

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1	Front cover MCAR 139C	TMA	<p><u>Seaplane Platform License Name</u> Suggest to reword as station. Seaplane station license OR as per Nazimbe CAT B Aerodromes.</p> <p><u>Nazim Comments</u> 1. It is kind of demeaning when we say Seaplane Platform Certificate/License as it is not only the platform that we address so a common name befitting should be used. 2. CAA normally uses Certification for aerodromes therefore it is suggested that we use Seaplane Station Certificate instead of License...</p>	Not accepted. The definition for seaplane platform license is defined in the definitions.	
2	Definitions Page 8, Chapter 1, 1.3	TMA	<p><u>'Protected Areas'</u> Differ from the definition stated in MCAR138B. Definition in 138B is more suitable.</p>	Accepted. Will change accordingly after reviewing.	<b>'Protected Areas'</b> – an area which is protected from large waves. The structure providing protection can be natural or constructed.
3	Page 9 Chapter 2 2.1.1	TMA	This statement can be meant as two different type of applications. as if can apply separately for seaplane platform and water runways. can be written as "seaplane station license" or CAT B License	Accepted. Will change.	2.1.1 Licensing of seaplane platform...
4	Page 9 Chapter 2 2.1.2	TMA	There is no flexibility for operations before licensing to support the initial licensing processes hence there shall be an adhoc approval of 6 months and later can be extended another 6 months until license is issued by MCAA like we had earlier? In water aerodromes rules A, 1.16 talks about interim water aerodrome certificate something similar can be written for platforms licenses as well.	Partially accepted.	Refer to regulation clause 1.3

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5	Page 9, Chapter 2, 2.1.3	TMA	<p>For every season we have to send the application again, when relocating the platform seasonally.</p> <p>If there is an intention of moving the platform to any other site due to seasonal requirements, the new position should be notified in the application form.</p> <p>In the application form it could be difficult to write down all the coordinates but the arial chart that is included with the application form gives all the seasonal changes that will happen/required.</p> <p>So, it is suggested that we amend the statement to read as "If there is an intention of moving the platform to other locations due to seasonal requirements then these should be included in the application documentation".</p>	Accepted. We will be rephrasing the clause.	"If there is an intention of moving the platform to other locations due to seasonal requirements then these should be included in the application documentation".
7	Page 9 Chapter 2 2.1.5	TMA	MOT. MOD and MOF it was agreed that CAA will get the NOCs	Partially accepted. We will remove 'no objection letter from ministry of defence'. The rest of the no objection letters are already obtained by the operators.	Refer to regulation
8	Page 11 Chapter 3 3.1.1	TMA	We should also give option here to issue perpetual aerodrome license from CAA without any expiry dates like C of A and then ask operator to devise a system in place similar to ARC where the aerodrome license issued by CAA will be valid provided an inspection certificate like ARC is issued by either CAA or delegated to operator quality system for 3 years. MCAA shall only	Not accepted. Accepting this changes the entire philosophy and rationale of the regulation.	

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			exercise issuance of this certificate either every 3 years or may completely delegate it to operator quality system and may only choose to conduct spot checks as and when required.		
9	Page 14 Chapter 4 4.3	TMA	Sea currents are very difficult to attain. In fact I don't believe there is any live data available for that. Instead can be written as tide information.	Accepted. We will remove 'sea currents'	4.3 The licensee shall ensure that information on/pertaining to current weather conditions at the destination are available prior to departure.
10	Page 14 Chapter 4 4.4	TMA	Should include the operator of the aircraft. The reason being since other operators are also to use the station.	Accepted.	4.4 The licensee, the resort or the seaplane operator shall provide a passenger transfer vessel (PTV) for the purpose of transferring passengers to and from the seaplane platforms.
11	Page 14 Chapter 4 4.6	TMA	Include operator as well	Accepted.	4.6 The licensee and the seaplane operator shall ensure that instructions are given to the PTV vessel drivers about the direction of water runway, and the movements of the aircraft for taxi and the specific time of its arrivals.

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12	Page 16, Chapter 6, 6.1.1	TMA	Refer to the file proposed amendments	<p>Noted.</p> <p>Reply to “proposed approach”: Agree. This regulation does not limit the use of multiple runway configurations.</p> <p>Reply to “Rationale”: Accepted. Will amend the regulation to add the considerations for “surrounding water conditions” as proposed by TMA since it is key factor to be considered.</p> <p>Reply to “Water aerodrome chart &amp; Sample Lines”: Sub-clause 2.2.1 d) allows licensee to show multiple preferred landing/take-off configurations in aerial chart considering the seaplane platform location and environment.</p>	<p>6.6.1 Number and orientation of water runways</p> <p>Water conditions are affected by factors such as tides, currents, and weather conditions. The orientation and location of water runways shall be determined based on the surrounding water conditions and wind patterns.</p> <p>Multiple potential water runway configurations maybe be used at a location to minimize the negative effects of surrounding water conditions and cross winds. Where multiple runway configurations exist, it shall be depicted on the aerial chart.</p>
13	Page 16, Chapter 6, 6.1.3	TMA	This should be changed to 30m, as per the current requirements.	Not accepted.	

