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Title	Sterile Flight Deck Procedures
NPA Number	NPA 2012-06

UK CAA (European.Affairs@caa.co.uk) has placed **9** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
77	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 18/19</p> <p>Paragraph No: AMC1.ORO.GEN.110 (f) and GM1.ORO.GEN.110 (f), Operator responsibilities</p> <p>Comment: Text in different sections has varying words with the same intent.</p> <p>Justification: Limitations in communication with the flight crew includes cases of great urgency, critical situations, essential to safe operation and restricted to safety/security matters.</p> <p>Proposed Text: Align text to use the same words so that there is no confusion in interpretation.</p>	
78	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 18</p> <p>Paragraph No: GM1.ORO.GEN.110 (f) Operator responsibilities (1. Establishment of procedures)</p> <p>Comment: Guidance suggests that cabin and technical crew can only communicate with the flight crew in cases of great urgency.</p> <p>Justification: The GM appears to be more restrictive than AMC1.ORO.GEN.110 (f) which restricts communication to safety or security matters. This would prevent cabin crew from giving checks such as cabin secure, which would invariably be during taxi or after descent through 10,000 feet.</p> <p>Proposed Text: Remove the term 'great urgency' and replace with terminology used in the AMC. Suggest text – "..... call or enter the flight crew compartment to pass on required safety or security information or in critical situations. In such"</p>	
79	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 18</p> <p>Paragraph No: GM1.ORO.GEN.110 (f) Operator responsibilities (2. Pre-flight briefing)</p> <p>Comment: The need to recall the objectives/importance of the sterile flight crew compartment was not crew specific.</p>	

			<p>Justification: Clarification would assist understanding.</p> <p>Proposed Text: Include clarification as to whether this is a flight crew briefing or a briefing to all crew members.</p>	
80	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 18</p> <p>Paragraph No: GM1 ORO.GEN.110(f) 3 b v</p> <p>Comment: Prohibiting eating and drinking is unnecessarily punitive.</p> <p>Justification: Flight crew are able to make a decision if this activity is appropriate at a particular stage of flight.</p> <p>Proposed Text: Delete paragraph 3 b v 'eating and drinking' in its entirety.</p>	
81	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 19</p> <p>Paragraph No: GM1 ORO.GEN.110(f) 3 b viii</p> <p>Comment: Prohibiting use of Electronic Flight Bag unless 'urgently necessary' is inappropriate.</p> <p>Justification: If the Electronic Flight Bag is the primary source of navigation charts it will always be required during departure, climb, approach and landing phases of flight.</p> <p>Proposed Text: Delete the word 'urgently'.</p>	
82	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 19</p> <p>Paragraph No: GM1.ORO.GEN.110 (f) Operator responsibilities (4. Communication to the flight crew)</p> <p>Comment: Guidance suggests that cabin and technical crew can only communicate with the flight crew in critical situations.</p> <p>Justification: The GM appears to be more restrictive than AMC1 ORO.GEN.110 (f) which restricts communication to safety or security matters. This would prevent cabin crew from giving checks such as cabin secure, which would invariably be during taxi or after descent through 10,000 feet.</p> <p>Proposed Text: Add another section to permit communication when required to pass on safety or security information.</p>	
83	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 19</p> <p>Paragraph No: GM1 ORO.GEN.110(f) 4 i</p> <p>Comment: Contacting the flight crew for 'unruly passenger' may be inappropriate.</p> <p>Justification: Flight crew should only be contacted if the 'unruly passenger' actually constitutes a threat to the</p>	

			<p>safety of the flight, not for bad behaviour such as using offensive language.</p> <p>Proposed Text: Replace 'unruly passenger' with 'disruptive passenger who poses a threat to flight safety'</p>	
84	B. Draft Opinion and Decision - II. Draft Decision	18 - 23	<p>Page No: 20</p> <p>Paragraph No: GM1.CAT.GEN.MPA.125 Taxiing of aircraft</p> <p>Comment: Safety-critical activity is new terminology which has no associated definition.</p> <p>Justification: Critical phases of flight has a definition included in Annex 1 of the Air Operations Regulation and this new term is directly related to that.</p> <p>Proposed Text: Include a definition of Safety-critical activity.</p>	
132	C. Regulatory Impact Assessment - 5 Analysis of impacts	27 - 29	<p>Page No: 28</p> <p>Paragraph: Section 5.1 Safety impact</p> <p>Comment: The UK CAA supports Option 2</p>	