

Title	Implementing Rules for Air Operations of Community Operators - Part-OPS
NPA Number	NPA 2009-02b

EUROPEAN GLIDING UNION (EGU@online.be) has placed **10** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
6320	TITLE PAGE	1	These comments are the view of the European Gliding Union (EGU).	
6157	B. I. Draft Opinion - Part-OPS	22	Sailplanes are not covered by the paragraph? Should say for example "other than complex motor-power aircraft".	
6165	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.410 Flight instruments and equipment - VFR flights	42 - 43	Regarding sailplanes; magnetic heading can be dispayed by a compass or another device that can display magnetic heading.	
6483	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.410 Flight instruments and equipment - VFR flights	42 - 43	In case of sailplanes, requirement as under (a)(2) for measuring and displaying time (in hours, minutes and seconds) in a sailplane or powered sailplane should be possible also by the pilot having an ordinary watch instead of a fixed one in instrument panel. Justification for this is the limited space sailplanes have, and that there is no time based flight procedures used.	
6174	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.415 Flight instruments and equipment - VFR night flights and IFR flights	43 - 44	Sailplanes (c): Anti-collision lights, nav-lights and landing lights are not necessary for cloud flying with gliders. Proposal: Exclude (a) (4) to (10) for cloud flying with sailplanes.	
6289	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.435 Survival equipment – Motor-powered aircraft	46	If this requirement set in OPS.GEN 435 (a)(2) is applied to powered sailplanes, then we see that this is a disproportional requirement. It would be better for a voluntary choise.	

Cmt#	Segment description	Page	Comment	Attachments
6291	B. I. Draft Opinion - Part-OPS - Subpart A - Section IV - OPS.GEN.520 Flight crew interphone system	53	<p>We don not know any of the Member States currently requiring interphone system in a sailplane. There is not engine noise, only a quiet environment.</p> <p>We suggest the wording of OPS.GEN.520 to be modified so that sailplanes are excluded from this requirement.</p>	
6166	B. I. Draft Opinion - Part-OPS - Subpart A - Section V - OPS.GEN.600 Documents and information to be carried on all aircraft	56	<p>Para (b) shall also apply to sailplanes flying cross-country on closed circuits (i.e returning to the launch aerodrome). There is no possibility to carry all these documents in a cramped sailplane cockpit.</p>	
6168	B. I. Draft Opinion - Part-OPS - Subpart A - Section V - OPS.GEN.605 Documents and information to be carried on non-commercial flights with complex motor-powered aircraft and aircraft used in commercial operations	56 - 57	<p>para (b) (2) shall also apply to sailplanes flying cross-country on closed circuits (i.e returning to the launch aerodrome). There is no possibility to carry all these documents in a cramped sailplane cockpit.</p>	
6170	B. I. Draft Opinion - Part-OPS - Subpart A - Section V - OPS.GEN.610 Journey log book	57	<p>Note: Journey log book in a digital format is already allowed in some countries.</p>	