European Union Aviation Safety Agency

Comment-Response Document 2020-10
Part 2 (Implementing rules & AMC/CS/GM)

RELATED NPA: 2020-10 — RMT.0591 — 31.8.2023

NOTE: PART 2 OF THIS CRD ADDRESSES THE COMMENTS SUBMITTED ON THE PROPOSED AMENDMENTS TO THE IMPLEMENTING RULES AND RELATED AMC/CS/GM INCLUDED IN NPA 2020-10.

Comment-Response Document 2020-10
Part 2 (Implementing rules & AMC/CS/GM)

Table of contents

Individual comments and responses

In responding to the comments, the following terminology has been applied to attest EASA's position:

(a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.

(b) **Partially accepted** — EASA either partially agrees with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.

(c) **Noted** — EASA acknowledges the comment, but no change to the existing text is considered to be necessary.

(d) **Not accepted** — The comment or proposed amendment is not agreed by EASA.

CRD table of comments, responses and resulting text

2.1 Why we need to change the rules

2.1 Why we need to change the rules	p. 4-6

comment	*216* comment by: *daa* Due to the impact of Covid 19 on the aviation industry, it is strongly recommended that any and all proposed changes are considered taking into account the impact they may have on financial resourcing and airports operating with reduced staffing numbers. It is suggested that the timelines of these proposals are altered to allow sufficient time for both operational and financial recovery and restructuring in order to ensure that airport operators are best placed to implement the changes when they enter into regulation.
response	Noted. The timelines are in accordance with ICAO, however this is an issue that it will be considered during the comitology process.

3.1. Draft regulation - Annex I

3.1. Draft regulation - Annex I	p. 10-11

comment	*52* comment by: *Aerodrome safety regulation departement* Definitions (5a), (5b), (36a), (36b) Some clarifications could be useful, for example in a GM, about the meaning and consequences of the mentionned applicability date. ICAO's initial intention was to use the transition period to progressively convert PCN into PCR in the AIP, as soon as regulations are available. That's why specific units with a factor (X100) had been choosen to avoid confusion between PCN and PCR

	publications in the Aeronatical Information on the same period of time. We would consider it useful for a better use of the transition period to mention explicitely that aerodromes, despite the defined applicability date, have the possibility to anticipate on publications in compliance with ACR-PCR method.
response	Noted.

comment	*106* comment by: *BMVI (LF 15)* (5a) 'aircraft classification number' (5b) 'aircraft classification rating' According to the currently published documents (Regulation and Easy Access Rules) we assume that both new terms should be inserted between number (6) 'aeronautical information service' and number (7) 'air navigation services'. Hence, the numbering should be (6a) and (6b) accordingly instead of (5a) and (5b), unless there is a change in above definitions that was not clearly apparent to us.
response	Noted. Final numbering will be fixed taking also into consideration Regulation (EU) 2020/2148.

comment	*108* comment by: *BMVI (LF 15)* (47) 'terms of the certificate' means the following […] - scope of aircraft operations exceeding the certified design characteristics of the aerodrome Due to the rewording of text and deletion of the phrase 'with higher aerodrome reference code letter', we suggest adding the following text to the definition in order to ensure the proper reference and prevention of misinterpretation: - scope of aircraft operations exceeding the certified design characteristics of the aerodrome according to ADR.OPS.B.090
response	Not accepted. Definition (47) of Annex I to Regulation (EU) No 139/2014 illustrates the meaning of the terms of the certificate by listing the items it covers. The requirements and the design specifications are included in the relevant Annex to Regulation (EU) No 139/2014 and CS-ADR-DSN.

comment	*161* comment by: *Riga International Airport* Change in definition (47) should be supplemented with a commentary or a guidance material that can be used to clearly infer if: a) OMGWS is one of such certified design characteristics, b) separate parts of aerodrome (i.e.different taxiways) may have different certified design characteristics, c) certified design characteristics may be specified in the certification basis of the aerodrome.

response | Not accepted.
Definition (47) of Annex I to Regulation (EU) No 139/2014 illustrates the meaning of the terms of the certificate by listing the items it covers. The requirements or the design specifications are included in the relevant Annex to Regulation (EU) No 139/2014 and CS-ADR-DSN.

comment | *228* comment by: *AIRBUS*

ANNEX I — DEFINITIONS FOR TERMS USED IN ANNEXES II TO IV of Regulation (EU) No 139/2014, Definition (36a)

Comment:

Definition (36a) is proposed to be updated as follows:

(36a) 'Pavement classification number (PCN)' means a number expressing the bearing strength of a pavement ~~*for unrestricted operations*~~. [Applicable until 27 November 2024]

Rationale:

To be in line with the updated definition provided in Annex 14 Amendment 15.

response | Not accepted.
The definition is in line with the corresponding one of ICAO Annex 14, Volume I.

Part-ADR.OR

3.1. Part-ADR.OR - ADR.OR.D.027 p. 11-12

comment | *3* comment by: *Stefan Stroeker*

Ladies and gentlemen,

regarding item (c)(1) I would recommend to specify the word 'regular' based on the meeting interval.
In my opinion there should be at least one meeting within 3-months interval.
Without further definition, 'regular' could be also interpreted as 'annual'.

With kind regards
Stefan Ströker

response | Partially accepted.

The frequency of the meetings is proposed to be established in accordance with the traffic density of the aerodrome.

comment | *4* comment by: *GdF*

	The aerodrome operator shall regularly review the effectiveness of its safety programmes. & (1) the local runway safety team and the other aerodrome safety committees meet at regular intervals; Both times "regular" is referenced, which is undefined. Please consider substituting by "at least once a year". require all relevant organisations operating or providing services Request to add "and PSOs", so that they are at least invited.
response	Accepted. The review of the effectiveness of its safety programmes is defined on an annual basis, and the frequency of the meetings of the safety committees is proposed to be established in accordance with the traffic density of the aerodrome.

comment	*12* comment by: *Belgian CAA* The BCAA supports this initiative
response	Noted. EASA would like to thank the Belgian CAA for the support.

comment	*21* comment by: *ACI Europe* **Proposed change/clarification with ref. to ADR.OR.D.027 (b) (2):** Requirement to invite all relevant organisations is difficult to acheieve at larger aerodromes. Guidance material is required regarding limitaions of "all relevant organisations" that need to participate in LRST. E.g. the five top operators, etc. **Proposed change/clarification with ref. to ADR.OR.D.027 (b) (2):** (b) As part of the safety programmes of point (a), the aerodrome operator ~~shall~~:…**shall ensure that** (2) ~~require~~ all relevant organisations (…) **are invited** to participate…. **Rationale:** In some MS (e.g. France), the ADR operator does not have the power to oblige other organisations to participate in LRST. **Proposed change:** Change ***ADR.OR.D.027 (c) (2)*** to: "(2) their proposals and actions are recorded and submitted as recommendations towards the management of respective organizations; and" **Rationale:** As LRST members are operational and safety experts and NOT statutory representatives of the organizations, LRSTs are not in a position to create action plans and ensure their implementation. As a result, LRSTs can only give recommendations to the management of involved organizations.
response	Noted.

	In regard to ADR.OR.D.027 point (b)(2), AMC1 ADR.OR.D.027(a);(b)(2) provides further clarifications. In accordance with Annex VII of Regulation (EU) 2018/1139, the aerodrome operator is responsible for the operation of the aerodrome, therefore is also responsible to establish, lead and implement the safety committees at the aerodrome. For this reason, the proposal that the aerodrome operator shall ensure that relevant organisations are invited to the safety committees is not accepted. In regard to point ADR.OR.D.027(c)(2), it is understood that proposals have the form of recommendations and needs to be followed up. This is also in line with ICAO Doc 9981.
comment	*43* comment by: *ACI Europe* **Proposed change to item (b)(2):** At large European Hub Airports it is not practicable to have 'all relevant organisations operating…at the aerodrome' participating in the local runway safety team. The number of aircraft operators, operating at such an aerodrome may exceed 100. The following amendment to the proposed text under (b)(2) is suggested: 'require the most relevant organisations operating or providing services at the aerodrome to participate in the local runway safety team…' 'most relevant' means: - aircraft operators that account for most of the daily movements at the aerodrome, - air navigation service provider(s) - other organisations undertaking activities in the movement area that may have impact on runway safety The term 'representatives' may already be the key to solving this issue. One representative may represent a number of organisations; these organisations could be all aircraft operators at a certain aerodrome. EASA is requested to acknowledge if the term 'representative' is meant accordingly.
response	Noted. In regard to ADR.OR.D.027 point (b)(2), AMC1 ADR.OR.D.027(a);(b)(2) provides further clarifications.
comment	*44* comment by: *ACI Europe* **Clarification for item (c)(1), (2) and (3):** For what specific reason should the invitation of the competent authority to meetings of the aerodrome safety committees be mandatory?

	The presence of the Competent Authority may have a negative effect on the openness and transparency that is needed to address safety issues in a safety committee. It is suggested to delete point (c)(3) because it may hamper the effectiveness of a safety committee.
response	Accepted. Point (c)(3) is deleted.

comment	*53* comment by: *Aerodrome safety regulation departement* 1- We consider the obligation for the aerodrome operator of inviting the authority to LRST and committees should be moderated and shouldn't be systematized. The inclusion of the authority to the LRST should be left to the aerodrome operator appreciation. Indeed, in some cases, the presence of the authority might be seen as part of oversight and be counterproductive. We propose to transfer provision c)3) into the AMC1 OR.D.027 (a)(b)2) and to modify the current wording as follows : "The aerodrome operator should consider inviting the competent authority at some LRST meetings if relevant." 2- In point e), we suggest to add parenthesis to the "s" of procedures as more than one procedure might not be needed: "The aerodrome operator shall establish and implement procedure(s) to ensure the implementation of points (a) to (d)."
response	Partially accepted. Point (c)(3) is deleted. EASA agrees that the regular participation of the Competent Authority might be counterproductive and be seen as part of the oversight. However, since the Competent Authority is responsible for the oversight of the aerodrome, it may decide on its own initiative to participate from time to time to ensure the correct application of the rule. For this reason, we will not update AMC1 ADR.OR.D.027(a);(b)(2) as proposed. In regard to point (e), the proposal is accepted.

comment	*101* comment by: *Avinor* ADR.OR.D027 Safety programmes and aerodomre safety committees (c) The aerodrome operator shall ensure that: (3) the competent authority is invited to such meetings. The competent authority should not be an active participant in these meetings.
response	Accepted. Point (c)(3) is deleted.

comment	*104* comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)* **ADR.OR.D.027 Safety programmes and aerodrome safety committees, (c)(3), page 11** The proposal to demand the aerodrome operator to invite the CAA to runway safety teams and other aerodrome safety committees meetings is not reasonable. The CAA will in most cases not be able to attend such meetings.
response	Accepted. Point (c)(3) is deleted.

comment	*136* comment by: *Civil Aviation Authority the Netherlands* Comment on ADR.OR.D.027 Safety programmes and aerodrome safety committees, (c)(3): For what specific reason should the invitation of the Competent Authority to meetings of the aerodrome safeyt committees be mandatory? The presence of the Competent Authority may have a negative effect on the openness and transparency that is needed to address safety issues in a safety committee. It is suggested to delete point (c)(3), because it may hamper the effectiveness of a safety committee.
response	Accepted. Point (c)(3) is deleted.

comment	*169* comment by: *Europe Air Sports* Comment: We support provisions for safety programmes and aerodrome safety committees. In this regard we encourage the invitation of Sports and recreational aviation stakeholders such as flying clubs (powered or gliding) and parachuting clubs to such committees. Rationale: Interdisciplinary cooperation increases mutual understanding of the different actors on the aerodrome area, e.g. when new infrastructures are required. We think, among other topics, of the supply of electric power or hydrogen for next generation(s) aircraft. RFFS in particular will be confronted with new situations requiring new equipment and additional training.
response	Noted.

comment	*188* comment by: *Romanian CAA*

	- There should be a clear connection between ADR.OR.D.027 and ADR.OR.D.005 Management system (at the moment that connection is missing) because ADR.OR.D.005 addresses the Management system and the proposed changes state that the safety programmes are „part of its management system". - It is stated that „the aerodrome operator shall regularly review the effectiveness" - the regularity should be established. - Regarding the nominated representatives of the relevant organisations operating or providing services at the aerodrome which should participate in the LRST, it should be established what „adequate and suitable operational expertise" means. In the scope of the LRST there should also be stated the need to monitor and evaluate the effectiveness of the mitigating measures established in prior LRSTs.
response	Noted The management system includes SMS as well. The safety committees are integral part of the SMS and more specifically to support risk assessments, safety communication and promotion, etc. Therefore, EASA considers that a link is not missing. EASA is proposing that the review of the safety programmes shall be conducted at least on an annual basis. Regarding the related expertise, please refer to the related AMCs as well as the subjects that these committees cover.

comment	*195* comment by: *Fraport AG* The IR didn't allow the option, that the LRST could be led from a thrid organisaton as ATC provider, when it is ensured/contracted that the items which has to be considdered by the aerodrome operator are implemented. **Proposed Change to (b)(1):** ... other aerodrome safety committees <u>or have a contracted partner in this position</u> **Rationale:** A third party could under idividual circumstances lead the LRST more neutral. **Proposed Change to (c)(3):** substitute actual text by <u>the competent Authority willbe in formed about the relevant topics</u> **Rationale:** The participation of the competent authority may have a negativ effect of the openess of discussion on probable identified safety issues.
response	Noted.

