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<b>Title</b>	All-weather operations - Non-commercial operations with other than complex motor-powered aircraft
<b>NPA Number</b>	NPA 2020-02

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

<b>Cmt:</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachments</b>
24	3.1 Draft Regulation - Annex VII - AMC1 NCO.IDE.A.195	43 - 45	<p><b>Page No:</b> 43</p> <p><b>Paragraph No:</b> AMC1 NCO.IDE. A.195(a) Navigation equipment</p> <p><b>Comment:</b> In developing AMC guidance in Part-NCO for the use of RNAV equipment to provide a means of substituting conventional navigation aid information, we recommend similar action should be taken to address this subject in Parts CAT, NCC and SPO. In particular, Part-CAT AMC2 to CAT.IDE.A.345 (d)(2) is much more restrictive. We suggest guidance equivalent to Part-CAT is also needed</p> <p>With 3 NPAs so far published dealing with differing aspects of AWO, it is recommended that a consolidation exercise be conducted to harmonise wherever possible and to use the best procedures across the domains.</p> <p><b>Justification:</b> Standardisation and equivalence</p>	
25	3.1 Draft Regulation - Annex VII - AMC1 NCO.IDE.A.195	43 - 45	<p><b>Page No:</b> 43</p> <p><b>Paragraph No:</b> AMC1 NCO.IDE. A.195(a) Navigation equipment</p> <p><b>Comment:</b> The heading under AMC1 (Fix Substitution) is considered inappropriate and misleading. UK CAA recommends that the heading "RNAV Substitution" is used in its place and the term RNAV Substitution is used throughout the AMC1.</p> <p><i>Note: The FAA comparable guidance contained in Advisory Circular AC 90-108 Change 1, is titled "Use of Suitable Area Navigation (RNAV) Systems on Conventional Routes and Procedures. The AC talks of "Use of a suitable RNAV system as a Substitute Means of Navigation" or "Use of a suitable RNAV system as an Alternate Means of Navigation".</i></p> <p><b>Justification:</b> In the opening sentence, AMC1 talks to Area Navigation systems. A "Fix" is defined by EUROCAE and RTCA as a generic name for a geographical position. A fix is referred to as either a fix, a waypoint, intersection or reporting point etc. AMC 1 is clearly speaking to the navigation equipment to fly either to/from a Fix or else a route or procedure. A more suitable heading is RNAV Substitution reflecting the fact that it is the use of RNAV equipment that allows the substitution to be made and enables navigation via RNAV Fix(es).</p>	

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26	3.1 Draft Regulation - Annex VII - AMC1 NCO.IDE.A.195	43 - 45	<p><b>Page No:</b> 43</p> <p><b>Paragraph No:</b> AMC1 NCO.IDE. A.195(a) Navigation equipment</p> <p><b>Comment:</b> Notwithstanding the UK CAA comment on AMC1 NCO.IDE. A.195(a) subparagraph (e) regarding practicality and viability of the pilot-in-command responsibilities, it is unclear whether there are any plans to develop additional training to be defined before a pilot-in-command can apply RNAV substitution. In providing a means of substituting conventional guidance, we recommend there should at least be Theoretical Knowledge and practical training identified for such applications. If nothing else, the pitfalls from mis-application of RNAV Substitution need to be incorporated in relevant training programmes as well as "specific-to-type" equipment familiarisation.</p> <p><b>Justification:</b> Assurance of correct and safe application of procedures</p>	
27	3.1 Draft Regulation - Annex VII - AMC1 NCO.IDE.A.195	43 - 45	<p><b>Page No:</b> 44</p> <p><b>Paragraph No:</b> AMC1 NCO.IDE. A.195(a) Navigation equipment subparagraph (e)</p> <p><b>Comment:</b> Without the use of specialised navigation data base tools, the UK CAA questions the practicality and viability of the pilot-in-command responsibilities regarding assuring either the correctness of the coordinates of any fix or verifying waypoint sequence, reasonableness of track angles, and distances of any overlay procedure used. On more modern equipment with full depiction of procedures on moving map displays, this may indeed be possible, but accounting for early models of (E)TSO-C129a and (E)TSO-C146() equipment, it is difficult to see how this can be achieved.</p> <p><b>Justification:</b> Clarity of purpose and intent</p>	

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28	4.3 IA - How it could be achieved—optio	49 - 54	<p><b>Page No:</b> 52</p> <p><b>Paragraph No:</b> 4.3.8, Introduction of AMC on GNSS fix substitution</p> <p><b>Comment:</b> In this element of the IA, mention is made of the FAA experience. Whilst the FAA AC 90-108 Change 1 is still applicable, it should be noted that there are some fundamental differences between the US and Europe that has made use of RNAV substitution under FAA rules, easier. Firstly, the US has tended to additionally provide GPS procedures for their non-precision approach procedures, so an RNAV equivalent is available, removing the need for conventional navigation aid guidance. It also means that the procedures have been obstacle assessed and the lateral and vertical guidance validated by the FAA themselves. Secondly, the FAA is the State body responsible for promulgation of routes and procedures and is in the position to control and maintain them. In Europe, with different States and different departments and responsibilities, there is much greater variance. Therefore the assurance that the FAA have gained in applying RNAV Substitution does not directly translate into a European environment.</p> <p><b>Justification:</b> Correctness of statements and assumptions in determining risks of change.</p>					
29	4.6 IA - Monitoring and evaluation	56	<p><b>Page No:</b> 55</p> <p><b>Paragraph No:</b> 4.6 Monitoring and evaluation - Table</p> <p><b>Comment:</b> We believe NCO accident rates under IFR should also be monitored</p> <p><b>Justification:</b> In order to monitor the effectiveness of these changes, NCO accident rates under IFR should also be monitored to ensure that there isn't an increase in accident rates here to balance against any decrease in NCO VFR in marginal VMC accident rates.</p> <p><b>Proposed Text:</b> Add:</p> <table border="1" data-bbox="438 1505 1289 1648"> <tr> <td data-bbox="438 1505 758 1648">Number of accidents with other-than complex aircraft under IFR</td> <td data-bbox="758 1505 1098 1648">Reports in ECCAIRS and information collected at Member State level</td> <td data-bbox="1098 1505 1193 1648">EASA and NAAs</td> <td data-bbox="1193 1505 1289 1648">Every 2 years</td> </tr> </table>	Number of accidents with other-than complex aircraft under IFR	Reports in ECCAIRS and information collected at Member State level	EASA and NAAs	Every 2 years	
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