



**COMMENT RESPONSE DOCUMENT (CRD)  
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2008-22c & 2009-02c**

**for an Agency Opinion on a Commission Regulation establishing the  
Implementing Rules for organisations in the field of air operations and  
personnel requirements**

**and**

**a draft Decision of the Executive Director of the European Aviation Safety  
Agency on Acceptable Means of Compliance and Guidance Material  
related to the Implementing Rules for organisations in the field of air  
operations and personnel requirements**

*“Organisation Requirements”*

**CRD c.3 – List of commentators for Part-OR**

*List of commentators for Part-OR*

1. ACI EUROPE
2. ADAC Luftrettung GmbH
3. Adventia, European College of Aeronautics
4. AEA
5. AECA helicopters.
6. AECA(SPAIN)
7. AEI
8. Aéro.Sport asbl. Luxembourg
9. Aero-Club of Switzerland
10. Air Atlanta/Haukur Eyjólfsson
11. Air Berlin PLC & Co. Luftverkehrs KG
12. Air Berlin Technik
13. AIR FRANCE
14. Air Grischia Helikopter AG
15. AIR SAFETY GROUP
16. Air Southwest
17. Air Via
18. Air Zermatt
19. AIRBUS
20. Air-Glacières (pf)
21. Airlec Air Espace / Paul Tiba
22. ALFA-HELICOPTER, spol. s r.o.
23. ALSIM Simulateurs
24. Alteon
25. ANE (Air Nostrum) OPS QM
26. Antonio Sousa
27. AOPA Switzerland
28. AOPA-Sweden
29. Arbeitsgemeinschaft Deutscher Verkehrsflughäfen e.V.
30. Asociación Española de Pilotos de Aerostación (AEPA)
31. Association of Asia Pacific Airlines
32. Association of Dutch Aviation Technicians NVLT
33. AUSTRIAN Airlines
34. Austro Control GmbH
35. Avinor AS
36. Axel Ockelmann + Manfred Poggensee Commercial Balloon Operators  
Germany
37. Axel Schwarz

*List of commentators for Part-OR*

38. Baden-Württembergischer Luftfahrtverband
39. BALPA
40. barry birch
41. Bayerisches Staatsministerium für Wirtschaft, Infrastruktur, Verkehr und Technologie
42. BDF - German Airline Association
43. Benedikt SCHLEGEL
44. Berner Oberländer Helikopter AG BOHAG
45. BM Aviation
46. bmi
47. bmi REGIONAL
48. BMVBS (MoT Germany)
49. BMW AG
50. Boeing
51. Bristow Academy
52. Bristow Helicopters
53. BRITISH AIRWAY
54. British Airways
55. British Airways Flight Operations
56. British Airways Safety & Security
57. British Gliding Association
58. CAA Belgium
59. CAA CZ
60. CAA Finland
61. CAA Norway
62. CAA-NL
63. CAE
64. CANSO
65. Catherine Nussbaumer
66. cfdt france
67. CHC Europe EASA Ops Team - representing 550 pilots across Europe
68. Chris Brooks
69. Christian Hölzle
70. Christophe Baumann
71. Cirrus Design Corporation
72. CityJet
73. Civil Aviation Authority Finland
74. Civil Aviation Authority of Norway

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75. Civil Aviation Authority of Norway
76. claire.amos
77. CMO/AMC and President of Danish Aviation & Marine Medical Association
78. Condor Flugdienst GmbH - FRA HO/R
79. Continuous Security GmbH
80. CRM Advisory Panel to the United Kingdom Civil Aviation Authority
81. CTC Aviation Services Ltd
82. CUD
83. Danish Balloon Organisation
84. Danish Powerflying Union
85. Dassault Aviation
86. David COURT
87. DCA Malta
88. DCAA
89. DC-AL
90. Department for Transport UK
91. Deutsche Lufthansa AG
92. Deutscher Aero Club Landesverband Niedersachsen
93. DFS Deutsche Flugsicherung GmbH
94. DGAC
95. DGAC FRANCE
96. Dirk Hatebur
97. DSvU / Lars Agesen-Pagh
98. EAAPS
99. easyjet safety
100. ECA- European Cockpit Association
101. Egon Schmaus
102. EHOC
103. Elaine Allan Monarch
104. Eliticino SA
105. Embraer - Indústria Brasileira de Aeronáutica - S.A.
106. ENAC TLP
107. EPFU is the European Union of national powered flying organisation from the 10 main European countries
108. ERA
109. ERA
110. ETF
111. ETPS CI