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14	Page 16, Chapter 6, 6.1.4	TMA	Should be changed to 0.2m.	Not accepted.	
15	Page 16, Chapter 6, 6.1.5	TMA	Best to remove this, reason being that if we are to use a runway which is protected (like a lagoon), there might be not be enough space available. OR, we can put at least 15m from each side of the preferred take-off line.	Accepted.	Removed from regulation.
16	Page 16 Chapter 6 6.1.6	TMA	5m is sufficient.	Accepted.	6.1.5 Wingtip to wingtip clearance for passing seaplanes (dual directional taxi channels) shall be not less than 5 m.
17	Page 17, Chapter 6, 6.1.6 b)	TMA	Should remove the correspondent to depth of taxi channel. Reason being most of the stations where we maneuver for docking at fixed platform, we give a minimum limit (like not less than 0.2) where they are able to go for docking.	Accepted.	6.1.6 b) The depth of water at the mooring area measured at low water level shall be such that there are no hazards to mooring seaplane.
18	Page 17, Chapter 6, 6.1.6 c)	TMA	There will be few stations where this will have an impact, the distance between two platforms are less than 15m. 5m is more suitable for the operation we are doing. In Male between dock A and Dock B, with parked aircraft is 66m, if 15m is there, no dual directional taxi can be made.	Accepted.	6.1.7 c) The mooring area shall be designed in such a manner as to provide a minimum clearance of 5 m (16.4 ft.) between any part of the seaplane and any object it could come into contact with

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					depending on water level.
19	Page 18 Chapter 6 6.2.2	TMA	It should not be placed in the platform, we have written email exemption in place today not to keep it in platform instead we keep it in the boat which carries the passengers. Kindly align with todays practice this paragraph.	Accepted.	Clause updated, refer to the regulation.
20	Page 18 Chapter 6 6.2.2	TMA	All these equipment can be kept in the boat as well. Multi-tools should be options instead of having individual items? which should be acceptable to CAA	Noted. Emergency box may be placed in an alternative location. Multi tools are also acceptable.	
21	(New clause inserted by TMA)	TMA	The licensee, operator or the resort shall provide a crew transfer vessel (CTV) for the purpose of transferring crew to and from the seaplane buoy/platforms.	Not accepted. This is an internal arrangement between licensee/resort.	
22	Page 19, Chapter 7, 7.1.2	TMA	If to follow the limitations as per MCAR138B. A lot of restrictions will apply for outstations. Please refer the file Proposed amendments Please refer to attached file OLS V2	Partially Accepted.	Clause updated, refer to the regulation.

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23	Page 19 Chapter 7 7.2	TMA	-Please refer to attached word document, 5.2.3 Water runway markers & 5.2.4 Displaced threshold markers.  -Please refer to attached word document, 5.3 Signs 5.3.1.2 A sign shall be provided and displayed on the dock restricting the docking area until instructed it is safe to enter by the flight crew.	Not accepted. Comment not relevant to sub clause 7.2	
24	Chapter 8 Page 19 8.3	TMA	5 years is preferable based on the number of resorts we have currently	Not accepted. 5 years is too long.	
25	Chapter 8 Page 19 8.4	TMA	Once is 3 years shall be better to align with the renewal of licenses as well.	Accepted.	8.4 .....approved training (once every three (03) years) .....
26	Appendix I Page APP 1-6 8.	TMA	We do it quarterly.  Can add rope and emergency box details here too.	Accepted.	8. ....should be inspected regularly...
27	Appendix II Page APP 2-1	TMA	Please add sample here too for review and comments from operator.	Accepted.	Sample chart added to the regulation.
28	Pages V & VI TOC	VILLA	TOC does not align with the regulation chapters. Chapter 8 in TOC is PTV but in the regulations it is Emergency Response Planning and there are no Chapter 9, 10 and 11.	Accepted. Will make changes.	Changes made to TOC.
29	Page 7 Chapter 1, 1.1	VILLA	Suggest using word 'and' after the word 'required resort facilities'	Accepted.	1.1 ....required resort facilities and rescue equipment..
30	Page 7 Chapter 1 1.2	VILLA	This is a regulation. Not a procedure.	Accepted. Changed to regulation	"This regulation is applicable...."

