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<b>Title</b>	TAWS operation in IFR and VFR, and TAWS for turbine-powered aeroplanes under 5 700 kg MCTOM able to carry six to nine passengers
<b>NPA Number</b>	NPA 2015-21

**UK CAA** (European.Affairs@caa.co.uk) has placed **6** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
18	4. Regulatory impact assessment (RIA) - 4.1. Issues to be addressed	7 - 10	<p><b>Page No:</b> 8</p> <p><b>Paragraph No:</b> Issue 2, paragraph 2 beginning "In the past, although pilots ...."</p> <p><b>Comment:</b> The UK CAA recommends that substantiation data to support these statements should be provided or the Agency should clarify whether they are based on anecdotal evidence or opinions.</p> <p><b>Justification:</b> To improve transparency and objectiveness.</p>	
19	4. Regulatory impact assessment (RIA) - 4.1. Issues to be addressed	7 - 10	<p><b>Page No:</b> 8</p> <p><b>Paragraph No:</b> Issue 2, paragraph 5 beginning "However, updated information..."</p> <p><b>Comment:</b> The UK CAA recommends that substantiation data to support these statements should be provided or the Agency should clarify whether they are based on anecdotal evidence or opinions.</p> <p><b>Justification:</b> To improve transparency and objectiveness</p>	
20	4. Regulatory impact assessment (RIA) - 4.1. Issues to be addressed	7 - 10	<p><b>Page No:</b> 9</p> <p><b>Paragraph No:</b> 4.1.3, paragraph 1, sentence beginning - "Manufacturers selling in Europe and the US follow the recommendation from ICAO and offer this system with their new aircraft"</p> <p><b>Comment:</b> It is recommended that the Agency should clarify if this is a fact or an assumption based on the survey results or other anecdotal evidence or opinions.</p> <p><b>Justification:</b> To improve transparency and objectiveness.</p>	
21	4. Regulatory impact assessment (RIA) - 4.3. Policy options	10 - 11	<p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> 1, sentence beginning "As there have been no accidents with aircraft performing non-commercial operations in the last ten years..."</p> <p><b>Comment:</b> UK CAA believes that the intended meaning is accidents that could have been prevented using TAWS, and suggests the text should be amended as shown below.</p> <p><b>Justification:</b> To improve accuracy and clarity.</p> <p><b>Proposed Text:</b> "As there have been no accidents with aircraft</p>	

			performing non-commercial operations in the last ten years <b>that could have been prevented using TAWS ..."</b>	
22	4. Regulatory impact assessment (RIA) - 4.3. Policy options	10 - 11	<p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> 3, sentence beginning "... However, all new aircraft are fitted with TAWS A or B..."</p> <p><b>Comment:</b> It is unclear whether this statement is based on the results of the survey and if so, whether the survey included responses from all aircraft manufacturers selling in Europe. If the statement is not based on the survey results, the UK CAA requests clarification on what this statement is based on.</p> <p><b>Justification:</b> The accuracy of this statement is very important for the safety impact assessment of the various regulatory options.</p>	
23	4. Regulatory impact assessment (RIA) - 4.5. Analysis of impacts	12 - 16	<p><b>Page No:</b> 12</p> <p><b>Paragraph No:</b> 4.5.1, paragraph 3, sentence beginning "Moreover, aircraft in Europe would not be obliged to have the system repaired in case of breakdown. Nevertheless, these possibilities are assumed to be very rare"</p> <p><b>Comment:</b> The UK CAA believes the assumption that operators will very rarely deactivate the system may not be entirely accurate. This assumption may influence the outcome of the safety impact assessment.</p> <p>It is recommended that the Agency reconsiders the likelihood of having a deactivated system and reviews the safety impact assessment accordingly</p> <p><b>Justification:</b> We tend to agree that the deactivation of the system because of a breakdown is unlikely. However, TAWS require periodic terrain/obstacle/runway database updates which are costly, especially for non-commercial operators who obtained the system as a "bonus" (fitted in the aircraft by default although not legally required in Europe). Out of date obstacle (or runway) data can be a fairly common source of nuisance alerts (in comparison to hard failures) and therefore could be a more compelling reason for deactivating the system.</p>	