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112. EUROCONTROL
113. EUROCOPTER
114. Europe Air Sports PM
115. European Balloon Corporation
116. European Business Aviation Association (EBAA)
117. European CMO Forum
118. European Federation of Airline Dispatcher's Associations
119. EUROPEAN GLIDING UNION
120. European Gliding Union (EGU)
121. European HF Advisory Group
122. European Regions Airline Association
123. European Sailplane Manufacturers
124. European Transport Worker's Federation
125. Eurowings Luftverkehrs AG
126. FAA
127. Federal Office of Civil Aviation (FOCA), Switzerland
128. fédération des transports CGT, membre de ETF
129. Fédération Française Aéronautique
130. FINNAIR
131. Finnish CAA
132. FlightSafety International
133. Flintshire Flying School Ltd
134. Flygteoriskolan Barkarby AB
135. FNAM (Fédération Nationale de l'Aviation Marchande)
136. Frank Ciupka
137. Frank Schweppe
138. Fraport AG
139. French gov - DGA - FRENCH FLIGHT TEST CENTER
140. French SAMU using helicopters for medical transport
141. Fridrich Jan
142. FSC - CCOO
143. GAAC
144. GE Aviation
145. George Knight
146. Giorgio Clementi
147. Gordana BOBERIC
148. Graham HALLETT
149. Great Circle Services AG

*List of commentators for Part-OR*

150. Greger Ahlbeck
151. Gregor Rozina
152. Hans MESSERLI
153. HDM Luftrettung gGmbH
154. Heli Gotthard
155. Heli Gotthard AG Erstfeld
156. Helikopter Air Transport GmbH / Christophorus Flugrettungsverein
157. Heliswiss
158. Heliswiss AG, Belp
159. Heliswiss International
160. Heliswiss NV
161. Henning Romme-Mølby
162. Holger Scheibel
163. IACA International Air Carrier Association
164. IAOPA Europe
165. IATA
166. Iberworld Airlines
167. Icelandair
168. Icelandic CAA
169. INAER
170. Ingo Pucks
171. International Air Transport Association (IATA)
172. Irish Aviation Authority
173. James Carrie
174. Jan Ahlquist, QM, Blue Chip Jet HB
175. Jan Brühlmann
176. Jill Pelan
177. Juergen Hauk
178. K Franzen
179. kapers Cabin Crew Union
180. Karl Wagner
181. Keven BAINES - MD Baines Simmons Limited
182. Klaus HARTMANN
183. KLM
184. KLM Cityhopper
185. KLM Engineering & Maintenance
186. Konrad Polreich
187. Krikor MICHIKIAN

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188. LHT
189. Light Aircraft Association of the Czech Republic
190. Light Aircraft Association UK
191. Loganair Limited
192. Luftamt Nordbayern
193. Luftfahrt-Bundesamt
194. Lufthansa CityLine GmbH
195. M Wilson-NetJets
196. Maarten
197. Márcia Nunes
198. Marduc Aeronautical Consults
199. Michael Hoeck
200. Michel Lacombe AF TRTO
201. MOT Austria
202. MVA
203. NATS
204. NFLC
205. NFO Technical Committee
206. Nordic Airways
207. Norwegian Air Sports Federation
208. Norwegian Air Sports Federation, Gliding Section
209. Novair/Nordic Safety Analysis Group
210. OAA Oxford
211. Ornulf LIEN
212. Oxford Aviation Academy
213. P.Becker ACG
214. Pascal DREER
215. Pascal JOUBERT
216. Peter Kynsey
217. Ph.Walker
218. phil mathews
219. Philipp Peterhans
220. Pietro Barbagallo ENAC
221. President VNC
222. Quality Assurance, Denim Air
223. RAeS ICFO
224. RAF-AVIA Airlines
225. REGA

*List of commentators for Part-OR*

- 226. Rega / Swiss Air-Ambulance
- 227. Regierung von Oberbayern-Luftamt Südbayern
- 228. Reto Ruesch
- 229. Richard ALLEN
- 230. Robert McPhee
- 231. Rod Wood
- 232. Rory OCONOR
- 233. Royal Aeronautical Society
- 234. Royal Danish Aeroclub
- 235. Royal Swedish Aeroclub
- 236. Rui Sarmento
- 237. Ryanair
- 238. SAS
- 239. SAS Scandinavian Airlines
- 240. SATA Group
- 241. SCCA Scandinavian Cabin Crew Association
- 242. SCCA/ head of health and safety
- 243. Stefan Huber
- 244. STK
- 245. Susana Nogueira
- 246. Svenska Ballongfederationen
- 247. Swedish Transport Agency, Civil Aviation Department  
(Transportstyrelsen, Luftfartsavdelningen)
- 248. SWISS AERODROMES ASSOCIATION
- 249. Swiss International Airlines / Bruno Pfister
- 250. Swiss Power Flight Union
- 251. TAP Portugal
- 252. Thales Training & Simulation
- 253. The Lion Flying Group Ltd
- 254. TNT Airways
- 255. UK CAA
- 256. Unique (Zurich Airport)
- 257. Virgin Atlantic Airways
- 258. Walter Gessky
- 259. William JD TOLLETT