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Title	Implementing Rules for Air Operations of Community Operators - Part-OPS
NPA Number	NPA 2009-02b

Danish Powerflying Union (dmu@mail.dk) has placed **13** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
6564	B. I. Draft Opinion - Part-OPS - Subpart A - Section I - OPS.GEN.010 Definitions	22 - 27	(45) (i): In some parts of the Nordic countries there are daylight 24 hours during Summer, eg. for 1-3 month. We see no reason to define a local flight to start and end on the same day.	
6579	B. I. Draft Opinion - Part-OPS - Subpart A - Section I - OPS.GEN.010 Definitions	22 - 27	(49): "Night" to be defined as 30 minutes after sunset and 30 minutes before sunrise is not acceptable in the Nordic countries. Today the degree of latitude is taken into consideration. In the Nordic countries the sun sets slower, which means our twilight period is longer compared to southern part of Europe. Forexample July 2 2009 (West of 11 degree East) "night" starts 1 hour and 2 minutes after sunset and ends 1 hour and 2 minutes before sunrise. This gives a considerably longer VFR day period compared to the definition in this NPA. We strongly recommend EASA to take the degree of latitude into consideration.	
5873	B. I. Draft Opinion - Part-OPS - Subpart A - Section I - OPS.GEN.025 Common language	29	We agree on the suggestion that crew members use a common language.	
1747	B. I. Draft Opinion - Part-OPS - Subpart A - Section II - OPS.GEN.147 Visual Flight Rules (VFR) Operating minima	32 - 33	Tabel 1, OPS.GEN.147 Visual Flight Rules (VFR) Operation Minima is not identical to ICAO Annex 2 Rules of the air. We assume it is an editorial mistake and encourage EASA to set regulations for Visual Flight Rules according to ICAO standards. The current Danish regulation permit aircrafts established in the aerodrome traffic circuit, to fly with a flight visibility of at least 1.5 KM clear of cloud and with the aerodrome in sight. This works without problems and should also be possible in the future regulations.	
5872	B. I. Draft Opinion - Part-OPS -	39	We suggest weighing at least every 5 years, which are the limitation today.	

	Subpart A - Section III - OPS.GEN.305 Weighing			
658	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.400 Instruments and equipment - General	41	There is no need for approved equipment to determine a flightpath or to navigate under VFR conditions. Updated GPS equipment and a chart is sufficient. We suggest the following text in (a) (1): (1) control or, in case of a non-commercial VFR flight , determine the flight path.	
7318	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.415 Flight instruments and equipment - VFR night flights and IFR flights	43 - 44	(b) In several aeroplanes/aircrafts, especially other than complex motor-powered aircrafts, it will be difficult or impossible to fit a stationary chart holder in an easily readable position without interfering access to other equipment/functions during flight. Instead we suggest following text: (b) shall be equipped with a stationary light, supplied from the aircrafts electrical system, to provide illumination for charts.	
5878	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.420 Flights over water	44 - 45	Electric illumination of floating devices is a good safety. But it is demanding to maintain the equipment and therefore we suggest illumination or use of chemical light to be an option instead of a demand.	
5879	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.480 Seat belts and harnesses	50	We are uncertain of the interpretation of "Single point release" and therefore we recommend following text: (b) Safety belts with shoulder harnesses shall be easy to release. Seatbelts with shoulder harness which are allowed according to the national regulations shall have grandfather rights untill date of expire. Justification: This to prevent aircraft owners to come into a situation where they are forced to have an unnecessary expense replacing seatbelts which are presently approved.	
5874	B. II. Draft Decision - Part-OPS - Subpart A - Section I - GM OPS.GEN.020 (a) Crew responsibilities	112	We support the suggestion of no consumption of alcohol while on duty or less than 8 hours prior to commencing a flight and a limitation of 0,2 per mille.	
5875	B. II. Draft	200	We also find use of a wrist watch displaying hours, minutes	

	Decision - Part-OPS - Subpart A - Section IV - AMC OPS.GEN.410 (a)(2) Flight instruments and equipment - VFR flights		and seconds sufficient for operating other than complex motor-powered aircrafts on VFR flights.	
5876	B. II. Draft Decision - Part-OPS - Subpart A - Section IV - AMC OPS.GEN.410 (a)(3) Flight instruments and equipment - VFR flights	200	We see no reason to demand pressure altitude to be displayed in feet (ft) only. We suggest following text: The instrument measuring and displaying pressure altitude should be calibrated in feet (ft) or meters (m) , with a sub-scale....	
5877	B. II. Draft Decision - Part-OPS - Subpart A - Section IV - AMC OPS.GEN.410 (a)(4) Flight instruments and equipment - VFR flights	200	Air Speed indication in miles per hours should also be accepted for other than complex motor-powered aeroplanes.	