The aerodrome safety committees need to be led by the aerodrome operator and is not a matter of contractual obligations, therefore the proposal is not accepted.

Regarding point (c)(3), it is deleted.

comment

220 comment by: *Michael DE BRESSER*

ADR.OR.D.027 (c) (1): Add after "the local runway safety team and the other aerodrome safety committees meet at regular intervals" ", at least twice a year".

Reason "regular" is not specific enough. Our experience has shown that the runway safety team is a very efficient tool to improve safety by inter-disciplinary communication between the various organisations even at a smaller airport.

My proposal is to let the aerodrome operators organise such a meeting at least twice a year to improve the communication.

response

Partially accepted.

The frequency of the meetings is proposed to be established in accordance with the traffic density of the aerodrome.

comment

245 comment by: *SinaJobstHAM*

(b)(2)
The requirement to invite all relevant organizations is difficult to achieve at larger airports. The scope should be incresed here.

(c)(2)
Members of the aerodrome safety committees are operational representatives or from safety departments. They are generally not authorized to give instructions for their entire organization. So the safety committees only can give recommendations. Determination of specific action plans must take place in coordination with decision-makers, such as managing directors or the like.

response

Noted.

The rule refers to organisations which are relevant to the scope of each committee. Furthermore, the rule requires the participation of representatives. Further information is included in AMC1 ADR.OR.D.027(a);(b)(2).

The role of the safety committees is to prepare proposals which will be agreed by all involved organisations. It is expected that the representatives will be in a position to provide the views of their organisations.

comment

288 comment by: *Irish Aviation Authority*

*(b) … the aerodrome operator shall: (2) **require** all relevant organisations operating or providing services at the aerodrome to participate in the local runway safety team*

	and other aerodrome safety committees through their nominated representatives who possess adequate and suitable operational expertise, and current and direct involvement in runway operations. Suggest a change of the word: "require" in this instance. An Aerodrome Operator cannot compel an airline operator, based or otherwise, to attend meetings or dictate the representative that may be sent on behalf of a stakeholder. EASA should consider changing the word from "require" to "request".
response	Accepted.

comment	*289* comment by: *Irish Aviation Authority* *(e) The aerodrome operator shall establish and implement procedures to ensure the implementation of points (a) to (d).* Point (e) further reinforces the reference in (b)(2) above and forces the aerodrome operator to create and implement a procedure that may be instantly non-compliant and unenforceable.
response	Not accepted. Due to the change in (b)(2) and the replacement of the word 'require' with the word 'request', point (e) is enforceable.

comment	*299* comment by: *European Powered Flying Union* We support provisions for safety programmes and aerodrome safety committees. Rationale: Interdisciplinary cooperation increases mutual understanding of some times conflicting interests, e.g. when new infrastructures are required. We think, among other topics, of the supply of electric power or hydrogen for next generation(s) aircraft. RFFS in particular will be confronted with new situations requiring new equipment and additional training.
response	Noted.

Part-ADR.OPS

3.1. Part-ADR.OPS - ADR.OPS.A.005 p. 12

comment	*73* comment by: *Zurich Airport* Zurich Airport supports that the rules will become more detailled than today by implementing in the following AMC's.
response	Noted.

comment	*189* comment by: *Romanian CAA* - The proposed deletion will lead to AMC1 ADR.OPS.A.005 to also be deleted, AMC which contains valuble information regarding aerodrome operator responsibilities in regards to electronic terrain. - Also, the deletion of ADR.OPS.A.005 leads to a lack of responsibility regarding documentation and maintainance of aerodrome data.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.015 p. 12-13

comment	*5* comment by: *GdF* To ensure timely provision of the information to aeronautical information services, close coordination between the aerodrome operator and the relevant aeronautical information services is required. While this is technically true it does not specify who is responsible. Please consider substituting "is required" by "must be ensured by the aerodrome operator" or similar.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*22* comment by: *ACI Europe* The rationale behind the strict compliance to the AIRAC cycle is clear. However, operational requirements might lead to difficulties in certain cases. The requirement under point (c) should be amended as follows: "(c) ... The predetermined, internationally agreed AIRAC effective dates shall be observed by the aerodrome operator when submitting the raw information/data to the aeronautical information services provider***, unless an exemption is granted due to exceptional operational requirements in coordination with the AISP and the respective authority***." **Proposed Change for point (d):** The aerodrome operator shall provide raw aeronautical information/data, ***under its control,*** to the aeronautical information services provider, taking into account accuracy and integrity requirements that are necessary to meet the needs of the end-user of aeronautical data. **Rationale:** In some MS (e.g. France), the responsabilities for aeronautical data is shared between ANSP and ADR.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*160* comment by: *Riga International Airport* Change in (a)(2) requires a clarification if it is implied that infomation on status of services like customs, border control, ground handling and similar will not be reported when these services are deemed not to be under responsibility of the aerodrome operator.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*183* comment by: *EUROCONTROL* **ADR.OPS.A.015 Coordination between aerodrome operators and providers of aeronautical information service, Item (c)** Concerning the text "...changes to aeronautical information that affect charts and/or computer-based navigation systems...". A comprehensive list of subjects requiring to be notified under AIRAC is already defined thus using a few examples maybe misleading. Therefore, the examples should be removed from this provision since the link to AIS.TR.505 is already clearly defined.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*184* comment by: *EUROCONTROL* **ADR.OPS.A.015 Coordination between aerodrome operators and providers of aeronautical information service, Item (d)** The text quoting "...accuracy and integrity requirements..." should be reviewed/rationalised in the context of the latest and more complete ADR.OPS.A.010 "Data quality requirements" of Commission Implementing Regulation (EU) 2020/2148. Based on the latest rules, the AD needs to address more DQRs than just the two mentioned in the current proposed text.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*185* comment by: *EUROCONTROL* **ADR.OPS.A.015 Coordination between aerodrome operators and providers of aeronautical information service, Items (c) and (d)** There is a need to better clarify the term ‘raw (aeronautical) information/data’ either as a definition or as GM.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*190* comment by: *Romanian CAA* The word „providers" should be inserted after the text „close coordination between the aerodrome operator and the relevant aeronautical information services".
response	Noted. The comment will be considered in a future rulemaking task.

comment	*246* comment by: *SinaJobstHAM* (c) From an operational point of view, we consider the following addition to be useful: "The predetermined, internationally agreed AIRAC effective dates shall be observed by the aerodrome operator when submitting the raw information/data to the aeronautical information services provider, **unless an special permit is granted due to exceptional operational requirements in coordination with respective authority and AISP"**
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.075 p. 13

comment	*45* comment by: *ACI Europe* **Clarification:** Within the EU all elevations are reported and published in feet. Is there any specific reason why the required accuracy is given in meters? It is suggested is to specify the required accuracy in feet. One-half meter = 0.50 m = 1.5 ft One-quarter meter = 0.25m = 0.75ft
response	Noted. The comment will be considered in a future rulemaking task.

comment	*247* comment by: *SinaJobstHAM* Point (a) names aerodromes as responsible parties. For points b and c, the responsibilities should also be specified.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.080 p. 13

comment	*10* comment by: *CAA CZ*

	Please, we would propose to define the reference period and method of calculation.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*243* comment by: *Fraport AG* **Information:** In Germany the determination of the reference temperature is hoked at the german meteoroligal service. **Suggestion:** The aerodorme operator should only be responsible for the reporting.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*248* comment by: *SinaJobstHAM* In order to make the reference temperature comparable between the airports, we recommend adding a definition of the observation period.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.085 p. 14-15

comment	*23* comment by: *ACI Europe* **Clarification for item (a) (1) (iv) slope:** In the original GM1 ADR.OPS.A.005 Aerodrome data, the runway slope to be measured or described was specified as the ***longitudinal*** one. Clarification on what lies behind the deletion of this specification would be appreciated. If the intention to incorporate lateral slopes this should be added for clarification. Otherwise, „longitudinal“ should be added again. **Clarification for item (a) (7):** In the original GM1 ADR.OPS.A.005 Aerodrome data, runway-holding position and intermediate-holding position were used instead of the newly introduced term "***taxi-holding position***". This new wording is not used in ADR rules yet and hence it should be either defined or the original more specific wording should be used again. Alternatively, this term should be replaced by ***'intermediate holding positions'***. Is there any necessity to mention specifically the taxi-holding positions and stop bars, as they are already included in the marking and lighting of runways, taxiways and aprons within the same paragraph?
response	Noted.

	The comment will be considered in a future rulemaking task.

comment	*46* comment by: *ACI Europe* **Clarification on item (a)(10):** What is the added value of this information? Is it used for safety purposes, for aeroplane performance or situational awareness? There should be a pre-determined location in the AIP to publish this information. At this time, no such pre-determined location exists within the AIP. **Proposed change:** This requirement should therefore be harmonized with appendix 1 to Annex VI of part AIS of Regulation (EU) 2020/469.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*47* comment by: *ACI Europe* **Proposed change on item (c):** By making it mandatory for aerodrome operators to measure and report the coordinates of taxiway centre line points; there should be a pre-determined location in the AIP to publish this information. At this time, no such pre-determined location exists within the AIP. This requirement should therefore be harmonized with appendix 1 to Annex VI of part AIS of Regulation (EU) 2020/469. **Clarification on item (e):** The implementing rules ADR.OPS.A.0125 and ADR.OPS.A.135 referred to in point (e) of ADR.OPS.A.085 do not (yet) exist. Please provide further information on the correct reference.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*54* comment by: *Aerodrome safety regulation departement* 1- As regards (a)(8)), the CNS operator is already directly responsible for providing the Aeronautical information data related to frequency of VOR . As regards (a)10)), in many cases, the same entity is responsible for the coordinates of an ILS or G-BAS installation. We thus suggest to add a supplementary point f) to provide for these cases where the aerodrome operator has not the full control of these data, as follows : f) If agreed with the AIS, data described in a) could be provided by a third party. 2- We consider that point e) should be deleted as long as further updates regarding Aeronautical data haven't yet been fully completed. Indeed, point e) refers to ADR.OPS.A.125 and A.135 that have been delayed to a latter amendment of the Implementing Rules.
response	Noted.

