way communication with those aeronautical stations or those frequencies to meet airspace requirements.</p>	
	NCO.IDE.B.100	<p>As written, it is not clear which items are required to be approved.</p> <p>Amend to read:</p> <p>(a) Instruments and equipment required by this Part shall be approved in accordance with the applicable airworthiness requirements if they are:</p> <p>(1) used by the flight crew to control the flight path; or</p> <p>(2) used to comply with NCO.IDE.B.145</p> <p>(3) installed in the balloon.</p>	Clarification of intent
	NCO.IDE.B.105	<p>Amend to read:</p> <p>A flight shall not be commenced when any of the balloon instruments, items of equipment or functions required for the intended flight are inoperative or missing, unless:</p> <p>(a) the balloon is operated in accordance with the</p>	<p>Many aircraft are not operated in accordance with a Minimum Equipment List but the AFM lists equipment required for flight.</p> <p>Text added is consistent with NCO.IDE.S.105(a).</p>

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		minimum equipment list (MEL), if established; or (b) the balloon is subject to a permit to fly issued in accordance with the applicable airworthiness requirements; or (c) <i>the instrument, item of equipment or function is not required by the AFM</i>	
	NCO.IDE.B.110	Amend to read: (a) <i>except for balloons in tethered flight</i> , position lights;	Balloons engaged in tethered flight should not be required to display position lights as it is impractical for them to do so and there is no safety benefit.
	NCO.IDE.B.110 (d)	Amend to read: (d) <i>hot air airships</i>	'Hot airship' is the incorrect term.
	NCO.IDE.B.145 (a)	As written the text could give the impression that the fitment of radio communication equipment is always necessary and not only when required by the classification of the airspace. Amend to read: (a) <i>When required by the airspace being flown</i> , balloons shall be equipped with radio communication equipment capable of conducting two-way communication with those aeronautical stations or those frequencies to meet airspace requirements.	Clarification of requirement.
	AMC1-NCO.GEN.130	CONTENT OF INFORMATION The information should include, as applicable, the number, colour and type of life rafts and	See comment on NCO.GEN.130

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>pyrotechnics, details of emergency medical supplies, water supplies and the type and frequencies of the emergency portable radio equipment.</p> <p>LIST TO BE COMPILED</p> <p>The operator of an aircraft that carries a large amount of emergency and survival equipment should maintain a list of such equipment in order to eliminate the potential for the operator to omit any items when communicating with RCCs.</p>	
	GM3-NCO.OP.110	<p>This GM refers to Part-NCC for methods of establishing RVR/CMV/Visibility minima. It is strongly recommended that the whole of Subpart B for Part-NCO be reviewed and elevated to reflect the same elements of Part-NCC so that all relevant information for NCO operators is in one document and of sufficient detail to allow operators full information.</p> <p>Operation of a Part NCO aircraft under IFR is little different from a Part-NCC one.</p>	Standardisation of level of information and requirements for IFR flight between Part-NCC and Part-NCO. NCO operators should have all the required information in Part-NCO.
	GM4-NCO.OP.110 Paragraph 1.	<p>"when" should be moved from the introductory sentence to (a):</p> <p>"1 A conversion from meteorological visibility to RVR/CMV should not be used:</p> <ol style="list-style-type: none"> a. when reported ... b. for calculating ... c. for other ..." 	"When" only applies to (a); (b) and (c) use "for".

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	GM5-NCO.OP.110 Paragraph 1.	It is thought that not all aeroplanes might have reference to 1g stalling speed so add text as shown: 1. Aircraft categories should be based on the indicated airspeed at threshold (VAT), which is equal to the stalling speed (VSO) multiplied by 1.3 or, where published , 1-g (gravity) stall speed (VS1g) multiplied by 1.23 in the landing configuration at the maximum certified landing mass. If both VSO and VS1g are available, the higher resulting VAT should be used.	Prevention of possible miscalculation.
	GM1-NCO.OP.112 Paragraph 3 (d)	Should say: "...enable the aeroplane: i. to attain ... ii. to remain ..."	Clarity of intent
	GM1-NCO.OP.112 Paragraph 5(e).	"to" should be moved from the introductory clause to i-iv: "... while climbing either: i. to the altitude ... ii. to the altitude ... iii. to the MSA; iv. to the minimum ... v. as directed ..."	v. does not follow on from the introductory clause.
	AMC3-NCO.IDE.A.170	Additional text is proposed: 2. A PLB should be registered with the National agency responsible for initiating search and rescue or	It is very important that the PLB is registered and the details provided in the registration match the aircraft the device is used in. The

