



EASA
European Aviation Safety Agency

Mixed operations: CAT, NCC/NCO, SPO

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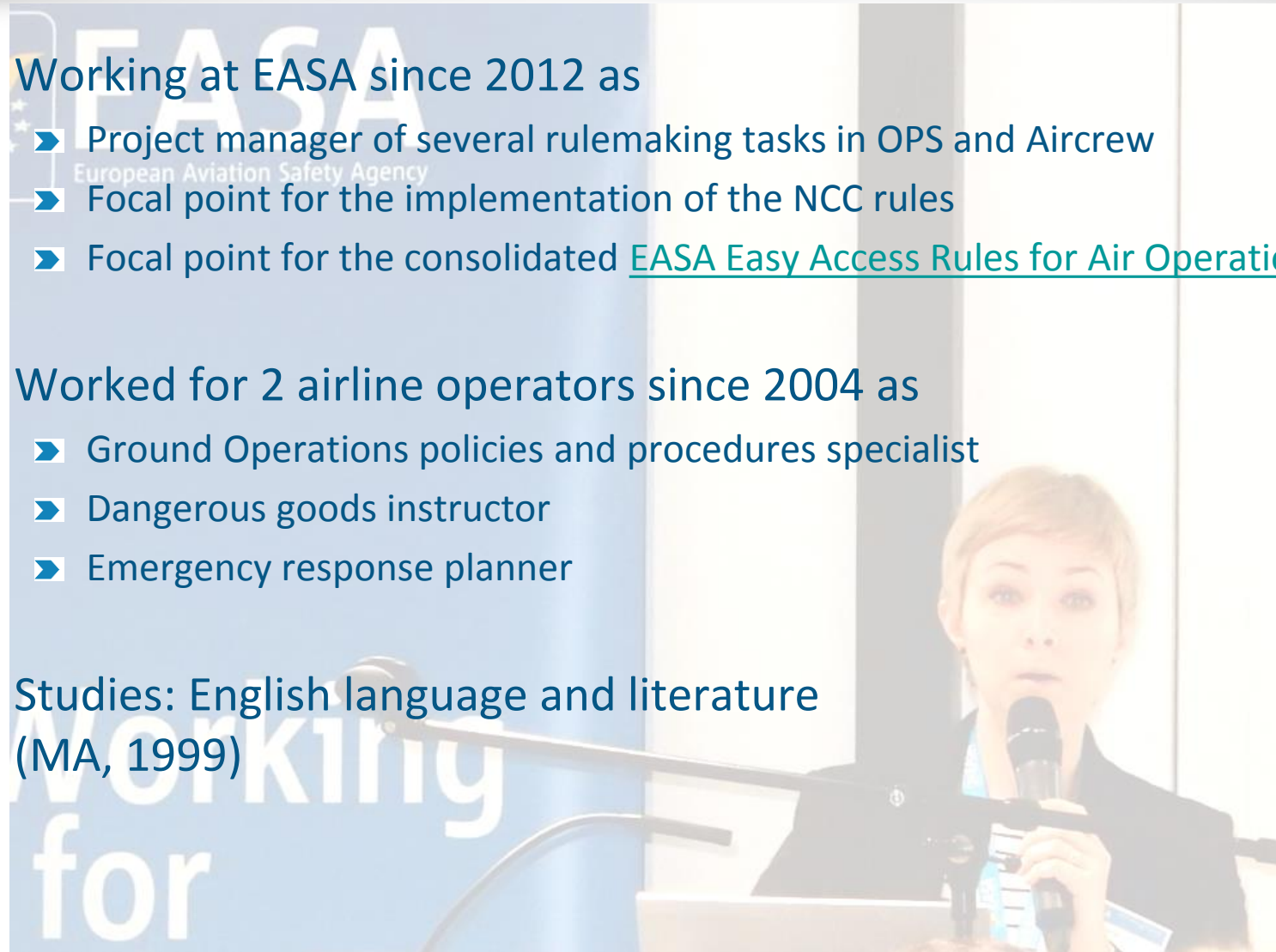
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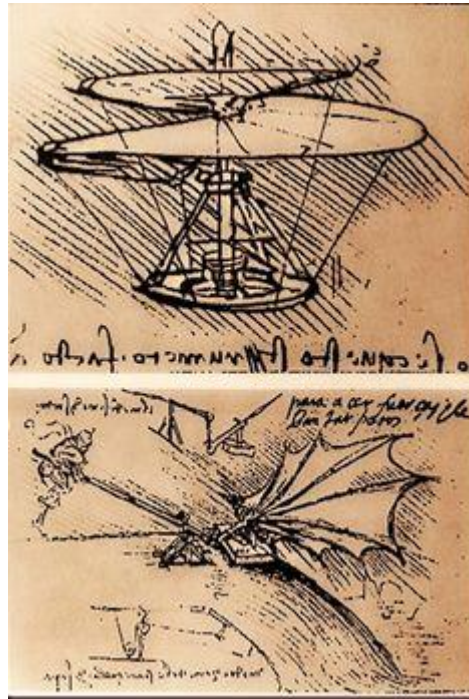
Adina Szőnyi – Résumé

- Working at EASA since 2012 as
 - Project manager of several rulemaking tasks in OPS and Aircrew
 - Focal point for the implementation of the NCC rules
 - Focal point for the consolidated [EASA Easy Access Rules for Air Operations](#)
- Worked for 2 airline operators since 2004 as
 - Ground Operations policies and procedures specialist
 - Dangerous goods instructor
 - Emergency response planner
- Studies: English language and literature (MA, 1999)