	The comment will be considered in a future rulemaking task.

comment	*74* comment by: *Zurich Airport* (a)(1)(i): EASA should clarify if true or magnetic bearing is meant. In the current GM "true bearing" is specified. (a)(3) and (4): It is still unclear how aprons and taxiways with heterogen characteristics must be reported. From our point of view, this part needs clarification. (c) A definition of the appropriate taxiway centerline points should be added. (e) A figure of the area 2 & 3 or a reference should be added.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*109* comment by: *BMVI (LF 15)* Neither current regulation nor the NPA include the mentioned implementing rules in (e) (ADR.OPS.A.0125 and ADR.OPS.A.135).
response	Noted. The comment will be considered in a future rulemaking task.

comment	*150* comment by: *ACI Europe* **Clarification/amendment of item (a)(1)(i):** it should be clarified if ***true*** or ***magnetic*** bearing is meant. In the current GM "true bearing" is specified. **Clarification/amendment of item (a)(3) and (4):** It should be clarified if true or ***magnetic*** bearing is meant. In the current GM "true bearing" is specified. **Clarification of item (c):** A definition of the appropriate taxiway centerline points should be added. **Clarification of item (e):** A figure of the area 2 & 3 or a reference should be added for clarification.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*175* comment by: *EUROCONTROL*

	ADR.OPS.A.085 Aerodrome dimensions and related information, Item e) Item e) makes reference to ADR.OPS.A.0125 and ADR.OPS.A.135. It is not clear where these requirements are located, because this NPA (2020-10) does not go further than ADR.OPS.A.120. Last sentence of Item e) does not make sense if these requirements are not found.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*193* comment by: *FOCA Switzerland* Federal Office of Civil Aviation (FOCA; Swiss CAA): • For ADR.OPS.A.085 (a) (1) (iv): replace "slope" by "transverse and longitudinal slope" (Justification: Transverse and longitudinal slope shoudl be published in AIP); • For ADR.OPS.A.085 (a) (1) (vii): replace "for a precision approach runway category I, the existence of an obstacle-free zone when provided" by "for a precision approach runway, the existence of an obstacle-free zone (when provided for category I)" (Justification: With the current text, OFZ in case of Cat II and Cat III are not considered); • For ADR.OPS.A.085 (a) (10): replace "distances to the nearest metre of localizer and glide path elements comprising an instrument landing system (ILS) or azimuth and elevation antenna of a microwave landing system (MLS) or a ground-based augmentation system (GBAS) in relation to the associated runway extremities." by "distances to the nearest metre of localizer and glide path elements comprising an instrument landing system (ILS) or azimuth and elevation antenna of a microwave landing system (MLS) or a ground-based augmentation system (GBAS) in relation to the associated runway centre line." (Justification: It is unclear, what runway extremities should mean. It is therefore proposed to measure the distance in relation to the runway centre line).
response	Noted. The comment will be considered in a future rulemaking task.

comment	*198* comment by: *Fraport AG* **suggestion:** The bearing typ should be specfied for alle following paragraphs unter (a) **suggestion for (a)(7):** replace taxi-holding position by intermediate holding position **Rationale:** taxi holding-position ist not difined; intermediate holding position ist defined and used since decades.

response	Noted. The comment will be considered in a future rulemaking task.

comment	*249* comment by: *SinaJobstHAM* (a) (1) (iv) The wording was changed from “longitudinal slope” to “slope”. If the intention to incorporate lateral slopes this should be added for clarification. If not, please add “longitudinal” again. (a) (7) The term “taxi-holding position” is used the first time in the regulation. We would appreciate to use also still the common terms runway holding position and intermediate- holding position. Otherwise please add the term “taxi-holding position” in the definition part.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*300* comment by: *European Powered Flying Union* (4) Apron (i) and (ii): Question: Should the dimensions be tabled under these paragraphs? Rationale: These pieces of information, presented here, are vital for aircraft operators.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.090 p. 15-18

comment	*141* comment by: *Zurich Airport*
	
	The physical evaluation of the PCR of existing surfaces requires a significant effort. On surfaces which have no limitations on the operation of aircraft based on the existing ACN/PCN methodology, the application of the ACR/PCR methodology does not provide any added value. The evaluation puts an unnecessary financial burden on airport operators and is not legitimated from a cost-benefit perspective.
	Thus, we request that either
	
	• the proposed methodology of ARC/PCR becomes applicable only on surfaces
	  ○ that are constructed or refurbished after the date of implementation of the proposed methodology, or
	  ○ for which a higher classification is intended to allow the operation of aircraft types with a higher ACN/ACR, or

- EASA provides a mathematical method to calculate the PCR of existing surfaces based on the published PCN, without the need of physically evaluating the parameters required to determine the PCR.

Additionally, we are of the opinion that it cannot be the responsibility of the airport operator to specify the ACR's. Therefore, EASA should either require the aircraft manufacturers to provide the ACR of their respective aircraft types to the airport operators, or the ACR's should be published by EASA.

In order to allow a harmonized determination of the PCR we also request EASA to publish a practicable and approved calculation method for the PCR of new surfaces.

response

Noted.

The comment will be considered in a future rulemaking task.

comment

151 comment by: *ACI Europe*

Comment:
The physical evaluation of the PCR of existing surfaces requires a significant effort. On surfaces which have no limitations on the operation of aircraft based on the existing ACN/PCN methodology, the application of the ACR/PCR methodology does not provide any added value. The evaluation puts an unnecessary financial burden on airport operators and is not justified from a cost-benefit perspective.

Requested change options:

1. the proposed methodology of ARC/PCR becomes applicable only on surfaces that are constructed or refurbished after the date of implementation of the proposed methodology, ***or***
2. for which a higher classification is intended to allow the operation of aircraft types with a higher ACN/ACR, ***or***
3. the regulation provides a mathematical method to calculate the PCR of existing surfaces based on the published PCN, without the need of physically evaluating the parameters required to determine the PCR.

Additionally, we are of the opinion that it cannot be the responsibility of the airport operator to specify the ACR's. Therefore, the regulation should either require the aircraft manufacturers to provide the ACR of their respective aircraft types to the airport operators, ***or*** the ACR's should be published by the regulator.

In order to allow a harmonized determination of the PCR we also propose the publication of a practicable and approved calculation method for the PCR of new surfaces.

response

Noted.

The comment will be considered in a future rulemaking task.

comment	*199* comment by: *Fraport AG* **Suggestion for (c):** ... 2024 (if common ACR values are availabel for all A/C types provided by ICAO/EASA) **Rationale**: Actual no common ACR valuies are provided neitehr by AC manufacures nor by ICAO/EASA.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*230* comment by: *AIRBUS* ADR.OPS.A.090 Strength of pavements, paragraph (b)(3) Comment: ADR.OPS.A.090 (b)(3) is proposed to be updated as follows: (3) For the purpose of determining the ACN-*PCN*, the behaviour of a pavement shall be classified as equivalent to a rigid or flexible construction. **Rationale:** We understand that Annex 14 §2.6.4 is not included in Reg (EU) 139/2014 (and follow-up amendments) because it is applicable to the aircraft as giving the method to compute the ACN. Cross-reference to PCN in ADR.OPS.A.090 (b)(3) is then needed to be consistent with ADR.OPS.A.090 (b)(4) and related table (refer to NPA 2020-10 page 16):
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.095 p. 18-19

comment	*48* comment by: *ACI Europe* **Editorial comment on item (a):** In point (a) the words '…one or more-flight altimeter check location…' should be amended to read '…one or more **pre**-flight altimeter check location…' **Comment on item (b):** Hot spots published in the AIP should not be strictly considered as temporary measures only.
response	Noted.

	The comment will be considered in a future rulemaking task.

comment	*229* comment by: *AIRBUS* ADR.OPS.A.090 Strength of pavements, paragraph (c)(3) Comment: ADR.OPS.A.090 (c)(3) is proposed to be updated as follows: (3) For the purpose of determining the ACR-*PCR*, the behaviour of a pavement shall be classified as equivalent to a rigid or flexible construction. Rationale: We understand that §2.6.4 from Annex 14 is not included in Reg (EU) 139/2014 (and follow-up amendments) because it is applicable to the aircraft as it gives the method to compute the ACR. Cross-reference to PCR in ADR.OPS.A.090 (c)(3) is then needed to be consistent with ADR.OPS.A.090 (c)(4) & related table (refer to NPA 2020-10 page 17):
response	Noted. The comment will be considered in a future rulemaking task.

comment	*301* comment by: *European Powered Flying Union* We agree with this requirement. May we ask you include a more precise information here already, e.g. that the surface of the apron may normally be considered as such a location? Rationale: Such a provision covers most of the aerodromes, we think.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.100 p. 19-20

comment	*14* comment by: *Belgian CAA* It should be allowed to measure the declared distances for intersection take-off form a more conservative reference point, for example “from the intersection of the extended taxiway centre line and the runway centre line” or “from the point of contact of taxiway centre line marking and runway centre line”. These examples are common practice and by being more conservative, are at least equally safe. furthermore, the loss of runway length due to alignment of the aircraft prior to take-off should be taken into account by the operators for the calculation of the aircraft’s

	take-off mass (ICAO Annex 6, Part 1, paragraph 5.2.8). The IR should be supplemented with at least GM to promulgate that: If an intersection take-off will take place from an intersection with an intersection angle of 30° (rapid exit taxiway), and the taxiway centre line is followed until the runway centre line, there is a loss of line-up distance of at least 200 m.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*194* comment by: *FOCA Switzerland* Attachment #1 Federal Office of Civil Aviation (FOCA; Swiss CAA): • For ADR.OPS.A.100 (d): replace "The length of the runway shall be measured from the start of the runway pavement or where a transverse stripe marking is provided to indicate threshold displacement, at the inner edge of the transverse stripe across the runway" by "The length of the runway shall be measured from the start of the runway pavement or where a transverse stripe marking is provided to indicate threshold displacement, at the outer edge of the transverse stripe across the runway." (Justification: Markings are normally part of the runway (e.g. displaced thresholds and runway side stripe marking) and therefore to be included in the declared distances (see Figure L-3 of 139/2014 & Figure 5-4 (B) of ICAO Annex 14, Vol. I [Figure is attached]). Therefore, the expression “outer edge of the transverse stripe” should be used). • CS ADR-DSN.B.035 must be adapted accordingly.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*264* comment by: *AESA Spain* Question may be raised on where does the runway pavement start when TWY and RWY are one after the other. Please consider moving the content of GM2 ADR.OPS.A.005(a) to a GM/AMC for this ADR so this clarification would not only be "For surveying purposes…"
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.105	p. 21

comment	*6* comment by: *GdF*

	The aerodrome operator shall monitor the condition of the movement area and the operational status of related facilities, and shall report on matters... Report to whom? If the report has to be made to the AIS as referenced in a), then please consider adding it in b) to ensure this.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*79* comment by: *Zurich Airport* Supported (from co-ordination of MAINT point of view)
response	Noted. The comment will be considered in a future rulemaking task.

comment	*110* comment by: *BMVI (LF 15)* ADR.OPS.A.105 (b) Compared to the former version (GM) and compared to Annex 14, aspects according to winter and bad weather were deleted (i.e. water, snow, slush, ice or frost on a RWY, TWY or an apron; anti-icing or de-icing chemicals or other contaminants on a RWY, TWY or apron; snow banks or drifts adjacent to a RWY, TWY or apron). Unfortunately, there was no explanation associated with that change. Since the condition of the movement area is of utterly importance to aviation safety, there should be at least a cross reference to the document or rules that include those measures. Annex 14 still contains the complete list.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.110 p. 21

comment	*24* comment by: *ACI Europe* **<u>Proposed change or deletion of ADR.OPS.A.115:</u>** This IR is easily confused with ADR.OPS.B.011 Removal of disabled aircraft. We propose to either ***change to "Information on disabled aircraft removal"***, in congruence with ADR.OPS.A.115 Information on rescue and firefighting services ***or*** deletion of all OPS.A.110 **<u>Rationale:</u>** Requirements for this IR are already included in ADR.OPS.B.011 Removal of disabled aircraft (b). If the IR is retained a definition of "aircraft disabled" should be added for clarity.
response	Noted.

