

AOPA-Swedens svar på EASAs remiss ang nya driftbestämmelser.

General		<p>A list of acronyms should have been very supportive.</p> <p>AOPA-S has a feeling this ruling is directed to organizations or enterprises, with a flight department and unlimited resources to produce manuals. A small business will not have a chance to follow this ruling.</p> <p>Article 8.3, Basic Regulation opens for some alleviations for non-commercial operators of complex aircraft. AOPA-S inquires such a relief for owner of VLJs.</p>
OPS.GEN.001	22	<p>It can not be taken for given that an operator of a complex aircraft has a business, the aircraft can be owned as a non-complex aircraft and used in the same way. Such an owner does not have a "place of business" as defined in OPS.GEN.010 (60). This paragraph is not clear which competent authority has the over-sight responsibility. Shall an entity with a place of business outside Europe go to that authority? Also compare with rules for OPS.SPA.001.GEN, where it is stated the State of registry is responsible for those approvals, coordination is needed.</p>
OPS.GEN.010 (22)	23	<p>The acronym DR normally means "Dead Reckoning" in terms of aviation. Therefore a change of acronym should be considered.</p>
OPS.GEN.001 (23)	23	<p>The definition Dry operating mass' does not make any sense for small aircraft if it has to be used.</p>
OPS.GEN.010 (45)	25	<p>The definition has no validity; it is not used in 02b or 22c.</p> <p>In the north of Europe there is no night-time in the middle of summer, so why the restriction of a local operation in the same day?</p>
OPS.GEN.010 (49)	25	<p>In the northern Europe the twilight is much longer than 30 minutes during the summer.</p> <p>The definition of "night" should be the same as NPA-2008-17: <i>'Night' means the period between the end of civil evening twilight and the beginning of morning civil twilight, or such other period between sunset and sunrise as may be prescribed by the appropriate authority, as defined by Member State.</i></p>
OPS.GEN.010 (59)	26	<p>Is a Touring Motor Glider (TMG), mentioned in the NPA 2008-17 to be considered a sailplane or an aeroplane?</p>
OPS.GEN.010	27	<p>Is this a correct definition of a take-off flight path?</p>

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(75)		AOPA-S sees that as a normal take-off, not a take-off with a non-operating engine. It is very difficult to decide that path, depending on where the failure occurs.
OPS.GEN.015 (a) (1)	28	What about the PiC's responsibility in all other aircraft, are they not the same?
OPS.GEN.015 (a) (4)	28	The text should be elucidated to ' <i>to perform emergency functions</i> '. To be able not to serve a drink to the passenger does not always restrict a person to react in a urgent situation.
OPS.GEN.015 (d)	28	If OPS-GEN-015 (a) (4) is changed as proposed above, this paragraph is not needed as extra procedures.
OPS.GEN-030	29	It has still to be possible to carry weapons and ammunitions for a hunting season in a remote area, and also gasoline in a drum for a motor-boat or a snow-mobile in very remote areas
OPS-GEN.147	32	<p>AOPA-S suggest the current Swedish rules: In Sweden there is a possibility to fly according the following conditions in airspace class G: At or below 3000ft MSL or 1000ft GND, whichever is highest:</p> <p>Airspeed max 140 KTS: Flight visibility 3km, Clear of clouds and ground visible from aircraft.</p> <p>In addition, with airport/aerodrome in sight: Lowest visibility 1,5km.</p> <p>The rules should permit a return flight out of Airspace class G into airspace class C also if the visibility at the airport is below 3km. Example: The airport has visibility 2500m. An approaching VFR flight from outside the control zone has 4km visibility but may with the proposed regulation be prohibited from entering the control zone.</p> <p>The 3 km possibility to take off with special VFR should also be possible from non-towered airports, as well as for aircraft taking off with 3km visibility and who wishes to continue outside the CTR. Therefore the VMC-minima of 3km (see above) that are used in Sweden should also in the future continue to be used. Change airspace class G requirements accordingly: (140knots and 3km flight visibility).</p>
OPS-GEN.150 (a) (1)	33	The item does not make any sense. What does it mean with ' <i>except when specially approved by the State</i> ' when it is already in the first part of the