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31	Page 7 Chapter 1 1.3	VILLA	Suggestion: Licensee 'seaplane platform' license holder	Noted.	
32	Page 7 Chapter 1 1.3	VILLA	Suggestion: 'Seaplane' instead of 'aircraft'	Accepted.	Changes made. Refer to regulation.
33	Page 7 Chapter 1 1.3	VILLA	The definition for Water Runway is different for MCAR 138A. Since this is part of 138 series, we suggest the definition be uniform.	Accepted. MCAR 138 A definition updated.	
34	Page 7 Chapter 1 1.3	VILLA	Suggestion: 'Seaplane' instead of 'aircraft'	Accepted.	Changes made. Refer to regulation.
35	Page 7 Chapter 1 1.3	VILLA	1. Our suggestion is using word 'designated or assigned' instead of 'employed'. 2. It should be a person assigned by the operator and not by the platform licensee.	Accepted.	.....Person designated by the licensee....
36	Page 7 Chapter 1 1.3	VILLA	'Protected Areas' - The definition term is not used in the regulation and we suggest removing unnecessary definition.	Accepted.	Removed from regulation.
37	Page 9 Chapter 2 2.1.4	VILLA	Specify the number of CAA inspectors required for the inspection so that regulatory obligation will be clear.	Not accepted. We don't prescribe such numbers in the regulations but normally it's 2 inspectors.	
38	Page 9 Chapter 2 2.1.5(f)	VILLA	Should it read 'council'?	Accepted.	...from island council....
39	Page 9 Chapter 2 2.1.5(g)	VILLA	Suggestion: Rephrase to 'No objection letter from resort owner OR management'.	Accepted.	g) No objection letter from resort owner OR management.
40	Page 9 Chapter 2 2.1.5(k)	VILLA	Please clarify and provide acceptable means of compliance.	The comment is not clear.	



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41	Page 12 Chapter 3 3.3.1	VILLA	In this clause the 'operator' is referred to licensee. So there is a discrepancy between 1.3 and 3.3.1	Accepted.	3.3.1 .... and extended by the licensee twice....
42	Page 11 Chapter 3 3.2.2	VILLA	We would like to inquire where the requirement for Quality System is coming from.	There is no requirement under this regulation for licensee to establish a QMS. But, according to the records more than 90% of current platform licensees are AOC holders and have implemented QMS under AOC requirement. For those licensees who does not have established QMS, CAA will provide acceptance the inspectors.	
43	Page 11 Chapter 3 3.2.3	VILLA	Potential Risk to Aviation Safety will always be there. Suggestion: To rephrase and clarify what would trigger a CAA inspection (eg: Elevated risk to a level intolerable or above a specific score...)	Accepted.	3.2.3 Notwithstanding the privilege granted for the licensee in 3.2.1 and 3.2.2, whenever circumstances reveal an intolerable risk to aviation safety, the CAA shall carryout the inspection specified above for the purpose of extension.
44	Page 14 Chapter 4 4.1	VILLA	There is no use for second sentence, since the first sentence says that it should be made available for all AOC holders.	Accepted.	4.1 The seaplane platform facilities shall be made available for the use of all AOC holders, with the

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					permission of the licensee.
45	Page 14 Chapter 4 4.2	VILLA	There may be circumstances where requests cannot be made by the seaplane, or AOC holder during an emergency. Suggestion: To rephrase “During emergencies the seaplane platform shall be made available to any seaplane operator”	Accepted.	4.2 ..... made available to any AOC holders.....
46	Page 14 Chapter 4 4.3	VILLA	This is not the responsibility of platform licensee. It's the responsibility of the seaplane operator to get the weather information.	Accepted.	4.3 The seaplane operator shall ensure that information on/pertaining to current weather conditions and sea-currents etc at the destination are available prior to departure.
47	Page 14 Chapter 4 4.4	VILLA	Suggest to delete ‘or the resort’ and write ‘The licensee shall provide...’	Partially Accepted.	The licensee, the resort or the seaplane operator shall provide a passenger transfer vessel (PTV) for the purpose of transferring passengers to and from the seaplane platforms.
48	Page 14 Chapter 4 4.7	VILLA	This is applicable to seaplane operator; platform licensee cannot be responsible for this. There is no need of this point since it is already a rule in ICAO Annex II.	Accepted.	Removed from regulation.
49	Page 15 Chapter 5 5.1 (f)	VILLA	Which effect? Please Clarify.	Environmental effects.	f) .....Environmental effects....