	The comment will be considered in a future rulemaking task.

comment	*163* comment by: *Riga International Airport* The particular wording proposed in paragraph (b) which does not include "on request" as in paragraph (a) or "to the aeronautical information services" like in ADR.OPS.A.115 (a) may imply that such information shall be continuously maintained available via unspecified means that are supplemental to the means already specified in the AMC3 ADR.OR.E.005 D6.11 (i.e. the aerodrome manual and the AIS). The requirement must be clarified so that aerodrome operator is not expected to demonstrate evidence of the respective information being posted to all aircraft operators that have stated their intent to use the aerodrome.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.115 p. 21

comment	*111* comment by: *BMVI (LF 15)* ADR.OPS.A.115 (b) In order to prevent misinterpretation concerning the information and data to provide, we suggest the following adaptation of the text (see also ICAO Annex 14 - 2.11.2): “The level of protection normally available at the aerodrome shall be expressed in terms of the category of the rescue and firefighting services as described in ADR.OPS.B.010 and in accordance with the types and amounts of extinguishing agents normally available at the aerodrome.”
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.A.120 p. 22-23

comment	*112* comment by: *BMVI (LF 15)* The aerodrome operator shall make available to the aeronautical information services the following information concerning a visual approach slope indicator system installation […] We suggest adding the relevant text in Figure M-5 (CS ADR-DSN.M.650) for a 3° PAPI as well. Maybe it would be even easier to insert an according cross reference. The mistaken use of the incomplete diagram could thereby be prevented.
response	Noted.

	The comment will be considered in a future rulemaking task.

comment	*187* comment by: *EUROCONTROL*
	ADR.OPS.A.70 to ADR.OPS.A.120, page 22 grouped rationale, first para: The rationale should take into account that the ADR regulation has been amended meantime and the quoted "lacking requirements" are now forming part of CIR 2020/2148. In particular, the Aeronautical data catalogue therefore became a key concept for ADR concerning data quality requirements, as defined in ADR.OPS.A.030 of CIR 2020/2148 amending 139/2014.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*265* comment by: *AESA Spain*
	regarding point (e) We would like to ask for some clarification on where does this requirement came from and how it is interacting with CS.M.650
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.B.001 p. 23

comment	*155* comment by: *Europe Air Sports*
	Page 23 Second paragraph of the “Rationale” text started on page 22: “By doing so, the reported PCR will address, in a very accurate manner, the amount of damage that each aircraft produces…”: Comment : “damage” is not correct, “stress” is better; damage renders the infrastructure unserviceable immediately, stress in the long run only. We presume the latter is meant.
response	Noted. The comment will be considered in a future rulemaking task.

3.1. Part-ADR.OPS - ADR.OPS.B.011 p. 23-24

comment	*71* comment by: *Aerodrome safety regulation departement*

	In current R UE 139/2014, provision 9.3 of Annex 14 vol I is transposed in GM5 ADR.OPS.B.005(a). Since this provision is now transposed in new ADR.OPS.B.011, we consider GM5 ADR.OPS.B.005(a) should be deleted for better consistancy.
response	Accepted. GM5 ADR.OPS.B.005(a) is removed.

3.1. Part-ADR.OPS - ADR.OPS.B.070 p. 24-25

comment	*80* comment by: *Zurich Airport* Supported.
response	Noted. EASA would like to thank Zurich airport for the support.

comment	*191* comment by: *Romanian CAA* The process for managing the aerodrome operational safety during works should make use of the change management process of the SMS.
response	Noted.

comment	*266* comment by: *AESA Spain* regarding point (d) According to the draft, reduced runway length operations are addressed in ADR.OPS.B.100. Please Consider erasing duplicated requirements or including a reference to ADR.OPS.B.100.
response	Not accepted. ADR.OPS.B.100 refers to suspension or closure of runway operations and not to operations with reduced declared distances.

3.1. Part-ADR.OPS - ADR.OPS.B.090 p. 25-26

comment	*15* comment by: *Belgian CAA* The BCAA supports the introduction of these revised requirement, however, item (b) does not meet the intended objective. Item (b) only requires to "assess the impact of the…" where it is more appropriate to require "a assessment of the compatibility between the operation of the aeroplane and aerodrome infrastructure and operations, and to develop appropriate measures in order to maintain an acceptable level of safety during operations" as required by ICAO An14 standard 1.7.1 and Doc 9981.
response	Not accepted.

	Point (b) requires the aerodrome operator to perform an impact assessment of the aircraft characteristics specified in point (c) on the aerodrome infrastructure, its facilities, equipment, and operation, and vice versa. The 'measures' are part of the ADR.OR.B.040 process.
comment	*81* comment by: *Zurich Airport* Supported.
response	Noted. EASA would like to thank Zurich Airport for the support.
comment	*231* comment by: *AIRBUS* ADR.OPS.B.090 Use of the aerodrome by aircraft exceeding the certified design characteristics of the aerodrome, paragraph (c)(7) **Comment:** The "Nose characteristics" quoted in paragraph (c)(7) of ADR.OPS.B.090 should be more explicit. Rationale: Several parameters are related to "nose characteristics". They should be explicitly identified.
response	Noted. Paragraph (a)(7) of AMC1 ADR.OPS.B.090 further details the impact of the nose characteristics.
comment	*274* comment by: *AESA Spain* it would be advisable to incorporate in ADR.OPS.B.090, in the list of aircraft characteristics to be assessed, some missing items that appear in ICAO Circular 305 Chapter 2. In particular, "Technology evolution" which may impact in: a) runway and shoulder width; b) taxiway and shoulder width; c) aircraft certification criteria; d) the OFZ and balked landing surface; e) the in-flight phase; and f) environmental aspects. If there is a particular point in not including thos points we would like to ask for clarification on the rationale to exclude them
response	Not accepted.

	Paragraph (c) of ADR.OPS.B.090 contains the list of aircraft characteristics that have to be assessed for the impact on the aerodrome infrastructure, its facilities, equipment, and operation, and vice versa. The list of aircraft characteristics that need to be assessed is in line with the corresponding one provided in ICAO PANS-Aerodromes.

3.1. Part-ADR.OPS - ADR.OPS.B.095 p. 26-27

comment	*13* comment by: *Belgian CAA* The BCAA supports this initiative
response	Noted. EASA would like to thank the Belgian CAA for the support.

comment	*76* comment by: *Zurich Airport* Hot spots published in the AIP should not be strictly considered as temporary measures only.
response	Noted.

3.1. Part-ADR.OPS - ADR.OPS.B.100 p. 27

comment	*82* comment by: *Zurich Airport* Supported.
response	Noted. EASA would like to thank Zurich airport for the support.

comment	*149* comment by: *A4E* Add to paragraph (a) (5) the TODA for intersection take off as per (c)(6) Comment: This information could be presented in the already existing AIP table, which lists the declared distances.
response	Noted. The rule refers to the suspension of operations or closure of runway, which in this case information of TODA for intersection take-off is not applicable.

CS-ADR-DSN

3.2. CS-ADR-DSN - CS ADR-DSN.R.855	p. 59

comment	*59* comment by: *Aerodrome safety regulation departement* The transfert of § a), b), d) and e) of CS ADR.DSN.R.855 to AMC1 ADR.OPS.B.070(c)(5) leads to a change in the scope of application of closed runways and taxiways marking. Indeed, provisions OPS.B.070 are dedicated to the regulatory framework related to aerodrome works whereas marking described in CS ADR.DSN.855 might also concern infrastructures permanently closed for other operationnal reasons than works. For example, such markings might be use on (or part of) infrastructures that are not maintened nor used any more and yet still visible for the pilots. Since the CS ADR.DSN.R.855 is referred to in AMC1 ADR.OPS.B.070(c)(5), we propose to give up this transfer to maintain the full scope of applicability of the CS.
response	Partially accepted. Indeed, the closure of runways, taxiways or parts thereof may not be due to airside works. For this reason, and in order to address all the cases a new implementing rule ADR.OPS.B.071 is proposed.

comment	*83* comment by: *Zurich Airport* Supported.
response	Noted.

comment	*118* comment by: *BMVI (LF 15)* We would appreciate and be thankful, if a cross reference to ADR.OPS.B.070 or AMC1 ADR.OPS.B.070(c)(5) could be added in order to prevent overlooking important aspects on that really important matter (could also be in GM).
response	Noted. A new implementing rule ADR.OPS.B.071 is proposed, in order to address the issue.

3.2. CS-ADR-DSN - CS ADR-DSN.R.870	p. 60

comment	*29* comment by: *ACI Europe* **<u>Editorial comment on items (a) and (b):</u>** Points (a) and (b) are deleted in the proposed text. The former point (c) will be maintained and is redesignated as point (a). The proposed text however only contains one point so the designation '(a)' can be deleted.

	Proposed change: Change heading so it corresponds more accurately to the content and/or modify introduction of the text in order to add context. **Rationale:** Heading ("Unserviceable areas") no longer corresponds to the text which in its remaining version refers only to characteristics of unserviceability markers and lights.
response	Accepted. 'Marking and lighting of unserviceable areas'.

comment	*60* comment by: *Aerodrome safety regulation departement* As well as CS ADR.DSN.R.855, the transfert of § a), b) of CS ADR.DSN.R.870 to AMC1 ADR.OPS.B.070(c)(5) leads to a change in the scope of application of unserviceable areas. Indeed, provisions OPS.B.070 are dedicated to the regulatory framework related to aerodrome works whereas marking described in CS ADR.DSN.870 might also be used on infrastructures unserviceable for other operationnal reasons than works. Since the CS ADR.DSN.R.855 is referred to in AMC1 ADR.OPS.B.070(c)(5), we propose to give up this transfer to maintain the full scope of applicability of the CS.
response	Partially accepted. The tile of the CS is proposed to be changed and a new implementing rule ADR.OPS.B.071 is proposed to address cases which are not related to airside works only.

comment	*84* comment by: *Zurich Airport* Supported.
response	Noted.

comment	*119* comment by: *BMVI (LF 15)* We would appreciate and be thankful, if a cross reference to ADR.OPS.B.070 or AMC1 ADR.OPS.B.070(c)(5) could be added in order to prevent overlooking important aspects on that really important matter (could also be in GM).
response	Noted. A new implementing rule ADR.OPS.B.071 is proposed, in order to address the issue.

3.2. CS-ADR-DSN - GM1 ADR-DSN.R.870 p. 60-61

comment	*30* comment by: *ACI Europe*

	Proposed change: Change heading so it correspond more accurately to the content and/or modify introduction of the text in order to add context. **Rationale:** Heading ("Unserviceable areas") no longer corresponds to the text which in its remaining version refers only to characteristics of unserviceability markers and lights. **Clarification:** What is the intention of / change in meaning by replacing "should be" with "are" and "is"?
response	Accepted. 'Marking and lighting of unserviceable areas'.

comment	*61* comment by: *Aerodrome safety regulation departement* Same comment as for the related CS
response	Partially accepted. The tile of the CS is proposed to be changed and a new implementing rule ADR.OPS.B.071 is proposed to address cases which are not related to airside works only.

comment	*85* comment by: *Zurich Airport* Supported.
response	Noted.

AMC/GM to Part-ADR.AR

3.3. AMC/GM to Part-ADR.AR - GM1 ADR.AR.C.035(e) p. 63-64

comment	*120* comment by: *BMVI (LF 15)* Table and Footnote: 'Scope of aircraft operations exceeding the certified design characteristics of the aerodrome' Due to the rewording of text and deletion of the phrase 'with a higher aerodrome reference code letter', we suggest adding the following text to the definition in order to ensure the proper reference and prevention of misinterpretation: Scope of aircraft operation exceeding the certified design characteristics of the aerodrome according to ADR.OPS.B.090
response	Accepted. Footnote 7 of GM1 ADR.AR.C.035(e) is amended accordingly.

