

Comments Response Document (CRD) for NPRM 2007-03 "MCAR-OPS 1 Commercial Air Transport (Aeroplanes)"					
Comment No	Para	Comment/Justification	Organisation	CAD Response	Resulting Text
1	various ref	Amend in all sections the "or having a maximum approved passenger seating configuration of more than 9 seats" to more than 19 seats ie 1.780(a)	Operator 1	All instances of this in OPS 1, except for three, are addressed in other comments. Issue 1: 1.470 - operated in accordance with Performance Class A Issue 2: 1.670 - weather radar installed if operated in night or IMC Issue 3: 1.815 - Emergency lighting system should be provided	No changes to text
2	1.035	We will continue to have 2 streams of quality assurance in engineering and operations under the quality system, engineering will be taken care by QCM for the airworthy airplanes where as in the operations department Flight Safety Manager in coordination with chief pilot will look after the quality system of operations. The procedures can be documented in their respective manuals. Flight Safety Manager and Quality Control Manager reports to Accountable Manager and this forms the quality unit.	Operator 1	OPS 1 allows appointment of two Quality Managers (one for Maintenance and the other for Operations) provided that the Operator has designated Quality Management Unit. However, it is recommended to have one Quality Manager.	No changes to text
3	1.255	Fuel policy; add VFR operations: VRF and 30 minutes fuel	Operator 2	OPS 1 requires the Operator to establish a Fuel Policy. Exemption will be issued for VFR Floatplanes	No changes to text
4	1.255	Fuel policy: Add - VFR fuel; A to B plus 30 minutes	Operator 1	See Comment 4	

5	1.605(b)	Amend weighing the aircraft every four years to when there is a variation of more than 5% MTOW	Operator 1	OPS 1 gives the flexibility to use fleet masses within the given tolerances. In this case, aircraft must be weighed at 9 year intervals. (Refer Appendix 1 to 1.605). If the operator submits statistical weighing data, CAD may consider amending the regulation.	No changes to text
6	1.620(e)	Passenger weights for 19 Pax or less, Male 92kg Female 74 kg: Not possible as our payload will be reduced considerably. Keep the current weights	Operator 2	OPS 1 is more lenient than ASC OPS 24. There is the possibility of actual weighing or the Operator may submit a standard weight based on statistical analysis (refer Appendix 1 to MCAR-OPS 1.620(g))	No changes to text
7	1.652	IFR or Night operations: K(2) - remove - pitot heater failure warning indication requirement L - remove for all aircraft under 5700kg	Operator 1	Para K(2) is not applicable to DHC-6 aircraft. L - (standby Artificial Horizon) This will not be exempted	No changes to text
8	1.660(a)	Altitude Alerting System/Ground Proximity Warning System and Terrain Awareness System: Not applicable for sea plane operation	Operator 2	Exemption will be issued for Domestic VFR Operations	No changes to text
9	1.660	Altitude Alerting System - remove requirement for all aircraft under 5700 kg	Operator 1	See Comment 8	
10	1.665	GPWS: Remove for domestic operations	Operator 1	See Comment 8	
11	1.700	CVR-1: Remove for all aircraft under 5700 kg	Operator 1	Not applicable for DHC-6 Aircraft	No changes to text
12	1.705	CVR-2: Remove for all aircraft under 5700 kg	Operator 1	Not applicable for DHC-6 Aircraft	No changes to text

13	1.715	FDR-1: remove for all aircraft under 5700 kg	Operator 1	Not applicable for DHC-6 Aircraft	No changes to text
14	1.730(a)(5)	Shoulder harness for each cabin crew seat required: Keeping it as it is under exemption	Operator 2	Exemption will be issued for DHC-6 aircraft	
15	1.795	Crash axes and crowbars required: With 6 exits for only 16 passengers, suggest keeping max 1 either crash axe or crowbar	Operator 2	OPS 1 is in line with your comment	No changes to text
16	1.795	Crash axes and crowbars: remove for all aircraft under 5700 kg	Operator 1	This will not be exempted for aircraft under 5700 kg	No changes to text
17	1.865	Additional Communication and Navigation equipment required: Not required for VFR operations	Operator 2	Additional com and nav equipment will be exempted for domestic VFR operations, provided a TSO certified GPS is installed	No changes to text
18	1.965(b)(2)	PPC every six months: Keep the same requirements as now: one training flight and one PPC per year	Operator 2	OPS 1 is in line with ICAO Annex 6	No changes to text
19	1.965	Recurrent training and checking(2) - The period of validity for an OPC should be amended from 6 months to 12 months	Operator 1	See Comment 18	
20	1.1002(a)(2)	Single cabin crew member operations require minimum of 20 hours and 15 sectors of in-flight training for new cabin crew: 20 sectors of in-flight training	Operator 2	seaplane sectors may be very short and hence they may be able to meet the sector requirements with only few flight hours. However, CAD feels that the cabin crew might not have sufficient exposure	No changes to text
21	1.1002	Single cabin crew member operations: (a)2 - Remove 20 hours, 15 sectors and replace with the requirement for new cabin crew to fly with an experienced co-pilot	Operator 1	See Comment 20	

22	1.1010(b)	Cabin crew training should include use of Protective Breathing Equipment in an enclosed, simulated smoke filled environment: Not applicable for sea plane operations since flying low altitude, very short flights and unpressurised aircraft	Operator 2	Not applicable for current DHC-6 aircraft operations	
23	1.1095(1.15)	WOCL: Remove for Day VFR operations	Operator 1	When FDP starts in WOCL(0200 to 0559) , maximum FDP is reduced by 100% of its encroachment. Since this relates to human factors, the preferred option is to implement WOCL	No changes to text
24	1.1100	60 hours and 190 hours cumulative duty will be honoured. 100 block hours in 28 consecutive days and 900 hours in 365 days: Include 65 hours of duty with 2 consecutive days off, flying hours 115 per 28 days, flying hours 1000 in 365 days	Operator 2	Operator to apply these limits to current practice for over a month and send the results to CAD for consideration	No changes to text
25	1.1100	Flight & Duty Time limitations: 1.1(a) remove the 28 day limit (b) OK (c) add the option to have 65 hours with 2 consecutive days off in 7 days 1.2 (a) amend the 900 hour limit to 1000 hours (b) amend the 100 hours to 120 hours 1.3 Amend the maximum FDP to 14 hours 1.4 remove 1.5 remove 4. remove	Operator 1	See Comment 24	
26	1.1105(1.3)	Maximum Daily Flight Duty Period of 13 hours: Can agree on 13 hours duty period provided that 14 hours FDP allowed for 2 days per week	Operator 2	See Comment 24	

27	1.1105(1.4)	13 hours will be reduced by 30 minutes for each sector from the 3rd sector onwards with a maximum reduction 2 hours: Not possible for sea plane operation as have to increase the number of crew significantly as explained in the cover-letter as well.	Operator 2	See Comment 24	
28	1.1110(1.1)	Minimum rest provided before undertaking of Flight Duty Period starting at home base shall be at least as long as preceding duty period or 12 hours whichever is greater: Keep the existing 10 hours	Operator 2	See Comment 24	
29	1.1110	Rest 1.1 Amend the rest period to 10 hours 1.2 Amend the rest period to 10 hours	Operator 1	See Comment 24	
30	General	The proposal is acceptable without change	Operator 3	-	-

Note: CAD will amend OPS 1.990 to require a cabin crew for an aeroplane with with a maximum approved passenger seating configuration of more than 9 (instead of 19).