EASA

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Title	(A) Authority, Organisation and Operations Requirements for Aerodromes - Explanatory Note
NPA Number	NPA 2011-20 (A)

UK CAA (European.Affairs@caa.co.uk) has placed **2** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
36	A. Explanatory Note - II. Process and scope	5 - 6	**Page No:** 6 **Paragraph No:** 9 **Comment:** The term "commercial air transport" is used by EASA in this note and in Certification Specifications, but not defined. We assume that EASA is using the definition included in the Cover Regulation for OPS – 'Commercial air transport (CAT) operation' means an aircraft operation to transport passengers, cargo or mail for remuneration or other valuable consideration. This definition should be clarified in the appropriate place. **Justification:** The definition is important because it affects which aerodromes are within scope, for example those which are used exclusively by cargo aircraft (aircraft undertaking cargo operations without passengers). The UK CAA considers clarity on the definition important for the clarity of provisions contained in the NPA, particularly with reference to the levels of RFF cover required for Cargo operations only.	
37	A. Explanatory Note - III. Overview of the rules proposed in this NPA - Comparison with ICAO	6 - 8	**Page No:** 7 **Paragraph No:** 16. Second Bullet **Comment:** As an Alternative Means of Compliance can be proposed by an operator it should be for the competent authority to accept it and notify the agency. **Justification:** The acceptance of an alternative Means of Compliance where proposed by an aerodrome operator should follow a process that includes the assessment of that alternative by the competent authority before it is submitted to the agency. **Proposed Text:** In the final sentence change "...uses.." to "...uses or accepts..."	

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