AMC/GM to Part-ADR.OR

3.3. AMC/GM to Part-ADR.OR - GM1 ADR.OR.B.040(a);(b) p. 64

comment	*86* comment by: *Zurich Airport* Supported.
response	Noted. EASA would like to thank Zurich airport for the support.

3.3. AMC/GM to Part-ADR.OR - AMC1 ADR.OR.D.027(a);(b)(2) p. 65

comment	*31* comment by: *ACI Europe* **Proposed change:** By transferring this from GM to AMC status, wildlife management is mandated to participate in the Manoeuvring area/Apron Safety Committee but not necessarily in the Local Runway Safety Committee, even though wildlife events are typically associated with runway safety. Consider reverting back to GM.
response	Partially accepted. EASA agrees that wildlife management is also relevant to runway safety, therefore their participation in the LRST has been added. Furthermore, EASA is in the opinion that certain activities at the apron may increase the risk of wildlife strikes, therefore they are also included in the manoeuvring area/apron safety committees.

comment	*121* comment by: *BMVI (LF 15)* (f) The numbers of total drivers having access to the manoeuvring area could be relatively high (i.e. rescue- and firefighting personnel, runway checkers, maintenance personnel etc.). Inviting all drivers to the local runway safety team could lead to a high number of people and therefore reducing the efficiency of the team to solve problems by generating no significant safety benefit (all drivers can contribute to only one aspect + normally use the safety reporting system when witnessing potential hazards). Additionally incidents and accidents are documented and discussed in the runway safety team. We ask therefore to delete this passage, especially since it is also not found in ICAO Runway Safety Team Handbook, Annex 19 or PANS-ADR. Due to the increase of meaning of this requirement from GM to AMC, it should be discussed how the list of participants could be adapted in that case while at the same time generating the same safety outcome (i.e. inviting someone from the department that is responsible for driver training).
response	Accepted.

comment	*122* comment by: *BMVI (LF 15)* As the AD wildlife management staff is often operating near or on the RWY and because wildlife management is much more related to ACFT movements on and near the RWY we suggest to include it as letter "(d) aerodrome wildlife management;" and omit in AMC2 ADR.OR.D.027(a);(b)(2).
response	Partially accepted. EASA agrees that wildlife management is also relevant to runway safety, therefore their participation in the LRST has been added. Furthermore, EASA is in the opinion that certain activities at the apron may increase the risk of wildlife strikes, therefore they are also included in the manoeuvring area/apron safety committees.

comment	*252* comment by: *SinaJobstHAM* We would welcome leaving this paragraph as GM, as this would give more flexibility in the composition of the committees.
response	Not accepted. The AMC lists the organisations which, in the opinion of the Agency are necessary to participate in the LRST. Keeping the list in GM does not ensure their participation, which is ensured to a large extend through the AMC Furthermore, the proposed composition is in accordance with ICAO Doc 9981 'PANS-Aerodromes'.

comment	*296* comment by: *Irish Aviation Authority* *EASA Rationale: The Local Runway Safety Team (LRST) is important to support the aerodrome operator to enhance runway safety. Currently, the composition of the LRST is only a GM, therefore the participation of some key organisations is not ensured. For this reason, the content of GM2 ADR.OR.D.027 with regard to the composition of the LRST is transferred to an AMC.* As per earlier comments, an Aerodrome Operator cannot compel an airline operator, based or otherwise, to attend meetings or dictate the representative that may be sent on behalf of a stakeholder.
response	Not accepted. The AMC should be written in conjunction with the implementing rule. Point (b)(2) in the rule states that the aerodrome operator shall request the participation of different organisations and the AMC specifies which organisations should be invited. The decision whether or not to participate is on the individual organisation.

3.3. AMC/GM to Part-ADR.OR - AMC2 ADR.OR.D.027(a);(b)(2) p. 66

comment	*51* comment by: *ACI Europe*

	Editorial comment: (a) The aerodrome operator should establish (a) Manoeuvring area/Apron Safety Committee***(s)***; **Rationale:** Depending on the airport and its size/layout, there can be one ore more Apron Safety Committees. **Proposed clarification to item (b):** The participant of the LRST should be able to represent more than one entity. E.g. one representative could cover various airlines.
response	Accepted. The AMC does not specify the number of committees that needs to be established. Text is revised to provide more clarity. In regard to the representation of the aircraft operators, for practical reasons, this is accepted and text is revised accordingly.

comment	*77* comment by: *Zurich Airport* EASA could specify that a participant of the Local Runway Safety Team should be able to represent more than one entity (i.e. one representative for various airlines).
response	Accepted. The text is revised accordingly.

comment	*123* comment by: *BMVI (LF 15)* (b) (1) The numbers of aerodrome users active in flight operations could be relatively high. Inviting all those persons to aerodrome safety committees could lead to a high number of people and therefore reducing the efficiency of the committees to solve problems by generating no significant safety benefit (see also comment to AMC1 ADR.OR.D.027(a);(b)(2)). We ask therefore to adapt this passage, especially since it is also not found in ICAO Runway Safety Team Handbook, Annex 19 or PANS-ADR. Due to the increase of meaning of this requirement from GM to AMC, it should be discussed how the list of participants could be adapted in that case while at the same time generating the same safety outcome (i.e. inviting members or representatives of the local Airline Operations Committee).
response	Accepted. The text is revised accordingly.

comment	*124* comment by: *BMVI (LF 15)* We suggest to delete (b)(5) in this context, see Comment No. 122.

response	Not accepted. Many wildlife management issues are stemming from apron activities, therefore they presence is necessary.

comment	*297* comment by: *Irish Aviation Authority* *The aerodrome operator should establish (a) Manoeuvring area/Apron Safety Committees;* The requirement for the establishment of Manoeuvring area/apron safety committee should be commensurate to the scale of operations at the aerodrome. For some aerodromes, the LRST may be the appropriate forum to cover all movement area safety issues under its' Terms of Reference.
response	Noted. The objective of the EASA proposal is to ensure that runway, manoeuvring area and apron safety issues are discussed with all the involved stakeholders. The proposed AMC does not limit aerodrome operators to structure the number of the committees taking into consideration the size and the complexity of the aerodrome.

3.3. AMC/GM to Part-ADR.OR - AMC1 ADR.OR.D.027(d)(1);(d)(2) p. 66-67

comment	*125* comment by: *BMVI (LF 15)* (d)(2) Members of the runway safety team already include pilots that usually fly in and out the concert airport and therefore they possess the relevant knowledge. Additionally there are standard maintenance procedures and checks on the side of airport personnel. The newly added text passage implies that the team should asses the light conditions in adverse weather conditions or during night which is (knowing the background of the members of the runway safety team) very hard to implement/monitor. The text should therefore be reworded or moved to guidance material. ICAO Runway Safety Team Handbook has only a note on that matter. Transferring a note in an ICAO Manual to AMC level should be reconsidered. See ICAO Handbook: *Note.— A tour of the airport during different times of the day and varying environmental conditions should be considered to allow identification of hazards specific to certain light and adverse weather conditions.*
response	Not accepted. Point (d)(2) refers to the assessment of the adequacy of the visual aids in different light conditions, not the performance of the individual lights.

3.3. AMC/GM to Part-ADR.OR - AMC3 ADR.OR.E.005 p. 74-75

comment	*126* comment by: *BMVI (LF 15)* AMC3 ADR.OR.E.005 (a) Due to the rewording of text and deletion of the phrase 'with higher code letter at the aerodrome', we suggest adding the following text in order to ensure the proper reference and prevention of misinterpretation: Procedures for the operation of aircraft that exceed the certified design characteristics of that aerodrome according to ADR.OPS.B.090
response	Accepted. Point (a)(28) of AMC3 ADR.OR.E.005 is amended accordingly.

AMC/GM to Part-ADR.OPS

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.A.005 p. 75

comment	*178* comment by: *EUROCONTROL* **AMC1 ADR.OPS.A.005 Aerodrome data, Item (b)** Only the requirements for obstacles were transferred from this item in new ADR.OPS.A.085 Item (e). The requirements for provision of terrain data for Area 2 and Area 3 of aerodromes were not transposed from AMC lacking any rationale.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*179* comment by: *EUROCONTROL* **AMC1 ADR.OPS.A.005 Aerodrome data, Item (c)** This item was not included in new ADR.OPS.A.085 and was not transposed from AMC lacking any rationale. ICAO Annex 15 5.3.3.4.4 is explicit in provision of this data for Area 2.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*180* comment by: *EUROCONTROL* **AMC1 ADR.OPS.A.005 Aerodrome data, Item (d)** This item was not included in new ADR.OPS.A and was not transposed from AMC lacking any rationale. ICAO Annex 15 5.3.3.3.3 and 5.3.3.4.5 is explicit in provision of this data.

response	Noted. The comment will be considered in a future rulemaking task.

comment	*181* comment by: *EUROCONTROL* **AMC1 ADR.OPS.A.005 Aerodrome data, Item (e)** This item was not included in new ADR.OPS.A and was not transposed from AMC lacking any rationale. ICAO Annex 15 5.3.3.3.8 and 5.3.3.4.10 is explicit in provision of this data.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*182* comment by: *EUROCONTROL* **AMC1 ADR.OPS.A.005 Aerodrome data, Item (f)** This item was not included in new ADR.OPS.A and was not transposed from AMC lacking any rationale. EASA's "European Plan for Aviation Safety 2021-2025" recognises collision with obstacles and terrain as top-10 key risks. With this risk in mind, it is not clear the reason for deletion of this AMC that should establish the responsibility for origination of terrain and obstacle data outside the aerodrome boundary.
response	Noted. The comment will be considered in a future rulemaking task.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.A.080 p. 85

comment	*32* comment by: *ACI Europe* In the original GM1 ADR.OPS.A.005 Aerodrome data, the timespan for averaging the mean temperature was defined as 5 years. Suggest to specify a timespan again.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*305* comment by: *European Powered Flying Union* Question: Why not directly fix "5 years" as reference period? Rationale: By doing so all parties concerned have to follow the same rule.
response	Noted. The comment will be considered in a future rulemaking task.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.090(b)(1)(i);(b)(2) p. 85

comment	*201* comment by: *FOCA Switzerland* Federal Office of Civil Aviation (FOCA; Swiss CAA): • on GM1 ADR.OPS.A.0.90 (b)(1)(i)(b)(2): add "(c) Different PCNs may be reported if the strength of the pavement differs significantly between different parts of the movement area." (justification: Not all parts of the movement area are dimensioned in the same way and are not subject to the same solicitations. It should be specified that it is possible to have different PCNs depending on which part of the movement area is considered.) • Same comment for PCR (GM1 ADR.OPS.A.090(c)(2)).
response	Noted. The comment will be considered in a future rulemaking task.