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		other nominated agency. The registration information provided should include the type and registration mark of the aircraft the PLB is registered to. A separate PLB should be registered to each aircraft, vessel, vehicle, person etc. the device is intended to be used with and operators should refrain from using the PLB away from the aircraft it is registered to as in the event of an activation it is likely to cause confusion with the search and rescue agencies.	information follows that provided for ELTs at AMC2-NCO.IDE.A.170 (3).
	GM2-NCO.IDE.A.170 (new)	New and additional GM on ELT fitment, drawn from Annex 6 Pt II, is suggested for the guidance of PICs. ELT FITMENT The judicious choice of numbers of ELTs, their type and placement on aircraft, and associated floatable life support systems, will ensure the greatest chance of ELT activation in the event of an accident for aircraft operating over water or land, including areas especially difficult for search and rescue.	Useful information of assistance to PICs determining survival equipment carriage.
	AMC1-NCO.IDE.A.175	In furtherance to the UK CAA proposals for NCO.IDE.A.170 and 175, it is suggested that an additional consideration for ELT(S) carriage, similar to that derived from helicopters with a certificated maximum passenger seating configuration of over 6 when flying over water, should be added to AMC for consideration by the pilot in command. Therefore the following new sub-section is proposed: ELT(S) / PLB When operating at a distance from the shore corresponding to more than 10 minutes flying time at	A more reasonable and proportionate requirement that is part of the pilot in command's assessment of necessary survival equipment carriage and alignment with similar helicopter proposals.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		normal cruising speed aeroplanes should be equipped with at least one ELT(S) or PLB carried by either the pilot in command or a passenger.	
	AMC2-NCO.IDE.A.180	<p>Delete ADDITIONAL SURVIVAL EQUIPMENT paragraph 1.a.</p> <p>There is no benefit to justify the proposed requirement.</p> <p>Paragraph 2 states that items of equipment specified in paragraph 1 need not be duplicated if they are already carried in accordance with another requirement. However, 'water' would not usually be considered to be 'equipment' and, in any case, is usually carried for comfort reasons rather than to meet a requirement.</p>	<p>This paragraph details requirements for additional survival equipment to be carried when operating over areas in which search and rescue would be especially difficult. Paragraph 1a specifies a requirement to carry 500ml of water for every 4 or fraction of 4 persons on board.</p> <p>There is no precedent e.g. in ICAO SARPS for this requirement.</p> <p>The likelihood of this water ever being required, or being accessible /intact in a situation when it might be required, is extremely remote.</p> <p>The volume of liquid equates to 125ml per person, which would make no difference to their chances of survival</p> <p>There would be an ongoing financial and environmental cost to society of the fuel burn associated with carrying the additional weight of water.</p>
	GM1-NCO.IDE.A.180	SIGNALLING EQUIPMENT refers to ICAO Annex 2, Rules of the Air. Should the Standardised European	Clarification

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
	Survival equipment	Rules of the Air (SERA) also – or instead - be referred to? SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.	
	GM2-NCO.IDE.A.180	It is proposed that where the term ‘Competent Authority’ is used in this section that it be replaced by ‘State’.	Search and Rescue is a State responsibility and fulfilled in a manner adopted by that State.
	AMC1-NCO.IDE.A.195	This AMC is not required as it does not add to the rule; in fact it is the opposite situation.	Clarity of intent.
	GM1-NCO.IDE.A.195	This GM does not add any value and should be removed.	Clarity of intent.
	AMC1-NCO.IDE.H.120(a)(5)	Amend the title to read: AMC1-NCO.IDE.H.120(a)(5) Operations under VFR & operations under IFR – flight and navigational instruments and associated equipment Amend text to read: The means of measuring and displaying slip may be a slip string for operations under VFR <i>by day</i> .	Clarity of intent and visibility of external ‘slip string’ at night is questionable.
	GM2-NCO.IDE.H.170 (new)	Additional GM on ELT fitment, drawn from Annex 6 Pt II, is suggested for the guidance of PICs. ELT FITMENT The judicious choice of numbers of ELTs, their type and placement on aircraft, and associated floatable life support systems, will ensure the greatest chance of ELT activation in the event of an accident for aircraft operating over water or land, including areas	Useful information of assistance to PICs determining survival equipment carriage.

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		especially difficult for search and rescue.	
	AMC3-NCO.IDE.H.170	<p>Additional text is proposed:</p> <p>2. A PLB should be registered with the National agency responsible for initiating search and rescue or other nominated agency. The registration information provided should include the type and registration mark of the aircraft the PLB is registered to. A separate PLB should be registered to each aircraft, vessel, vehicle, person etc. the device is intended to be used with and operators should refrain from using the PLB away from the aircraft it is registered to as in the event of an activation it is likely to cause confusion with the search and rescue agencies.</p>	It is very important that the PLB is registered and the details provided in the registration match the aircraft the device is used in. The information follows that provided for ELTs at AMC2-NCO.IDE.H.170 (3).
	AMC1-NCO.IDE.H.175	<p>In furtherance to the UK CAA proposals for NCO.IDE.H.170 and 175, it is suggested that the additional ELT(S) carriage requirement for helicopters with a certificated maximum passenger seating configuration of over 6 when flying over water should be moved to AMC for assessment by the pilot in command.</p> <p>Therefore the following new sub-section is proposed:</p> <p>ELT(S) / PLB</p> <p>When operating at a distance from the shore corresponding to more than 10 minutes flying time at normal cruising speed helicopters should be equipped with at least one ELT(S) or PLB carried by either the pilot in command or a passenger.</p>	A more reasonable and proportionate requirement that is part of the pilot in command's assessment of necessary survival equipment carriage.
	AMC2-NCO.IDE.H.180	Delete ADDITIONAL SURVIVAL EQUIPMENT	This paragraph details requirements for additional

