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Title	Rescue and Firefighting Services (RFFS) at aerodromes
NPA Number	NPA 2015-09

Union des Aéroports français - UAF (p.aliotti@uaf.aeroport.fr) has placed **9** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
77	3. Proposed amendments - GM1 ADR.OPS.B.010(a)(1) Rescue and firefighting services	7	No comment from UAF	
69	3. Proposed amendments - AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services	7 - 9	<p><u>UAF comments</u></p> <p>AMC2 ADR.OPS.B.010 (a) (1) et (a) (2)</p> <p>(a) (1)</p> <p>La suppression du (1) comme prévu par la modification supprime la définition du niveau de protection. L'UAF propose de maintenir le (1).</p> <p>(a) (2)</p> <p>(a) Le terme <i>Expected to use</i> à l'avantage de renvoyer à une intention de calcul dans le cadre de la planification des vols, alors que le terme <i>normaly</i> est lié à un trafic passé qui peut évoluer. Néanmoins il n'apparaît pas suffisamment clair.</p> <p>L'UAF propose de remplacer <i>Expected to use</i> par <i>normaly planned to use</i> et définir le terme <i>normaly</i>, qui correspondrait à un trafic dont le nombre serait supérieur à 24 pendant 3 mois consécutifs.</p> <p>(b) l'emploi du terme <i>may</i> au lieu de <i>shall ensure</i> est préférable.</p> <p>Par ailleurs, dans le (1) il a été utilisé le terme <i>planned to used</i> au lieu de <i>expected to used</i>. Ce premier terme conviendrait mieux à la rédaction du (a).</p> <p>(c) Pour les aérodromes ayant 2 types de trafic différents commercial et cargo il serait souhaitable de préciser que la réduction de niveau ne s'applique que pour les vols tout cargo, courrier, etc..</p>	

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			<p>L'UAF propose de compléter le paragraphe par : For all aerodromes the level of protection...</p> <p>L'UAF propose également de compléter le paragraphe (c) en y précisant pour les vols de tests, les vols de livraison ou de maintenance.</p> <p>L'UAF propose la redaction suivante : <i>test flight should include delivery and maintenance flight</i>".</p> <p>(f) L'UAF soutient pleinement cet article.</p> <p><u>Courtesy translation</u></p> <p>AMC2 ADR.OPS.B.010 (a) (1) and (a) (2)</p> <p>(a) (1) Delete (1) imply deleting the level protection definition. L'UAF proposes to maintain the paragraph (1).</p> <p>(a) (2) (a) Wording Expected to use has the advantage to refer to calculation in a framework of flight planification while normally term is related to a past traffic that can evolve. However it does not appear clear enough. Nevertheless, it seems to be not clear enough. L'UAF proposes to replace <i>expected to use</i> by <i>normally planned to use</i> and define it. In this case, <i>normally planned to use</i> wording should be applicable for a number of flights more than 24 during 3 consecutive months.</p> <p>(b) Change <i>may</i> instead of <i>shall ensure</i> is better. UAF support this change. In the parapgh (1) working planned to use is use instead of de expected to use. First wording is preferable to paragraph (a) wording.</p> <p>(c) For aerodromes having two different types of traffic, both commercial and cargo flights it shall be preferable to specify that the level of reduction is only applicable to all-cargo flights, mail ... L'UAF proposes to complete the paragraphe by: For all aerodromes the level of protection...</p>	

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			(f) UAF fully supports this article.	
70	3. Proposed amendments - AMC3 ADR.OPS.B.010(a)(2) Rescue and firefighting services	9	No comment from UAF	
71	3. Proposed amendments - AMC4 ADR.OPS.B.010(a)(2) Rescue and firefighting services	9 - 10	No comment from UAF	
72	3. Proposed amendments - AMC5 ADR.OPS.B.010(a)(2) Rescue and firefighting services	10	<p><u>UAF Comments</u></p> <p>(a) L'UAF demande la suppression des 2 mn dans le texte car la formulation de l'AMC prête à interprétation. De plus, l'objectif d'atteindre des 2 mn demandes des investissements disproportionnés. L'UAF propose de reformuler le paragraphe (a) de la façon suivante : « (a) rescue and firefighting service achieves a response time not exceeding three minutes with an operational objective of not exceeding two minutes from the initial call to the rescue and fire fighting services.</p> <p>L'UAF soutient pleinement l'ajout de « <i>from initial call</i> ».</p> <p><u>Courtesy translation</u></p> <p>(a) UAF requests to delete the 2 minutes in the text because the actual AMC wording is open to interpretation. Moreover, the objective to reach the 2 min implies disproportionate investment. L'UAF proposes to reformulate paragraph (a) as follow : « (a) rescue and firefighting service achieves a response time not exceeding three minutes with an operational objective of not exceeding two minutes from the initial call to the rescue and firefighting services.</p> <p>L'UAF fully supports addition of « <i>from initial call</i> ».</p>	
73	3. Proposed amendments - GM4 ADR.OPS.B.010(a)(2)	10 - 11	<u>UAF comments</u>	

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	Rescue and firefighting services		<p>Le plan de contingence doit être défini d'autant que l'on retrouve ce terme dans un texte relatif au droit des passagers qui sort du domaine de la sécurité.</p> <p>L'UAF propose soit de le supprimer où soit de le définir.</p> <p><u>Courtesy translation</u></p> <p>The contingency plan should be defined especially because we find this term in a text on passengers rights out of the field of safety.</p> <p>L'UAF proposes to delete it or to define it.</p>	
74	3. Proposed amendments - GM5A DR.OPS.B.010(a)(2) Rescue and firefighting services	11 - 14	No comment from UAF	
75	3. Proposed amendments - GM6 ADR.OPS.B.010(a)(2) Rescue and firefighting services	14 - 16	No comment from UAF	
76	3. Proposed amendments - AMC1 ADR.OPS.C.005 General	16	<p><u>UAF Comments</u></p> <p>Le complément « <i>including those used by rescue and firefighting services</i> » n'apporte rien à l'AMC.</p> <p>L'UAF demande sa suppression.</p> <p><u>Courtesy translation</u></p> <p>Complement of wording: « <i>including those used by rescue and firefighting services</i> » add nothing to the AMC.</p> <p>L'UAF proposes to delete it.</p>	