comment	*223* comment by: *Fraport AG* **Clarification needed (a):** From 2024 ACN/PCN is replaced by ACR/PCR. In this GM the publication is only specified to PCN. Does this mean that in the future PCR has to be published in any case with the exact value of one-hundert or one-thousand or only even? - compare GM1 ADR.OPS.A.090 (c)(2)
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.090(b)(4) p. 85

comment	*62* comment by: *Aerodrome safety regulation departement* The module of elasticity E is used in ACR-PCR method only. This provision should then be transferred to a GM1 ADR.OPS.A.090 (c)(4)
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

comment	*235* comment by: *AIRBUS* GM1 ADR.OPS.A.090(b)(4) Strength of pavements **Comment:** Airbus suggests to move the considerations related to "Modulus of Elasticity" from GM1 ADR.OPS.A.090(b)(4) Strength of pavements to GM1 ADR.OPS.A.090(c)(4) Strength of pavements (refer to page 86). Rationale: ADR.OPS.A.090(b)(4) Strength of pavements addresses ACN/PCN reporting system. Considerations related to Modulus of Elasticity recalled below (refer to page 85) "MODULUS OF ELASTICITY By adopting the layered elastic analysis (LEA) within the pavement rating system, the subgrade strength categories are designated with the modulus of elasticity (E modulus)." adresses ACR/PCR reporting system and should be part of GM1 ADR.OPS.A.090(c)(4) instead of GM1 ADR.OPS.A.090(b)(4).
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.090(b) p. 85-86

comment	*63* comment by: *Aerodrome safety regulation departement* Example 1 of the GM is not consistent with provision 2.6.6 of Annex 14 vol I applicable until 27th 2024. It seems there has been a wrong copy-paste between example 1 and 2. To be fully consistent with ICAO provisions applicable until 27th nov 2024, Example 1 should be modified has follows : *"If the bearing strength of a rigid pavement, resting on a medium-strength subgrade, has been assessed by technical evaluation to be PCN 80 and there is no tire pressure limitation, then the reported information would be:.."*
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

comment	*102* comment by: *Avinor*

	GM1 ADR.OPS.A.090(b) Strength of pavements Example 1 If the bearing strength of a composite pavement, behaving like a flexible pavement and resting on a high strength subgrade, has been assessed by using aircraft experience to be PCN 50 and the maximum tyre pressure allowable is 1.25 MPa, then the reported information would be: PCN 80 / R / B / W / T Example 1 If the bearing strength of a composite pavement, behaving like a rigid pavement and resting on a medium strength subgrade, has been assessed by using tecnical evaluation to be PCN 80 and the maximum tyre pressure allowable is unrestricted, then the reported information would be: PCN 80 / R / B / W / T
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

comment	*127* comment by: *BMVI (LF 15)* The text in example 1 should be adapted as follows according to ICAO Annex 14: “If the bearing strength of a rigid pavement, resting on a medium-strength subgrade, has been assessed by technical evaluation to be PCN 80 and there is no tire pressure limitation, then the reported information would be: PCN 80 / R / B / W / T” Additionally we would appreciate if the examples for the ACR / PCR method would be integrated in the according guidance material as well.
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

comment	*224* comment by: *Fraport AG* **Clarification necessary:** my Examples available fro PCR method in the future?
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task.

Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.090(c)(2) p. 86

comment *202* comment by: *FOCA Switzerland*

Federal Office of Civil Aviation (FOCA; Swiss CAA):

- on GM1 ADR.OPS.A.090 (c)(2): replace "Different PCRs may be reported if the strength of the pavement is subject to significant seasonal variation" by
  - "(a) Different PCRs may be reported if the strength of the pavement is subject to significant seasonal variation.
  - (b) Different PCNs may be reported if the strength of the pavement differs significantly between different parts of the movement area."

(Justification: see comment number 201)

response Noted.

Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task.
Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.090(c)(4) p. 86

comment *64* comment by: *Aerodrome safety regulation departement*

This GM refers to a note mentionned in example 2 of GM1 ADR.OPS.A.090 (c).

Yet, the referred GM1 ADR.OPS.A.090 c) is missing. The list of ACR-PCR publications examples stemming from 2.6.6 Strength of pavements applicable as of 28 November 2024 (as an equivalent of GM1 ADR.OPS.A.090 b) for the ACN-PCN method) has indeed not been transposed.

response Noted.

Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task.
Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

comment *225* comment by: *Fraport AG*

Clarification needed:

	The refered GM1 ADR.OPS.A.090(c) ist not available in NPA 2020-10
response	Noted. Proposed point ADR.OPS.A.090 and its corresponding AMC/GM will be considered in a future rulemaking task. Current GM1 ADR.OPS.A.005 Aerodrome data is updated to incorporate the new methodology on ACR-PCR.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.A.095(a) p. 87

comment	*75* comment by: *Zurich Airport* EASA should take into account that altimeter check locations could be located on other surfaces than apron.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*157* comment by: *ACI Europe* **Comment:** It should be taken into account that te altimeter check location could be locsated on a surface other than the apron.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*227* comment by: *Fraport AG* **Suggestion:** A pre-flight altimeter check location should be located on the manoeuvering area preferably on an apron. **Rationale:** A pre-flight altimeter check location could also be located on a taxiway or on the threshold if the traffic situation eould allow this psoition.
response	Noted. The comment will be considered in a future rulemaking task.

comment	*306* comment by: *European Powered Flying Union* Remark: I do not know an aerodrome where an aircraft has make a full-stop for an altimeter check after leaving the apron. Such a situation should not exist, it is costly, blocks the traffic, and is not environmentally friendly.

response	Noted. The comment will be considered in a future rulemaking task.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.095(a) p. 87

comment	*307* comment by: *European Powered Flying Union* Remark: I do not know an aerodrome where an aircraft has make a full-stop for an altimeter check after leaving the apron. Such a situation should not exist, it is costly, blocks the traffic, and is not environmentally friendly.
response	Noted. The comment will be considered in a future rulemaking task.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.110 p. 87

comment	*162* comment by: *Riga International Airport* The wording suggsted for GM1 ADR.OPS.A.110 ("may be expressed in terms of the largest type of aircraft which the aerodrome is equipped to remove") may prove contradictory to AMC3 ADR.OR.E.005 D6.11 where a corresponding requirement neither includes a provision for optionality nor delimits this capability to equipment present on the aerodrome ("[..] and information on the capability to remove disabled aircraft, expressed in terms of the largest aircraft type").
response	Noted. The comment will be considered in a future rulemaking task.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.A.115(c) p. 87

comment	*33* comment by: *ACI Europe* **Proposed correction:** This GM seems to have an incorrect headline. Our proposed correction should be "Information on rescue and firefighting services".
response	Noted. The comment will be considered in a future rulemaking task.

comment	*65* comment by: *Aerodrome safety regulation departement* The GM should be renumbered A.110 c) in consistence with the related IR.
response	Noted.

The comment will be considered in a future rulemaking task.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.001 p. 87-88

comment *244* comment by: *IAOPA Europe*

Since the intend of the NPA is a regular update of aerodrome rules IAOPA Europe would like to suggest a revision of existing rules on rescue and firefighting that are causing significant problems for General Aviation and which for the same reason recently has been addressed by ICAO.

Currently AMC2 ADR.OPS.B.010(a)(2) requires an airport subject to ADR to provide a certain level of Rescue and Firefighting even when operational rules for GA does not require RFF for the particular flight. In essence ADR regulation requires the airport to offer a service that GA is not required to have.

Before the introduction of ADR the RFF requirement only applied to commercial operations in many European countries and in these countries still nationally regulated airports are not required to offer RFF for non-commercial GA operations.

It is also expereince that in many of these countries, the requirement for RFF is in practice only enforced for commercial operations. In those countries where the RFF requirement is enforced strictly for GA it is causing significant problems.

For example the introduction of ADR has caused regional airports that have always been available to GA 24/7 to require up to 72 hours PPR for early or late flights because the airport needs to know well in advance to be able to call extra firefighting staff on duty. This is too inflexible for many GA operations so people find other places to operate. At the same time the fees have been increased to a prohibitive level for GA, because the GA aircraft will be charged the cost of maybe three firefighters to come to work. The COVID19 situation has further aggravated the situation so due to the lack of commercial traffic, airports decide to close their operation due to the cost of maintaining RFF. In several cases these airports could have continued to serve GA without providing RFF.

The result is that GA pilots have moved their operations from regional airports with full facilities and long paved runways into small grass airstrips which are not subject to EU regulation and where there is no requirement for any staff to be on duty.

Before ADR the same flights would take off from full facility regional airfield with a controller in the tower who could alert the municipal firefighting service in case there was an accident. Now they are instead operating from a small grass strip with absolutely nobody to observe if there is an accident. This has caused a clear reduction in safety and is not making good operational use of available facilities.

ICAO has also recently recognised the problem that the requirement for RFF is disproportionate for non-commercial GA operation and on 17. September 2020 issued a State Letter proposing to ammend the requirement for rescue and firefighting as follows:

>>
Rescue and firefighting equipment and services shall be provided at an aerodrome when serving commercial air transport operations.
<<

(new wording underlined)

The rationale in the ICAO State Letter is as follows:

>>
RFF requirements create a significant burden for GA pilots and airport operators due to the expense required to maintain a fire brigade at a small general aviation aerodrome. This frequently restricts the operating schedule for these facilities in an effort to avoid the associated RFF expenses. When this expense is spread over only forty to fifty daily operations (typical at many small general aviation aerodromes), the cost to individual pilots and airport operators becomes prohibitive.

The mandatory provision of services has caused:

- airports to be closed when no RFF was available (at the end of normal working days or on holidays);

- some airports to be open only on weekends when there is enough activity to pay for RFF on the field; and

- more recently with the decline of GA activity world-wide, the closure of airports as they are no longer able to afford the services.

The temporary closure or restricted operating hours of airports is in itself a hazard, particularly to GA aircraft, which have a more limited fuel range, are often restricted to daylight operations and are more constrained by weather conditions.
The requirement has provided little benefit for GA personnel, primarily because the mass, take-off and landing speeds and fuel capacity of small GA aircraft are insufficient to yield the type of take-off or landing accident that would require a aerodrome fire brigade. This contention is supported by the fact that many active GA States either have filed a complete or partial difference with Annex 14 on this issue, relieving those States of the responsibility to provide RFF services at general aviation aerodromes.

When proposing this change, the self-responsibility identified in the Foreword to Annex 6, Part II was considered a key element in accepting a reduced level of safety for GA operations.
>>

IAOPA Europe *p*roposes to adopt the ICAO proposaland revise ADR.OPS.B.010 Rescue and firefighting services so item (a) is rephrased as follows:

(a) The aerodrome operator shall ensure that:
(1) aerodrome rescue and firefighting facilities, equipment and services are provided for all commercial air transport operations;

	The corresponding AICs should be updated accordingly. The airport should be required to inform via AIP or NOTAM when RFF is available so an non-commercial operator can make a proper risk-assessment if facilities are adequate for the intended operation.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC2 ADR.OPS.B.011(b) p. 88

comment	*66* comment by: *Aerodrome safety regulation departement* We consider ATS could be added to the list of ORGANISATIONS INVOLVED IN THE REMOVAL OF DISABLED AIRCRAFT as this entity is referred to in GM2 ADR.OPS.B.011 Removal of disabled aircraft point b)1)ii)
response	Accepted. AMC2 ADR.OPS.B.011(b) is amended accordingly.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.011 p. 89

comment	*172* comment by: *Europe Air Sports* Pages 89 to 92/118 GM2 ADR.OPS.B.011 Removal of disabled aircraft Please take a second look at the proposals at Agency level. Rationale: We think that possible new technologies are not adequately dealt with, that only liquid fuels are covered, that the topics generated by electric propulsion or hydrogen as energy source are not considered.
response	Noted. When more information is available on electric or hydrogen energy sources, EASA will update the GM.

3.3. AMC/GM to Part-ADR.OPS - GM2 ADR.OPS.B.011 p. 89-92

comment	*2* comment by: *Stefan Stroeker* Ladies and gentlemen, regarding item (c)(4) I would recommend to add the attribute 'serviceable' in front of 'aircraft removal equipment kits'. That should mean that only the use of serviceable and, if applicable, calibrated tools is accepted.