Improve rules for current and future needs





Mixed operations – possible scenarios

1. Mixed operation of an aircraft by the same operator (AOC holder)
2. Mixed operation of an aircraft by an AOC holder and other operators, which are not AOC holders



Scenario 1: only one operator involved

**Mixed operation of an aircraft
by the same operator (AOC holder)**



Mixed operation by the same operator (AOC)

- Any combination of the following types of operation:
 - CAT
 - NCC/NCO
 - SPO



NCC/NCO ops of an AOC holder

- **ORO.AOC.125** covers CAT and NCC/NCO:
 - The AOC holder shall:
 - identify the applicable requirements (=> some operators choose to apply CAT procedures to their NCC flights);
 - describe in its Ops Manual the operating procedures when different from those used for CAT operations (OM-A, Ch. 8.7 'Non-revenue flights');
 - ensure personnel knows procedures;
 - obtain prior approval for those different ops procedures.
- No declaration is required for the NCC operations.



ORO.AOC.125 – For info

ORO.AOC.125 Non-commercial operations of aircraft listed in the operations specifications by the holder of an AOC

- (a) The holder of an AOC may conduct non-commercial operations with an aircraft otherwise used for commercial air transport operations that is listed in the operations specifications of its AOC, provided that the operator:
 - (1) describes such operations in detail in the operations manual, including:
 - (i) identification of the applicable requirements;
 - (ii) a clear identification of any differences between operating procedures used when conducting commercial air transport and non-commercial operations;
 - (iii) a means of ensuring that all personnel involved in the operation are fully familiar with the associated procedures;
 - (2) submits the identified differences between the operating procedures referred to in (a)(1)(ii) to the competent authority for prior approval.



SPO activities of an AOC holder

- ORO.AOC.125 does not cover SPO flights.
- This means:
 - All SPO provisions shall apply:
 - Part-ORO
 - Part-SPA – as applicable
 - Part-SPO for CMPA or Part-NCO for non-commercial other-than-CMPA).
 - Like any SPO operator, the AOC holder must submit a **declaration** for its SPO flights (ORO.DEC.100)
 - **Authorisation** is needed for high-risk commercial SPO

➤ *CMPA = complex motor-powered aircraft*



Scenario 2: more than one operator involved

**Mixed operation of an aircraft
by an AOC holder and other operators,
which are not AOC holders**



Hypothetical case of mixed operation

► The same aircraft is used:

<i>Early morning:</i>	by the AOC holder for a CAT flight
<i>Late morning:</i>	by an SPO operator* for an aerial photography flight *: It may be the same AOC holder, which is also a declared SPO operator.
<i>Noon:</i>	by another operator (Owner) for a private flight (NCC/NCO)
<i>Afternoon:</i>	by an ATO for a training flight
<i>Next morning:</i>	by the same AOC holder for a CAT flight



Leasing between AOC and NCC/NCO

- Aircraft must be timely removed from AOC when dry leased-out (ARO.OPS.110(d)(2)).
- NCC/NCO operator has full operational control.
- NCC/NCO operator operates according to Part-NCC/NCO.
- No other provisions on dry lease-in for an NCC or NCO operator.



Leasing between AOC and SPO

- Aircraft must be timely removed from AOC when dry leased-out (ARO.OPS.110(d)(2)).
- SPO operator has full operational control.
- Provision applicable to the SPO operator:
 - Only lease of third country-registered aircraft covered (ORO.SPO.100(c)):
 - Needs prior approval of the competent authority.
- No other provisions on dry lease-in for an SPO operator for aircraft registered in EU.



Is this possible now?

➤ The same aircraft is used:

<i>Early morning:</i>	by the AOC holder for a CAT flight
<i>Late morning:</i>	by an SPO operator* for an aerial photography flight
	*: It may be the same AOC holder, which is also a declared SPO operator.
<i>Noon:</i>	by another operator (Owner) for a private flight (NCC/NCO)
<i>Afternoon:</i>	by an ATO for a training flight
<i>Next morning:</i>	by the same AOC holder for a CAT flight

NO!



Address current & future operational needs

- New rule proposal (possibly new ORO.GEN.111):
 - Enable the use of aircraft included in an AOC by other operators, non-AOC holders;
 - Identify the aircraft used by other operators in the AOC holder's documentation;
 - Require a procedure to identify which operator is responsible for operational control for each flight outside AOC;
 - Describe how the shift of operational control is communicated between operators.



New rule proposal (cont.):

- The other operator's responsibilities (NCC/NCO or SPO):
 - Comply with the applicable requirements;
 - Record every flight in the aircraft technical log system;
 - Contact the AOC holder for any technical issue of the a/c while under its operational control;
 - Report any occurrence to the AOC holder in due time and before next CAT flight.
- Continuing airworthiness remains with the AOC holder.



Would this be possible THEN?

► The same aircraft is used:

<i>Early morning:</i>	by the AOC holder for a CAT flight
<i>Late morning:</i>	by an SPO operator* for an aerial photography flight *: It may be the same AOC holder, which is also a declared SPO operator.
<i>Noon:</i>	by another operator (Owner) for a private flight (NCC/NCO)
<i>Afternoon:</i>	by an ATO for a training flight
<i>Next morning:</i>	by the same AOC holder for a CAT flight

YES!



Are we there yet? Almost!

1. Mixed operation of an aircraft by the same operator (AOC holder) ✓
2. Mixed operation of an aircraft by an AOC holder and other operators, which are not AOC holders) ✓

Opinion to be published
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