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		<p>paragraph 1.a.</p> <p>There is no benefit to justify the additional financial burden of the proposed requirement.</p> <p>Paragraph 2 states that items of equipment specified in paragraph 1 need not be duplicated if they are already carried in accordance with another requirement. However, 'water' would not usually be considered to be 'equipment' and, in any case, is usually carried for comfort reasons rather than to meet a requirement.</p>	<p>survival equipment to be carried when operating over areas in which search and rescue would be especially difficult. Paragraph 1a specifies a requirement to carry 500ml of water for every 4 or fraction of 4 persons on board.</p> <p>There is no precedent e.g. in ICAO SARPS for this requirement.</p> <p>The likelihood of this water ever being required is remote.</p> <p>The volume of liquid equates to 125ml per person, which would make no difference to their chances of survival</p> <p>There would be an ongoing financial and environmental cost to society of the fuel burn associated with carrying the additional weight of water.</p>
	GM1-NCO.IDE.H.180 Survival equipment	<p>SIGNALLING EQUIPMENT refers to ICAO Annex 2, Rules of the Air. Should the Standardised European Rules of the Air (SERA) also – or instead - be referred to?</p> <p>SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.</p>	Clarification
	GM2-NCO.IDE.H.180	It is proposed that where the term 'Competent Authority' is used in this section that it be replaced	Search and Rescue is a State responsibility and fulfilled in a

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		by 'State'.	manner adopted by that State.
	AMC1-NCO.IDE.H.195	This AMC is not required as it does not add to the rule; in fact it is the opposite situation.	Clarity of intent.
	GM1-NCO.IDE.H.195	This GM does not add any value and should be removed.	Clarity of intent.
	AMC2-NCO.IDE.S.140	<p>Delete ADDITIONAL SURVIVAL EQUIPMENT paragraph 1.a.</p> <p>There is no benefit to justify the proposed requirement.</p> <p>Paragraph 2 states that items of equipment specified in paragraph 1 need not be duplicated if they are already carried in accordance with another requirement. However, 'water' would not usually be considered to be 'equipment' and, in any case, is usually carried for comfort reasons rather than to meet a requirement.</p>	<p>This paragraph details requirements for additional survival equipment to be carried when operating over areas in which search and rescue would be especially difficult. Paragraph 1a specifies a requirement to carry 500ml of water on board.</p> <p>There is no precedent e.g. in ICAO SARPS for this requirement.</p> <p>The likelihood of this water ever being required is remote.</p> <p>The volume of liquid would make little difference to the chances of survival.</p>
	GM1-NCO.IDE.S.140 Survival equipment	<p>SIGNALLING EQUIPMENT refers to ICAO Annex 2, Rules of the Air. Should the Standardised European Rules of the Air (SERA) also – or instead - be referred to?</p> <p>SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.</p>	Clarification
	GM2-NCO.IDE.S.140	It is proposed that where the term 'Competent Authority' is used in this section that it be replaced	Search and Rescue is a State responsibility and fulfilled in a

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
		by 'State'.	manner adopted by that State.
	GM1-NCO.IDE.B.130(c) Flight over water	SIGNALLING EQUIPMENT refers to ICAO Annex 2, Rules of the Air. Should the Standardised European Rules of the Air (SERA) also – or instead - be referred to? SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.	Clarification
	AMC2-NCO.IDE.B.135	Delete ADDITIONAL SURVIVAL EQUIPMENT paragraph 1.a. There is no benefit to justify the proposed requirement. Paragraph 2 states that items of equipment specified in paragraph 1 need not be duplicated if they are already carried in accordance with another requirement. However, 'water' would not usually be considered to be 'equipment' and, in any case, is usually carried for comfort reasons rather than to meet a requirement.	This paragraph details requirements for additional survival equipment to be carried when operating over areas in which search and rescue would be especially difficult. Paragraph 1a specifies a requirement to carry 500ml of water for every 4 or fraction of 4 persons on board. There is no precedent e.g. in ICAO SARPS for this requirement. The likelihood of this water ever being required is remote. The volume of liquid equates to 125ml per person, which would make no difference to their chances of survival.
	GM1-NCO.IDE.B.135 Survival equipment	SIGNALLING EQUIPMENT refers to ICAO Annex 2, Rules of the Air. Should the Standardised European Rules of the Air (SERA) also – or instead - be referred to?	Clarification

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	Name: UK CAA		
Document	Reference	Proposal / comment	Justification
		SERA is referenced in CRD to NPA 2009-02b CRD a.1 – Explanatory Note.	
	GM2-NCO.IDE.B.135	It is proposed that where the term ‘Competent Authority’ is used in this section that it be replaced by ‘State’.	Search and Rescue is a State responsibility and fulfilled in a manner adopted by that State.