	Regarding item (c)(5) I would recommend the add the attribute 'approved' in fron of 'aircraft data'. This should also refer to EASA's Implementing Rules of Initial and Continuous Airworthiness. Only approved data is reliable and current. With kind regards Stefan Ströker
response	Item (c)(4) Accepted. Paragraph (c)(4) of GM2 ADR.OPS.B.011 is amended accordingly. Item (c)(5) Not accepted.

comment	*67* comment by: *Aerodrome safety regulation departement* 1- Shouldn't this GM be referring to appropriate regulations such as Regulation (EU) No 996/2010 and R UE 376/2014 as regards the requirements in the event of incidents or accidents and reporting of occurences? Wouldn't a notification of all entities identified by those regulations be expected (ATS, aerodrome and aircraft operator) in such a case ? There seems to be a contradiction in requiring the identification of a person responsible for notifying te accident to the investigation authority in the provisions applicable to aerodrome. 2- Shoudn't be provision b)3) be reflected to in the OPS regulation so as to be taken into account by aircraft operators ?
response	1. Accepted. Paragraph (a) of GM2 ADR.OPS.B.011 is amended accordingly. 2. Noted.

comment	*128* comment by: *BMVI (LF 15)* For matters of standardization, we suggest adapting the format of the content of the disabled aircraft removal plan document according to 'GM3 ADR.OPS.B.005(a) Content of an aerodrome emergency plan document', by listing only the headings, but not the exact tasks, since those may vary due to the different kind of traffic and structures at the aerodromes. Otherwise, the recommendations on the plan for removing a disabled aircraft would be far more detailed compared to the plan for the rescue of aircraft/passengers after/during an accident. A cross reference to ICAO ASM –Part 5 - Removal of Disabled Aircraft could also be used as alternative way of illustration.
response	Not accepted. GM2 ADR.OPS.B.011 provides as guidance material an outline of a disabled aircraft removal plan.

comment	*308* comment by: *European Powered Flying Union* Please take a second look at the proposals at Agency level. Rationale: We think that possible new technologies are not adequately dealt with, that only liquid fuels are covered, that the topics generated by electric propulsion or hydrogen as energy source are not considered.
response	Noted. When more information is available on electric or hydrogen energy sources, EASA will update the GM.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.070(c)(1) p. 92

comment	*87* comment by: *Zurich Airport* Supported.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.070(c)(2) p. 93

comment	*88* comment by: *Zurich Airport* Supported.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.070(c)(2) p. 93

comment	*89* comment by: *Zurich Airport* To AMC1 ADR.OPS.B.070(c)**(3)**: Supported; document should be kept simple.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.070(c)(3) p. 93

comment	*34* comment by: *ACI Europe* **Proposed Correction of typographical error:** (b) Regular maintenance works ***may be*** covered by a general safety assessment that covers the respective maintenance.
response	Accepted.

comment	*90* comment by: *Zurich Airport* Supported.
response	Noted.

comment	*129* comment by: *BMVI (LF 15)* We would suggest to further explain or specify this sentence in order to prevent misunderstandings.
response	Noted. The comment is unclear because it does not specify the sentence.

comment	*267* comment by: *AESA Spain* regarding AMC1 c (3) Consider replacing "provide" with "approve". Works authorization documents could be developed and delivered by other parties and approved by the aerodrome operator.
response	Not accepted. The works are authorised by the aerodrome operator. Safety assessments can be conducted by different organisations, however the authorisation document is provided by the aerodrome operator.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.070(c)(5) p. 93-95

comment	*35* comment by: *ACI Europe* **Proposed change:** a closed marking as defined in CS ADR-DSN.R.855(c) is displayed, or alternatively runway closure marker placed on a temporarily closed runway, or taxiway, or a portion thereof; if it is not possible to place markings/markers directly on the runway due to construction works, it shall be placed at the nearest point next to the RWY. **Rationale:** The paragraph does not support aviation safety and should be reformulated, because it sets inconsistent rules and leads to taking risk of landing onto a closed RWY. Clear rules are set for long-term closures, which is fine here. For "short duration" closures, the regulation allows releasing of safety barriers, i.e. to take risks for a short time. A short-term closure (a definition of this term may be helpful) cannot be considered less risky. On the contrary, long-term closures are planned in detail and published well in advance by AIP SUP, and there is a high probability that the information will reach the crews promptly. The short-term closure can only be covered by NOTAM, even at the last minute, the information is not part of the flight documentation and especially for aircraft with a loss of radio contact there is a risk of landing on a closed runway. Even the suffix "and adequate warning by air traffic services is provided" does not support Safety: "Closed marking" is a physical, visual Safety barrier. Therefore an "adequate barrier" should also be

	visual (very important in cases of loss of contact or orientation). However, Air Traffic Services do not have adequate visual barriers, it can only inform by NOTAM and ATIS, which is not an additional barrier (it is a standard) nor is it visual, ie completely ineffective for aircraft with loss of contact. We therefore propose to rephrase the clause towards a unifrom rules for all types of closures irrespective of the duration of the closure.
response	Not accepted. As explained in the NPA, the AMC consolidates existing AMC and elaborates further on the content of the procedure to return worksite to operational use. In regard to the positioning of the closed runway making, this is in accordance with ICAO Annex 14 .

comment	*36* comment by: *ACI Europe* Paragraph (1),(2) and part of (3) were transfered from CS ADR-DSN.R.870 Unserviceable areas (former paragraphs a) and b)). **Proposed change:** Add the words "Applicability" and "Location" to the text. **Rationale:** Better readability, gives context & structure to the text and helps to better understand its meaning. We propose to keep this throughout the document where applicable.
response	Noted. The structure of the implementing rules, AMC and GM is different from the CS. However, all the required information is included in the AMC.

comment	*37* comment by: *ACI Europe* **Proposed change to AMC1 ADR.OPS.B.070(c)(5) Aerodrome works safety (b)(1):** The term "adequate warning" for aerodromes works needs to be specified. Examples should be given in GM. **Rationale:** Better clarity. **Proposed change to item (d)(3):** In point (d)(3) a 3.6 m wide transverse stripe is required when a threshold is temporarily displaced. In Figure L-3 of CS-ADR-DSN the width of a temporary transverse stripe is indicated as '1.2 m minimum'. Point (d)(3) does not correspond with Figure L-3 of CS-ADR-DSN.
response	Not accepted. 'Adequate warning' is part of an existing text and in line with ICAO Annex 14. Please refer to Regulation (EU) 2020/2148 which includes the cases where a NOTAM is required. Furthermore, SERA detail how information is transferred to the flight crew by air traffic services.

	In regard to the second comment, the proposed marking refers to case when there are runway pavement overlays and threshold displacements.
comment	*68* comment by: *Aerodrome safety regulation departement* 1- MARKING AND LIGHTING OF UNSERVICEABLE AREAS a)3) These provisions are way too detailed compared to the PANS-ADR. The PANS-ADR provisions would be sufficient at the level of an AMC (see 4.3.8 c) and note 3)). We would prefer the aerodrome operator to adapt the marking and lighting to the configuration of the works than giving them minimum requirements that might not be always appropriate. 2 - CLOSED RUNWAYS AND TAXIWAYS, OR PARTS THEREOF See our comment regarding CS ADR.DSN.R.855 3- WORKSITE RETURN TO OPERATIONAL USE c)2) We propose to add "lights" to the list of equipments which condition should be checked before return to operationnal use, as follows : c) (2) the inspection of the affected areas for operational serviceability including the condition of pavements, signs, lights and markings, presence of FOD or surface contaminants such as dirt, sand, or loose objects; and
response	Noted. Marking and lighting is in accordance with ICAO Annex 14, which in any case are the minimum requirements and they cover all the cases. In regard to the inclusion of the lights, this is accepted.
comment	*91* comment by: *Zurich Airport* Supported.
response	Noted.
comment	*105* comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)* **AMC1 ADR.OPS.B.070(c)(5) Aerodrome works safety (3), page 94** We inquire for visual examples of the markers and lights that are stipulated in AMC1 ADR.OPS.B.070(c)(5)(a) (3).
response	Noted. The comment is not clear.
comment	*130* comment by: *BMVI (LF 15)*

	(b)(1) / (b)(5) Since the subitems in CS ADR-DSN.R.855 and CS ADR-DSN.R.870 were deleted, the references in this AMC should be adapted accordingly (reference to only CS ADR-DSN.R.855 / CS ADR-DSN.R.870).
response	Noted.

comment	*268* comment by: *AESA Spain* This requirement is more related to ADR.OPS.B.110. Runway Closure than to reduced runway lenght operations. Consider recoding.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.070(c)(6) p. 95-96

comment	*38* comment by: *ACI Europe* **Proposed change:** (9) the requirement to use of lookouts and/or listening watch on the appropriate ATS frequency, ***if required***. **Rationale:** Not all aerodrome work would require this.
response	Accepted.

comment	*69* comment by: *Aerodrome safety regulation departement* In point b)14) we suggest to add a mention to restrictions due to LVP.
response	Accepted.

comment	*92* comment by: *Zurich Airport* Supported.
response	Noted.

comment	*269* comment by: *AESA Spain* This text is affecting comepetencies that fall out of the scope of Civil Aviation Authorities, and others out of the scope of Reg 139. We dont see how this will benefit the current scenario in terms of increasing safety.
response	Noted. It is not clear which part of the proposal falls out of the scope of the CAAs.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.070(c)(5) p. 100-101

comment	*39* comment by: *ACI Europe* **Clarification:** What is the intention / the meaning of changing "should be" to "are" at several points of this GM?
response	Noted. The verb is changed because it is a GM and the term 'should be' is used for AMC.

comment	*270* comment by: *AESA Spain* This requirement is more related to ADR.OPS.B.110. Runway Closure than to reduced runway lenght operations. Consider recoding.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.070(d) p. 101

comment	*93* comment by: *Zurich Airport* Supported.
response	Noted.

comment	*210* comment by: *FOCA Switzerland* The AMC should be in yellow
response	Accepted.

comment	*271* comment by: *AESA Spain* SMS terminology might be confusing and here the text is mixing risk mitigation with hazards.. proposal of rewording: "identify and assess the associated risk and mitigate as necessary the potential hazards before, during, and on cessation of operations with reduced declared distances available and works-in-progress in order to ensure the safety of aircraft operations;"
response	Partially accepted. Text is revised in accordance with SMS terminology.

comment	*272* comment by: *AESA Spain* it would be desirable to provide further information on how to test this procedures (point 5)
response	Noted. The comment is not clear.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.070(d) p. 102

comment	*94* comment by: *Zurich Airport* Supported.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - GM2 ADR.OPS.B.070(d) p. 102

comment	*40* comment by: *ACI Europe* **Clarification:** Term "safety zones" should be defined and reference to ICAO Doc 9981 'PANS-Aerodromes' clarified for better understaning.
response	Noted. Please refer to the explanation provided in the NPA, which is based on ICAO PANS-ADR.

comment	*95* comment by: *Zurich Airport* Supported.
response	Noted.

comment	*273* comment by: *AESA Spain* This text is introducing safety zones without a definition that should be included on Annex I. It would be needed to provide further information regarding safety zones in order to be able to implement them in a satandirized way. Are this zones matching with the 'protected area of a surface designated for the landing and take-off of aircraft' stadeed note 1 to new GM...
response	Noted. The GM is related to point (a)(3) in AMC1 ADR.OPS.B.070(d). The term 'safety zone' is generic therefore it is not necessary to provide a definition. The GM provides information on the purpose of the safety zone, therefore dimensions should be adjusted accordingly.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.090 p. 102-106

comment	*41* comment by: *ACI Europe* **Clarification:** Does the aerodrome certificate need to be updated with Outer Main Gear Wheel Span (OMGWS)?