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		paragraph already stated ' <i>specified by the State</i> '?
OPS.GEN.155	34	The sections (b) and (c) should shift, because the current section (b) only refers to multi-engine aircraft. Just for the logic.
OPS.GEN.155 (e) (1)	34	There is no AMC or GM defining reasonable time, AOPA-S proposes plus minus one hour of ETA.
OPS.GEN.155 (e) (3)	34	A definition of isolated aerodrome (referring to planning etc) should be given in the beginning of the Part OPS.
OPS.GEN.170	35	An item together with an AMC without any use. No pilot will plan a CFIT.
OPS-GEN.205 (a)	37	Why a reference here to Annex 4, the only one in the whole NPA?
OPS-GEN.205 (c) (2)	37	AOPA-Sweden does not see the logic to use cruising altitude during day and cruising speed during night and also the reason for more fuel during night-time than day-time
OPS.GEN.215	38	This rule is almost impossible to comply with in some older GA airplanes, because a dip-stick is allowed to measure available fuel, and it is very impractical for a single pilot to creep out on the wing at regular interval to check the fuel during a flight.
OPS.GEN.300 (a)	39	Very few GA-airplanes have an AFM, please also allow a Pilot Operating Handbook (POH).
OPS.GEN.305	39	This paragraph should be transferred to Par M, AOPA-Sweden does not see this as an operative issue.
OPS.GEN.310	39	When reading a paragraph like this, AOPA-Sweden gets a feeling that the agency doesn't want to take responsibility for the next generation of very light jets. It doesn't make any sense to have the same procedures for an individual operating a Piper PA-47 and a major airline operating an Airbus A380, i.e. who shall be the qualified person supervise the loading of a VLJ? Therefore AOPA-Sweden thinks that most of the VLJs will remain in the registers of third countries.
OPS.GEN.320.A (3)	40	V1 does not exist for a single engine aircraft, there is no alternative than to apply brakes in case of engine failure whatever speed.
OPS.GEN.405	41	AOPA-S does not consider a child restraint device necessary for small GA piston driven aircraft.

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OPS-GEN.410 (a)	42	For a VFR flight, there is no need for a precision down to the nearest second. Hours and minutes are enough.
OPS.GEN.410 (b)	42	A VFR-flight is by definition a flight when the attitude is maintained by visual references out of the cockpit and in VMC. AOPA-Sweden does not agree to a need of additional instruments during operations in VFR/VMC, where the desired attitude not can be maintained to one or more instruments. AOPA-S does not see such a scenario. AOPA-S can see a need for VSI during night and a DG during VFR on top.
OPS.GEN.410 (b) (2)	42	Modern aircraft with glass cockpit does not always have turn and slip indicators. The rule should be modified in order to also allow modern glass cockpit aircraft accordingly. I.e. Garmin 1000 glass cockpit.
OPS.GEN.410 (b) (5)	42	None of the instruments listed in OPS.GEN.410 (a) has a need of external power, AOPA-S suggest this point can be deleted.
OPS.GEN.415 (a) (9)	43	A carry-on flash-light should be acceptable for small GA-airplanes with a MTOW <5,700kg.
OPS.GEN.415 (b)	43	This requirement should only be applicable to IFR flights. For VFR flights, AOPA-S does not deem a lighted chart holder necessary and the size of the map will make it impractical to fit in, since the critical parts of the flight will be performed with visual references.
OPS.GEN.420 (h)	45	An electric illumination should not be necessary for non-commercial flights in small aircraft. It will require a huge investments for the owners, because there is no such a requirement today.
OPS.GEN.440 (a)	46	Should be 12,500 ft just to be harmonized with most third country rules.
OPS.GEN.440 (a) (1) (i)	46	Should be 12,500 ft and 14,000 ft respectively, according to above mentioned.
OPS.GEN.440 (c)	47	Not an OPS-requirement, should be moved to Part 21! It is also a requirement impossible to retro-fit on small GA airplanes.
OPS.GEN.450	47	Also not an OPS-requirement, please, keep design requirements within appropriate documents
OPS.GEN.475 (c)	50	Shall include what?? The references seem not to be valid.
OPS.GEN.475 (d)	50	Shall include what?? The reference seems not to

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		be valid.
OPS.GEN.480	50	Seems to be a design requirement, doesn't fit in here.
OPS.GEN.485.A (a)	50	Seems to be a design requirement, doesn't fit in here.
OPS.GEN.485.A (b)	50	Seems to be a design requirement, doesn't fit in here. Does this requirement comply with the security rules?
OPS.GEN.490	50	Seems to be a design requirement, doesn't fit in here.
OPS.GEN.495	51	Seems to be a design requirement, doesn't fit in here.
OPS.GEN.500	52	Seems to be a design requirement, doesn't fit in here.
OPS.GEN.510	53	It should be stated here that this item should override any national criminal law, so the information can not be used in any penalty or certificate action.
OPS.GEN.540.A (c)	54	AOPA-S does not see that an individual owner of an airplane can comply with this paragraph.
OPS.GEN.545	54	Seems to be a design requirement, doesn't fit in here.
OPS.GEN.550	54	There is for some VLJs no MEL issued.
OPS.GEN.610	57	In some of the third country, there is not a requirement to carry a journey log book. As in Sweden the journey log book is issued by the competent authority, who shall issue a journey log book for a third country aircraft?
OPS.GEN.615	57	It should be added that documents, need for the flight shall only be available until the aircraft comes to a stop after a flight, so the cockpit can be cleaned as fast as possible.
OPS.SPA.020.GEN (a) (1)	88	It has to be open for a private pilot/owner to apply too.
OPS.SPA.020.GEN (b)	88	A GA pilot can be flying several aircraft from different owners, and the owner shall not be responsible if a pilot is violating his/hers privileges.
Section II	90	How is this coordinated with EASA NPA 2008-14? Why about the same regulation in two different documents?
OPS.SPA.001.SPN (c) (2) and (3)	90	If the definition of an "operator" is the same as a single private non-commercial aircraft-owner or a small air-club, AOPA-S thinks these requirements

