

Reaction form | CRD OPS III

Name: UK CAA			
Document	Reference	Proposal / comment	Justification
Explanatory Note to CRD OPS III (CRD a.1)	103	<p>The Agency's comment that there are no IFR flights with Sailplanes is incorrect. The Agency is reminded that an aircraft is flying in IMC whenever it is in cloud or above cloud (i.e. surface not in sight) and whenever it is flying above 3000ft AMSL and closer than 1000ft vertically or 1500m horizontally from cloud. When doing so it is flown in accordance with the Instrument Flight Rules. It is perfectly normal practice for any aircraft to be operated in this way.</p> <p>Flight along a route or procedure that requires a pilot to navigate accurately by reference to instruments (e.g. airways, SIDs, STARS, ILS) is a completely different matter and of course sailplanes and balloons are generally not suited to or equipped for this type of operation.</p> <p>The Agency has consistently confused these two very distinctly different types of operation by referring to them both simultaneously as 'IFR Flight'. It is very important that the differences are recognised and accounted for so as not to unjustifiably burden the operators of sailplanes, balloons and other recreational aircraft.</p>	
	175	SPO.OP.145 and SPO.OP.146 should be SPO.OP.155 and SPO.OP.156 respectively.	Accuracy.
	212	The use of the term MOPSC is limited to those operators required to utilise an Operations	Simplicity and alignment with normal operations.

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		<p>Manual. This is in effect all operations other than Part-NCO.</p> <p>For Part-SPO there are also requirements for 'stations' as well as 'seats' which presents additional challenges to equipment requirements etc.</p> <p>For simplicity, it is recommended that alignment with the normal operation of the aircraft is maintained as much as possible and that MOPSC be expanded to include 'seats' or 'stations' and that for Part-NCO type operations the basis remains 'maximum certificated passenger seating configuration'.</p>	
	241	<p>Concerns were raised in the CRST regarding the introduction of a requirement for 'Crash Mitigation Equipment'.</p> <p>Whilst changes have been made in the text and associated AMC, the fundamental problems of proportionality and relevance remain. This is made worse by the inclusion of 'NCC' and 'NCO' non-commercial operations within Part-SPO.</p> <p>The principle of risk mitigation is supported but the rule as written confuse 'design' standards with 'equipment' standards and fitment.</p> <p>This requirement has not been justified and will present an inordinate burden and</p>	<p>The requirement has not been justified or properly defined and presents an unreasonable demand on operators. The principle belongs to design and certification specification and not to 'equipment' requirements.</p>

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		<p>constraint on operators and probably prevent many aircraft from continuing to carry out flying tasks which they do today safely.</p> <p>It is strongly recommended that this requirement be removed entirely and reliance placed on improving 'Design' specifications contained in airworthiness certification standards.</p> <p>This does not stop an operator conducting a risk assessment of his own operations and tasks and deciding on what type of aircraft he should utilise and what types of additional requirements he should specify. This should also include performance considerations.</p>	
	Acronyms and Abbreviations - CAT	It is not clear that the definition of CAT is aligned with definition used elsewhere in the EASA IRs, in particular in Article 2.1 of the draft Cover Regulation for air operations.	Consistency.
	Acronyms and Abbreviations – SALS and SALSF	<p>SALS is defined as 'simple approach light system'.</p> <p>SALSF is defined as 'short approach light system with ...'.</p> <p>Should they both be 'simple' or both be 'short'?</p>	Consistency.