	Editorial comment: AMC1 ADR.OPS.B.090 contains only one point; the specification of point (a) can therefore be deleted.
response	Noted. NPA 2020-10 does not propose a change to the Terms of the certificate to include the OMGWS.

comment	*132* comment by: *BMVI (LF 15)* We would prefer the listed items being in accordance with ICAO Circular 305 in order to prevent confusion. Examples: Adding shoulder dimensions and wake turbulence as relevant subitems to (1) wingspan; Deleting the dimension of the OFZ as subitem of (2) Outer main gear wheel span; Adding the OFZ to (6) fuselage width etc.
response	Partly accepted. The list of aircraft characteristics is in line with the corresponding one provided in ICAO's PANS-Aerodromes. AMC1 ADR.OPS.B.090 is amended accordingly.

comment	*200* comment by: *FOCA Switzerland* Federal Office of Civil Aviation (FOCA; Swiss CAA): • on AMC1 ADR.OPS.B.090 (a) (2): delete "(vi) the dimension of the OFZ" (Justification: Delete OFZ as there is no (obvious) relation between the OMGWS and the dimension of the OFZ. Furthermore, the whole chapter "elements to be assessed" would be more accurate if it would be handled as a GM).
response	Partly accepted. AMC1 ADR.OPS.B.090 is amended accordingly. The list of aircraft characteristics is in line with the corresponding one provided in ICAO's PANS-Aerodromes and includes the acceptable means of compliance with the implementing rule.

comment	*236* comment by: *AIRBUS* AMC1 ADR.OPS.B.090 "Use of the aerodrome by higher code letter aircraft exceeding the certified design characteristics of the aerodrome", paragraph (a)(7)(i) Comment: Paragraph (a)(7)(i) of AMC1 ADR.OPS.B.090 is proposed to be clarified as follows: (7) Nose *geometry vs cockpit position* ~~characteristics~~

	(i) location of the runway-holding position *taking into account OFZ constraints* Rationale: Clarification on the assessment purpose.
response	Partly accepted. AMC1 ADR.OPS.B.090 is amended accordingly.

comment	*237* comment by: *AIRBUS* AMC1 ADR.OPS.B.090 Use of the aerodrome by higher code letter aircraft exceeding the certified design characteristics of the aerodrome, paragraph (a)(15) Comment: Paragraph (a)(15) of AMC1 ADR.OPS.B.090 is proposed to be clarified as follows: (15) Landing gear geometry, tyre pressure and: • Until 27 November 2024, the aircraft classification number (ACN) values; • As of 28 November 2024, the aircraft classification rating (ACR) values Rationale : As of 28 November 2024, the ACR values have to be considered.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - GM2 ADR.OPS.B.090 p. 106

comment	*9* comment by: *KLM* Wing height should also be added as this is of importance for fueling and de-icing.
response	Accepted. GM3 ADR.OPS.B.090 is amended accordingly.

comment	*173* comment by: *Europe Air Sports* Page 107/118 GM3 ADR.OPS.B.090 Use of the aerodrome by aircraft exceeding… ELEMENTS TO BE ASSESSED – AIRCRAFT CHARACTERISTICS Comment:

	We miss all about electric power/hydrogen, we only found fuel storage, fuelling, de-fuelling respectively. May we ask you to change to “energy supply/storage” and to include such measures that new energy sources require? Rationale: By doing so your document will proactively cover future requirements and developments and thereby speed up innovation and deployment of new, more sustainable technology.
response	Noted. EASA will update the GM when more information will be available.

comment	*238* comment by: *AIRBUS* GM3 ADR.OPS.B.090, paragraphs (1)(i) and (6)(i) Comment: Paragraphs (1)(i) and (6)(i) of GM3 ADR.OPS.B.090 identify the wake turbulence as an element to be assessed. We would need to further understand the impact of the wake turbulence parameter on airport design. Rationale: Wake turbulence affects in-flight operations.
response	Noted. Paragraph (c) of ADR.OPS.B.090 contains the list of aircraft characteristics that have to be assessed for the impact on the aerodrome infrastructure, its facilities, equipment, and operation, and vice versa. The wake turbulence has an impact on the operations, in particular air traffic management.

comment	*239* comment by: *AIRBUS* GM3 ADR.OPS.B.090, paragraph (4) Comment: Paragraph (4) of GM3 ADR.OPS.B.090 should also consider the following aircraft parameters: • door longitudinal position • potential obstacles closed to the door (ex: probes) Rationale: Here-above quoted considerations that would have to be taken into account in the assessment.
response	Accepted.

GM3 ADR.OPS.B.090 is amended accordingly.

comment *240* comment by: *AIRBUS*

GM3 ADR.OPS.B.090, paragraph (5)
ADR.OPS.B.090 (1) Wingspan, GM3 ADR.OPS.B.090 (3) Fuselage length and GM3 ADR.OPS.B.090 (4) Fuselage height.

Comment:

Paragraph (5) of GM3 ADR.OPS.B.090 is proposed to be modified as follows:

(5) Tail height
(i) the dimensions of aeroplane maintenance ~~services~~ facilities

This consideration related to aeroplane maintenance facilities should also applies to GM3 ADR.OPS.B.090 (1) Wingspan, GM3 ADR.OPS.B.090 (3) Fuselage length and GM3 ADR.OPS.B.090 (4) Fuselage height.

Rationale:

Here-above quoted consideration is related to facilities that would have to be taken into account in the assessment.

response Accepted.

GM3 ADR.OPS.B.090 is amended accordingly.

comment *309* comment by: *European Powered Flying Union*

ELEMENTS TO BE ASSESSED – AIRCRAFT CHARACTERISTICS
We miss all about electric power/hydrogen, we only found fuel storage, fuelling, de-fuelling respectively. May we ask you to change to “energy supply/storage” and to include all measures new energy sources require?

Rationale: By doing so your document will today already cover future requirements/developments.

response Noted.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.095(b) p. 108

comment *133* comment by: *BMVI (LF 15)*

We suggest to change the order of the bullet points in the order of relevance. It should be always the main goal and first priority to try to eliminate the hot spot (i.e. constructional measures, avoidance, renaming of twy). If that would not be possible, the next step would be to mark or light the hot spot etc. If all that would not work, the remaining option is to initiate awareness campaigns and publish the hot spot in the AIP.

ICAO PANS-ADR seems to follow the order of prioritization:
1.3 If hot spots are identified, the recommended strategy should be implemented to remove the hazard and, where this is not immediately possible, manage and mitigate the risk. These strategies may include:
a) construction of new taxiways;
b) additional visual aids (signs, markings, lights);
c) use of alternative routings;
d) mitigating against blind spots in the aerodrome control tower;
e) awareness campaigns; and
f) publishing the hot spot in the AIP.

response: Accepted.

Text revised as proposed.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.B.095(c) p. 109-111

comment *275* comment by: *AESA Spain*

we propose to include in the GM the best practices for hot spot identification on hot spot charts included in EAPPRI 3.0 (page 105) being the following:
- Each hot spot is depicted by a clear bright red circle and joined to a red label box, providing the assigned designator of the hot spot if applicable (e.g. HS1, here meaning “Hot Spot 1”).
- Large tabulated textual information elaborating the action required of pilots in and around the hot spot.
This may be inserted on the main aerodrome diagram or on the verso of the chart.
- Additional graphical boxes depicting the hot spots in greater detail. These additional boxes should if possible be linked to the relevant hot spot on the main aerodrome diagram, by lines or arrows.
- Publish specific hot spot pages in cases where the aerodrome diagram otherwise would be too cluttered, to present the hot spots effectively.
- Usage of a colour-coded format assisting the depiction of runways, hot spot areas and normal taxiways.

response: Noted.

The requirements for the presentation of hot spots in the Aerodrome Chart are included in ICAO Annex 4, which will be transposed in another rulemaking task, therefore it is not appropriate to provide a GM at this stage.

3.3. AMC/GM to Part-ADR.OPS - GM2 ADR.OPS.B.100(a) p. 112

comment *1* comment by: *Stefan Stroeker*

Ladies and gentlemen,

	here, I would add a (d) item to cover 'severe weather phenomenoms' like heavy storms (e.g. with hurricane-like winds, tornado & thunderstorm warnings, etc.) Regards Stefan Ströker
response	Not accepted. The specific rule and the related AMC/GM refer to cases other than severe weather phenomena.

comment	*96* comment by: *Zurich Airport* Supported.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.B.110(b)(5) p. 112

comment	*70* comment by: *Aerodrome safety regulation departement* 1-The heading should be renumbered AMC1 ADR.OPS.B.100(b)(5) 2- We suggest the inclusion of new ADR.OPS.B.100 Suspension or closure of runway operations be supported by an updating of the structure of the manual described in AMC3 ADR.OR.E.005 on the related topic.
response	Accepted. The heading is corrected.

comment	*78* comment by: *Zurich Airport* (b) It should be specified if the recommended procedure must be followed too if the Airport Authorities do their regular runway checks and temporarly close a runway for that reason.
response	Not accepted. The specific AMC refers to actions that needs to be taken before recommencement of runway operations. Regular inspections are not considered as suspension of runway operations.

comment	*158* comment by: *ACI Europe* **Proposed change to item (b):** It should be specified if the recommended procedure must be followed, too in the event that the Airport Authorities do their regular runway checks and temporarly close a runway for that reason.

response	Not accepted. The specific AMC refers to actions that needs to be taken before recommencement of runway operations. Regular inspections are not considered as suspension of runway operations.

comment	*212* comment by: *FOCA Switzerland* Federal Office of Civil Aviation (FOCA; Swiss CAA): On AMC1 ADR.OPS.B.110 (b)(5), we suggest to invert points (b) ("a runway inspection under the authorisation of air traffic services is conducted") and (c) ("all vehicles and personnel have vacated the runway and report to the air traffic services"). It makes more sense for the runway inspection to take place after all personnel and vehicles have vacated the runway.
response	Accepted.

3.3. AMC/GM to Part-ADR.OPS - AMC1 ADR.OPS.C.011 p. 112-113

comment	*134* comment by: *BMVI (LF 15)* In determining the PCN values, it is common to calculate the usability of the structure in relation to an aircraft type mix over an estimated flight schedule / certain number of movements that considers a certain period of time. By moving the maximum overload values to AMC level, it should also be considered / discussed that less traffic than estimated in the originating calculation can contribute to relieving the stress on pavements and therefore in proportion single events with higher overload would therefore not further mean a distress on the pavement. Furthermore should be considered, that aircraft manufacturers sometimes issue higher possible overload values than 5% or 10% respectively.
response	Noted.

3.3. AMC/GM to Part-ADR.OPS - AMC2 ADR.OPS.C.011 p. 113

comment	*135* comment by: *BMVI (LF 15)* (see comment No. 134) In determining the PCN values, it is common to calculate the usability of the structure in relation to an aircraft type mix over an estimated flight schedule / certain number of movements that considers a certain period of time. By moving the maximum overload values to AMC level, it should also be considered / discussed that less traffic than estimated in the originating calculation can contribute to relieving the stress on pavements and therefore in proportion single events with higher overload would therefore not further mean a distress on the pavement. Furthermore should be considered, that aircraft manufacturers sometimes issue higher possible overload values than 5% or 10% respectively.

response	Noted.

3.3. AMC/GM to Part-ADR.OPS - GM1 ADR.OPS.C.011 p. 113-114

comment	*42* comment by: *ACI Europe* **Clarifiction:** Meaning of "application rate" is not clear. Please clarify.
response	Noted.

Quality of the document

8. Quality of the document - General comment p. 119

comment	*174* comment by: *Europe Air Sports* Page 118/118 Quality of the document Comment: We are satisfied with the quality, the structure, the clarity, the readability of the document. An impact assessment would have been a positive addition. We deplore the lack of references to new technology.
response	Noted.

comment	*310* comment by: *European Powered Flying Union* We are satisfied with the quality, the structure, the clarity, the readability of the document.
response	Noted.

8. Quality of the document - quality of the impact assessment (IA) p. 119

comment	*311* comment by: *European Powered Flying Union* An impact assessment would have been a positive addition. We deplore the lack of references to new technology.
response	Noted. This NPA has been developed in the framework of 'Regular Updates of Aerodrome Rules' which does not require a regulatory impact assessment. When more information is available on electric or hydrogen energy sources, EASA will update the aerodromes requirements.