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		are unfeasible impracticable to achieve. It has to be the single pilot's responsibility to keep currency.
OPS.SPA.001.RVSM (b)	91	If the definition of an "operator" is the same as a single private non-commercial aircraft-owner or a small air-club, AOPA-S thinks these requirements are unfeasible impracticable to achieve. It has to be the single pilot's responsibility to keep currency.
OPS.SPA.001.LVO (b)	92	If the definition of an "operator" is the same as a single private non-commercial aircraft-owner or a small air-club, AOPA-S thinks these requirements are unfeasible impracticable to achieve. It has to be the single pilot's responsibility to keep currency.
OPS.SPA.030.LVO (a)	93	AOPA-S does not see a need for two pilots using an EVS system in non-commercial operations.
Section V DG	94	It should be elucidated that this Section V is only for commercial operations, AOPA-S can not comprehend this is for a private pilot bring his hunting-rifle with ammunition or fuel for his cottage on a flight to a remote place without any land communication.
GM OPS.GEN.015 (b)	109	A further definition of "special categories of passengers" is needed.
AMC1 OPS.GEN.115 (4)	126	A passenger briefing card does not exist for the small GA-fleet, and should be dropped off this paragraph to let most of the GA-pilots follow the rule.
AMC1 OPS.GEN.145 (1) (c)	134	It is impossible to predict a take-off flight path, you will never know when the critical engine fails, See definition of take-off flight path, OPS.GEN.010 (75)
GM1 OPS.GEN.145	139	Another point where the author only thinks about major airline and airports. The majority of all movements are done from uncontrolled fields.
AMC OPS.GEN.200	175	Another point where the author only thinks about major airline and airports, even that the context is relevant to GA-operations, but RVR is not used at non-tower airports. The majority of take-offs are from non-tower airports
AMC OPS.GEN.210	176	Indeed, it says "whenever applicable", but it should also be stated that is for commercial operations. To fuel up a small GA-aircraft is about the same to fuel up an automobile, there is no such a requirements for that and regular auto-gasoline is more inflammable.
AMC OPS.GEN.410 (a) (3) 1.	200	This part cannot be applicable on third country aircraft, because if you change the altimeter from

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		hg/inch to hectopascals, the aircraft is not airworthy anymore by the originator. "Should" shall be interpreted as "should"
AMC OPS.GEN.410 (a) (4)	200	"Should" shall be interpreted as "should", because a lot of older aircraft has an instrument indicating in mph and also some few older, usually annex 2 ones, over 2,000 kg indicating in km/h.
AMC OPS.GEN.415 (a) (1)	201	This part cannot be applicable on third country aircraft, because if you change the OAT-meter from Fahrenheit to Celsius, the aircraft is not airworthy anymore by the originator. "Should" shall be interpreted as "should"
AMC OPS.GEN.415 (a) (5)	201	The list should be repeated here, there shouldn't be required to purchase ICAO-documents too.
AMC OPS.GEN.415 (b)	202	An EFB (class not mentioned) can not be the only way to show compliance.
AMC OPS.GEN.420 (a), (d), (f)	202	The equipment should be repeated here, there shouldn't be required to purchase ICAO-documents too.
AMC OPS.GEN.420 (h)	203	See AOPA-S comments above. Not such a requirement today for small GA-aircraft.
AMC OPS.GEN.430 3	204	A reference to an ICAO-document should not be in this rule, because a GA-pilot/owner doesn't have an access to them.
AMC OPS.GEN.435 1.b., 2.b.	204	How to bring the knife end the "ice-saw" through "security"???
AMC OPS.GEN.440 all	204 205	See AOPA-S's comments on OPS.GEN.440.
AMC OPS.GEN.450	206	See AOPA-S's comments on OPS.GEN.450.
AMC1 OPS.GEN.455	206	Do not refer to documents, not available to the reader.
AMC.OPS.GEN.490 all	224- 247	This is a design requirement, doesn't fit in here
AMC OPS.GEN.495 all	247- 248	This is a design requirement, doesn't fit in here
AMC OPS.GEN.500 all	248- 252	This is a design requirement, doesn't fit in here
AMC.OPS.GEN. 610	256	If there is no log book issued, how to do? See our comments above.
AMC OPS.SPA.001.SPN (c) (3)	376	As GA pilots and aircraft owners, we don't have an operations manual, and don't see a need of it either.

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GM1 OPS.SPA.001.SPN	376	See comments above under OPS.SPA.001.SPN
GM OPS.SPA 001.RVSM (b) (2) 2.1.i and j	383	If the pilot is notified by ATC of altitude deviation, there has to be a discrepancy between the transponder encoder and the Air Data Computer. ATC can not, without a height monitoring radar make corrections. An item without any value. AOPA-S suggests a withdrawal of these items or a complete revision
GM OPS.SPA 001.RVSM (b) (6)	384	What about "single pilot system" training?