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50	Page 15 Chapter 5 5.1 (j)	VILLA	Suggest to use it as stated in the definition; 'Nature Reserved Designated Area' or change the definition.	Accepted.	i) Nature Reserved designated areas shall not be used.
51	Page 15 Chapter 5 5.1 (k)	VILLA	We suggest to use 'leeward side' instead of 'protected waters'	Partially accepted.	k) Water runway strip be free from large obstructing coral rubbles to a definite depth.
52	Page 16 Chapter 6 6.1.3	VILLA	Please clarify if the width of the water runway will depend on the critical seaplane for which the runway is intended.	No. The width is 60m.	
53	Page 16 Chapter 6 6.2.1	VILLA	This comes under heading 'Safety Equipment'. The buoyancy is to do with the structure of the platform and not an equipment.	Accepted.	New heading "Platform Buoyancy" added.
54	Page 16 Chapter 6 6.2.2	VILLA	There is discrepancy between the main clause and item c. The main clause requires it to be on the platform and item c determines the location. We may need to place the box on the PTV.	Accepted.	Clause changed. Refer to regulation.
55	Page 19 Chapter 7 7.1	VILLA	Specify reference to exact section of MCAR 138-A	Accepted. Relevant portions added to regulation.	Clause changed. Refer to regulation.
56	Page 19 Chapter 7 7.2.2	VILLA	Specify reference to exact section of MCAR 138-B	Accepted. Relevant portions added to regulation.	Clause changed. Refer to regulation.
57	Appendix II	VILLA	No sample chart	Accepted.	Sample chart provided.
58	Page 11 Chapter 3, 3.2.4	IAS	What is the relevant knowledge and experience for stated here, further what is the process for acceptance of inspectors by CAA?	Relevant knowledge and experience on the licensing	

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				requirements for seaplane platforms. Acceptance will be based on the experience records and an interview similar to form 4 acceptance.	
59	Page 11 Chapter 3, 3.2.5	IAS	Underwater inspection also needs to be done by the accepted inspector by CAA? Recommends to allow license holder to determine underwater inspection period and extend it base on operational experience and date. Thus, recommend to state license holder shall ensure condition of underwater anchor is not detreated.	Underwater inspection can be carried out by a third party. The accepted inspector shall ensure that the condition is not deteriorated.	
60	Page 12 Chapter 3 3.5.4	IAS	Not less than 30 days notice may to be practical in all circumstances, recommends to state whenever possible.	Partially accepted.	If the licensee wishes to surrender the license, the licensee shall give not less than 7 days, a written notice to the CAA of the date on which the holder will surrender the license.
61	Page 12 Chapter 3.5.6	IAS	Recommends to give a period, example 15 to 30 days.	Accepted.	3.5.6 If CAA cancels a seaplane platform license, licensee shall return the seaplane platform license to the CAA within 7 days.
62	Page 13 Chapter 3 3.6.1	IAS	The timelines given here may not be possible in all circumstances, recommends to state whenever possible.	Not accepted. Better to keep 30 days as CAA has to do inspection prior to transfer. If timeline challenges are there, licensee may communicate with CAA to issue an interim license.	

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63	Page 14 Chapter 4 4.1	IAS	What is the intention of last sentence, if the intent is to allow during emergencies as stated in 4.2, recommend to clearly state here as under normal circumstance it is up to the license holder to allow the operators for usage.	Accepted.	4.1 The seaplane platform facilities shall be made available for the use of all AOC holders, with the permission of the licensee.
64	Page 16 Chapter 6 6.1.1	IAS	How is this demonstrated, what is the acceptable source to take this date, what is the review period of the date to demonstrate this, request to include further guidance, if not remove not less than 95 percent.	Accepted.	Refer amended regulation.
65	Page 17 Chapter 6 6.1.8 c)	IAS	How do we demonstrate this, compliance with point b) doesn't ensure this? If it does recommend to remove.	Not accepted. Point b) is about fixing the platform. Point c) is about safe access.	
66	Page 18 Chapter 6 6.2.2 c)	IAS	It is operationally very difficult to maintain the content of emergency box due to theft, recommends to provide to have the emergency box onboard the transfer vessel.	Accepted.	Clause updated, refer to the regulation.
67	Page 20 Chapter 8 8.4.1	IAS	What are the requirements for this training plan, recommends to provide minimum requirements.	As a minimum training must cover firefighting, emergency rescue scenarios and regulatory requirements. CAA will approve trainings based on this.	
68	Page APP 1-3 Appendix 1,	IAS	3 Anchoring and Mooring System – Confirm if the drawing is the minimum acceptable standard as IASL have upgraded mooring system, similarly with Appendix 1, 4 Mooring Bollard.	This is guidance material.	
69	Page APP 1-7 Appendix 1	IAS	8 Safety Buoy – recommends license holder to determine inspection interval, thus revise it to state licensee shall ensure it is maintained in serviceable condition.	Accepted.	8. ....should be inspected regularly...

Terminology

<b>Accepted</b>	The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text
<b>Partially accepted</b>	The CAA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
<b>Noted</b>	The CAA acknowledges the comment but no change to the existing text is considered necessary.
<b>Not Accepted</b>	The comment or proposed amendment is not shared by the CAA.