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<b>Title</b>	Transposition of provisions on electronic flight bags from ICAO Annex 6
<b>NPA Number</b>	NPA 2016-12

**UK CAA** (European.Affairs@caa.co.uk) has placed **8** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
86	3. Proposed amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.1. Draft AMC and GM to Part-CAT	17 - 26	<p><b>Page No:</b> 23 of 138.</p> <p><b>Paragraph No:</b> AMC1 CAT.GEN.MPA.141(b) Use of EFBS APPLICATION CLASSIFICATION, sub para (c)(1)</p> <p><b>Comment:</b> The prohibition of applications which display position should be removed.</p> <p><b>Justification:</b> The advances in charting application technology are such that having own-ship position displayed does not present a safety hazard PROVIDED that this is used as a secondary source of information, and the aircraft is fitted with avionics standard equipment which must be treated as the primary source of information. The operator should have procedures to reinforce this.</p> <p><b>Proposed Text:</b> Add additional text as follows:</p> <p>“displaying information which may tactically be used...obstacles or in-flight traffic, <b>unless such applications are used for situational awareness only and the aircraft is fitted with avionics standard equipment which is used as the primary source of position information. Such applications should have a means of removing own-ship position when the position information is unreliable. The operator should develop procedures indicating the primacy of information from avionics equipment should a difference in position be indicated</b>”</p>	
87	3. Proposed amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.1. Draft AMC and GM to Part-CAT	17 - 26	<p><b>Page No:</b> 25 of 138</p> <p><b>Paragraph No:</b> AMC3 CAT.GEN.MPA.141(b) Use of EFBS – TYPICAL TYPE B EFB APPLICATIONS, sub para (b)</p> <p><b>Comment:</b> The restriction of own-ship position in flight should be removed.</p> <p><b>Justification:</b> Operational use of EFB within other NAAs has shown that the increase in situational awareness brought by own-ship EFB displays far outweighs any potential risks provided that mitigating operational procedures are developed.</p> <p><b>Proposed Text:</b> The sentence “but without a display of aircraft/own-ship position except in the specific case of day VFR operations only” should be deleted.</p>	
88	3. Proposed amendments — 3.2. Draft	26 - 56	<p><b>Page No:</b> 41 of 138</p> <p><b>Paragraph No:</b> AMC4 SPA.EFB.100(b)(3) Use of EFBS – operational</p>	

	Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.2. Draft AMC and GM to Part-SPA		<p>approval FLIGHT CREW TRAINING, sub para (a)(3)</p> <p><b>Comment:</b> Training should be included to indicate the limitations of own-ship position.</p> <p><b>Justification:</b> To emphasise the primacy of avionics standard equipment information over that provided by the EFB.</p> <p><b>Proposed Text:</b> Add additional text as follows:</p> <p>‘(3) limitations of the system, <b>specifically the limitations of any own-ship position displayed by the EFB, and the primacy of information from installed avionics standard equipment”</b></p>	
89	3. Proposed amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.2. Draft AMC and GM to Part-SPA	26 - 56	<p><b>Page No:</b> 48 of 138</p> <p><b>Paragraph No:</b> AMC6 SPA.EFB.100(b)(3) Use of EFBs – operational approval AIRPORT MOVING MAP DISPLAY (AMMD) APPLICATION WITH OWN-SHIP POSITION</p> <p><b>Comment:</b> This section should be expanded to include requirements for own-ship position for all phases of flight and a full re-write is recommended.</p> <p><b>Justification:</b> Essential if own-ship position is permitted in all phases of flight.</p>	
90	3. Proposed amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.3. Draft AMC and GM to Part-NCC	57 - 74	<p><b>Page No:</b> 65 of 138</p> <p><b>Paragraph No:</b> AMC3 NCC.GEN.131(b)(2) Use of EFBs – FLIGHT CREW TRAINING, sub para (c)</p> <p><b>Comment:</b> Training should be included to indicate the limitations of own-ship position.</p> <p><b>Justification:</b> To emphasise the primacy of avionics standard equipment information over that provided by the EFB.</p> <p><b>Proposed Text:</b> Add additional text as follows:</p> <p>‘(c) limitations of the system, <b>specifically the limitations of any own-ship position displayed by the EFB, and the primacy of information from installed avionics standard equipment”</b></p>	
91	3. Proposed amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.3. Draft AMC and GM to Part-NCC	57 - 74	<p><b>Page No:</b> 69 of 138</p> <p><b>Paragraph No:</b> AMC5 NCC.GEN.131(b)(2) Use of EFBs AIRPORT MOVING MAP DISPLAY (AMMD) APPLICATION WITH OWN-SHIP POSITION</p> <p><b>Comment:</b> This section should be expanded to include requirements for own-ship position for all phases of flight and a full re-write is recommended.</p> <p><b>Justification:</b> Essential if own-ship position is permitted in all phases of flight.</p>	
92	3. Proposed	77 -	<p><b>Page No:</b> 85 of 138</p>	

	amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.5. Draft AMC and GM to Part-SPO	94	<p><b>Paragraph No:</b> AMC3 SPO.GEN.131(b)(2) Use of EFBs – FLIGHT CREW TRAINING, sub para (c)</p> <p><b>Comment:</b> Training should be included to indicate the limitations of own-ship position.</p> <p><b>Justification:</b> To emphasise the primacy of avionics standard equipment information over that provided by the EFB.</p> <p><b>Proposed Text:</b> Add additional text as follows:</p> <p>‘(c) limitations of the system, <b>specifically the limitations of any own-ship position displayed by the EFB, and the primacy of information from installed avionics standard equipment</b>”</p>	
93	3. Proposed amendments — 3.2. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) — 3.2.5. Draft AMC and GM to Part-SPO	77 - 94	<p><b>Page No:</b> 89 of 138</p> <p><b>Paragraph No:</b> AMC5 SPO.GEN.131(b)(2) Use of EFBs AIRPORT MOVING MPA DISPLAY (AMMD) APPLICATION WITH OWN-SHIP POSITION – COMPLEX AIRCRAFT</p> <p><b>Comment:</b> This section should be expanded to include requirements for own-ship position for all phases of flight, and a full re-write is recommended.</p> <p><b>Justification:</b> Essential if own-ship position is permitted in all phases of flight</p>	