

Name: UK CAA			
Document: CRD b.4 - Part-SPA			
Reference		Proposal / Comment	Justification
Page No.	Paragraph No.		
8	SPA.GEN.105 (c)	Amend reference OR.OPS.MLR.220 to OR.OPS.MLR.115.	Correction as refers to non-existent paragraph.
10	SPA.PBN.105	<p>The requirement to show that the equipment meets the performance standard has been omitted.</p> <p>Include new sub-paragraph (a) and renumber subsequent paragraphs:</p> <p>(a) <i>the navigation equipment meets the required performance;</i></p> <p>(a)(b) the relevant airworthiness approval of the RNAV system has been obtained;</p> <p>(b)(c) a training programme for the flight crew involved in these operations has been established; and</p> <p>(e)(d)</p>	Correction and alignment with requirement at similar paragraph SPA.MNPS.105.

18	SPA.DG.100(b)(2)(iii)	<p>Sub-paragraph (2) requires the operator to establish procedures containing information and instructions on:</p> <p>(iii) the information in the event of an aircraft</p> <p>Amend sub-paragraph (iii) to read:</p> <p>(iii) actions to be taken in the event of an aircraft</p>	<p>Multiple use of the word information is tautologous and does not convey the intention of the requirement.</p>
18	SPA.DG.105 (d)	<p>Add words as follows:</p> <p>.....obtain access to it within a reasonable period until such time as the goods have reached their final destination</p>	<p>Clarification that retention of the Transport Document is time related</p>
20	SPA.NVIS.100 (a)	<p>Change night VFR to night VMC</p>	<p>It is more appropriate to ensure flight under visual met conditions whilst aided by NVGs than fly under an operating rule. In some states it could be appropriate to fly under special VFR or IFR whilst maintaining night VMC.</p>
21	SPA.NVIS.110 (e)	<p>Amend to read:</p> <p>(1) a back-up or secondary power sources for the each set of night vision goggles (NVG);</p> <p>(2) an NVIS adjustment kit or eye lane;</p> <p>(3) a helmets with the appropriate NVG attachments</p>	<p>Clarification.</p>

21	SPA.NVIS.120 (a)	<p>Amend sentence to read:</p> <p>(a) operations shall not be conducted below the visual flight rules (VFR) weather minima meteorological conditions (VMC) for the type of night operations being conducted performed.</p>	<p>It is more appropriate to ensure flight under VMC whilst aided by NVGs rather than under an operating rule. In some states it could be appropriate to fly under special VFR or IFR whilst maintaining night VMC.</p>
30	SPA.HEMS.150(a)(2)	<p>Conditions for 20 minutes Final Reserve Fuel should be confined to Day VFR only.</p>	<p>Night conditions do not provide continuous and suitable precautionary landing sites as one cannot assess the surface suitability (a black hole may be a lake or covered by wires) nor the location of obstacles without the use specific technical equipment such as FLIR, Searchlight and Wire detection systems and associated procedures, the deployment of which would negate the continuous availability aspect of the requirement.</p>
36	AMC1-SPA.RVSM.105 RVSM operational approval	<p>Amend para 2 title to read “Description of RVSM aircraft equipment.”</p> <p>Amend Para 2 to read “A description of the aircraft RVSM system appropriate to operations in an RVSM environment. Equipment standards are defined in SPA.RVSM.110 expanded at AMC1-SPA.RVSM.105.”</p>	<p>The description of RVSM equipment points at a subset of the minimum equipment requirements at AMC-SPA.RVSM.110 and not at the minimum RVSM equipment that is defined at SPA.RVSM.110. An operator could infer that you only need to describe the two altimeters and not all the mandated minimum RVSM equipment.</p>
40	GM1-SPA.RVSM.105 RVSM operational approval. Para 2.	<p>Replace paragraph 2 with:</p> <p><i>For the North Atlantic minimum navigation performance specification (MNPS) airspace comprehensive guidance for operators and competent authorities is contained in the ICAO Document NAT 007(MNPS).</i></p>	<p>The ICAO Document NAT001 and MNPS Ops Manual were merged into one document, Document NAT 007(MNPS), in Oct 10.</p>

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91	AMC1-SPA.NVIS.140	<p>Include additional sentences:</p> <p>(11) NVG battery use log.</p> <p>(12) Profiles acceptable for NVIS approaches / departures.</p>	<p>Some NVG manufacturers require a log of battery use as a means of predicting power available.</p> <p>Some current AFM supplements specify particular profiles to ensure the optimum sight picture under NVG flight.</p>
129	AMC1-SPA.HEMS.130(f) 3.	<p>Amend first line should read:</p> <p>HHO HEMS technical crew members should be trained in the following items:"</p>	Correction.