



## COMMENT RESPONSE DOCUMENT

EASA SC-RPAS.CNS-01

[Published on the 26-04-2016 and officially closed for comments on the 17-05-2016]

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

*Comment # 1*

**Paragraph No:** SC-RPAS.CNS-01 c)

**Comment:** Item c) could be rephrased. For example, in the case of a global GNSS collapse, there is no real failure on board the RPA, just the signal is gone. It is not really a failure of the equipment (unless the definition of failure of an equipment in the EASA framework includes this situation) you want to say, but that the primary navigation equipment is no longer able to provide the required navigation solution.

**Justification:** As above

**Proposed Text (if applicable):** None

*EASA response: not accepted: the scenario described should be addressed in the operational risk assessment Nevertheless, the text will be rephrased for clarity.*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

*Comment # 2*

**Paragraph No:** GM to SC-RPAS.CNS-01, 1. Definitions, GCS

**Comment:** Although it is mentioned in the definition that the GCS has alternate names in ICAO (i.e. RPS), I believe it is better for future interoperability in regulation to use the agreed wording in ICAO. In addition, GCS implies that the control station is on the ground which is an assumption not always met: sea surface, other aircraft are potential viable location for the RPS.

**Justification:** ICAO wording

**Proposed Text (if applicable):** None

*EASA response: Accepted.*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

*Comment # 3*

**Paragraph No:** GM to SC-RPAS.CNS-01, 2. Communication equipment

**Comment:** Section 2 has a generic naming which is confusing with the section 3, which seems to be a component of section 2. Although they are totally different COMS. I suggest to use “RPAS crew communications” for section 2.

**Justification:** As above

**Proposed Text (if applicable):** “RPAS crew communications”

*EASA response: Accepted: title will be reworded*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

*Comment # 4*

**Paragraph No:** GM to SC-RPAS.CNS-01, 2. Communication equipment

**Comment:** Unless elsewhere defined, the term “crew” is too generic. Maybe a foot note pointing to the definition of crew is required (in PART-OPS?).

**Justification:** As above

**Proposed Text (if applicable):** None

*EASA response: Noted: the text has been reworded to provide more clarity*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

**Comment # 5**

**Paragraph No:** GM to SC-RPAS.CNS-01, 2. Communication equipment

**Comment:** Crew communications is also required when inside the RPS.

**Justification:** As above

**Proposed Text (if applicable):** None

*EASA response: Noted: the text has been reworded to provide more clarity*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

**Comment # 6**

**Paragraph No:** GM to SC-RPAS.CNS-01, 2. Communication equipment

**Comment:** The RPS may be not be a single room and also may include all the contingency utilities personnel needed in case of power cuts, or events like this one. It all goes with the definition of the RPS that is restricted to “the equipment used to pilot the RPA”. For RPAS, the RPS is little more than the departed cockpit, it includes many utilities provide in aircraft by the (airworthy) airframe. They all need to be contacted ASAP.

**Justification:** As above

**Proposed Text (if applicable):** None

*EASA response: Not accepted: comment unclear*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

*Comment # 7*

**Paragraph No:** GM to SC-RPAS.CNS-01, 3. Radio communication equipment

**Comment:** I suggest to put the note as paragraph one

**Justification:** None

**Proposed Text (if applicable):** None

*EASA response: Accepted*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

*Comment # 8*

**Paragraph No:** GM to SC-RPAS.CNS-01, 3. Radio communication equipment

**Comment:** I suggest to change “voice” by “voice/data” to cater for CPDLC provision.

**Justification:** None

**Proposed Text (if applicable):** “voice/data”

*EASA response: Not accepted: not applicable*

**Commenter 1 : Eurocontrol (Mr. Colin) – date 27-04-2016**

**Comment # 9**

**Paragraph No:** GM to SC-RPAS.CNS-01

**Comment:** There is no GM for navigation. Is there on purpose?

**Justification:** None

**Proposed Text (if applicable):** None

**EASA response:** *Noted: a paragraph has been added to GM*

**Commenter 2 : AIRBUS Defence & Space (Mr. Labonde) – date 16-05-2016**

**Comment # 10**

**Paragraph No:** SC-RPAS.CNS-01 a)

**Comment:** The navigation equipment should also proceed in accordance with the pilot commands, when semi-automatic flight is applicable.

**Justification:** None

**Proposed Text (if applicable):** None

**EASA response:** *Noted*