

Comment				Comment summary	Suggested resolution	From the commenter point of view a modification of the published text is*: -Not requested; -Recommended; -Requested	EASA comment disposition	EASA response
NR	Name of the organisation commenting	Section, table, figure	Page					
1	DGAC	General comment		The issue of patient isolation devices is not tackled in this special condition. The DGAC had discussions with EASA regarding such devices, and it was not clear if it should be considered as a loose item or if it had to be approved. In the latter case, compliance with CS §25.853(a) might be difficult to obtain and require a special condition.	Clarify whether or not patient isolation devices are subject to the CS 25 requirements, and especially CS §25.853(a).	Recommended	Noted	<p>Installation of patient isolation devices have been dealt on a case by case basis in the recent years when EASA advice was explicitly requested.</p> <p>Their use is not very frequent. The requirements for the device and the resultant design are wide-spread. The device is often brought on board as medical equipment together with the patient. For this reason it is not intended to cover this particular aspect of Medical Evacuation.</p> <p>It is to be reminded that EASA is concerned about the airworthiness aspect, concretely about the evacuation aspect.</p> <p>In contrast, EASA is not competent to address the infection risk.</p> <p>However, parts and material that are approved under a change to TC have to meet the applicable certification requirements including CS 25.853.</p> <p>The text of the proposed Special Condition has not been changed based on this comment.</p>
2	DGAC	Identification of issue  Special Condition a)	2  5	Regarding the evacuation procedures, the SC states that “authorization for transporting occupants in addition to those identified in the approved procedures for Medical Evacuation must be obtained by the NAA that is in charge to authorize the operation of the aircraft.” It is unclear on which basis the NAA should process and deliver such an authorization, as there is no concept of authorization in the frame of the MOPSC. Should it be processed as a derogation?	Indicate on which basis the NAA should process the requests for authorizations to transport occupants in addition to those identified in the approved procedures for Medical Evacuation, or remove this possibility.	Recommended	Noted	<p>The exact identical approach regarding ‘transportation of additional occupants’ was successfully applied during the period of exceptional ‘Cargo in Cabin’ operation.</p> <p>EASA can only determine the required occupants in relation to the approved design and the associated approved procedures. However, there may be additional operational requirements (e.g. crew rest time requirements) – implementation of which - are outside EASA’s remit.</p> <p>In absence of any such additional operational requirements, EASA would recommend to limit occupancy to the number established for certification.</p> <p>The text of the proposed Special Condition has not been changed based on this comment.</p>

\* Please complete this column using the drop-down list