

OTAR 139 Consultation Comments 30 July 2021 – 31 October 2021

No.	Commentator Date & Source	Document Reference	Comment	Response	Action
1	FICAD	139.77 (b)(5)	Where does that stem from. I can't find a SARP. I am aware of Doc 9184 and I know it is about to be replaced with an updated version; and it makes good sense for airports to maintain master plans but I can't find a SARP.	<i>The recommendation regarding aerodrome master plans will be published next year and is detailed in Annex 14 1.5 Airport Design and Master Plan.</i>	NFA
2	Skyport Bermuda	139.77(b)(5)	The reference is made to OTAC 139-31. But I cannot find OTAC 139-31 in the list of OTACs either in publication or for consultation?	<i>This is an OTAC on Aerodrome Capacity which has recently completed consultation and will be published shortly.</i>	NFA
3	FIGAS	139.77(b)(5)	<p>139.77 (5) maintain a Master Plan for the development of economic feasibility, traffic forecasts and current future requirements.</p> <p>This ICAO recommendation is not directly safety related.</p> <p>Imposing this requirement on airports that are not likely to experience exponential growth and are not in direct competition with other nearby airports is burdensome in terms of resource and finances. Stanley airport is government owned and resourced for the benefit of the outlying population; we do not work within a competitive arena and there is no appetite for expansion or development in the near future so a master plan is of no material or safety benefit.</p>	<p><i>We do treat ICAO SARPS as a mandatory requirement which means that we have to implement these in our OTARs. However, if you look in ICAO Annex 14, Chapter 1.5 Airport Design and Master Plan which will be applicable from December 2021, recommendation 1.5.1 states that it is for "aerodromes deemed relevant by States". That means that neither we, or any of OTAAs, will be insisting that OTs or Aerodromes have this in place as of course, there may be no plans to make significant changes. It is vital that we publish regulations which will cover all of our Territories and we do recognise that each has different types and sizes of operation and local considerations; all of which are important. Some Aerodromes have short and longer-term plans in terms of developments and from our perspective, creating a basic plan may be a more effective method way for keeping the regulatory authorities informed and a better able to monitor progress. There is no intention of imposing this requirement on Aerodromes which are not planning any expansion or development.</i></p>	NFA

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4	Aviation Regulatory Consultancy Ltd	139.103	I don't believe there is a 139.101(a)(3)? If this is a mis-reference it also appears in the current version.	<i>Thank you for the feedback. Agreed. This will be amended.</i>	Paragraph amended.
5	Bjoern Boe		<p>COMMENT: The way the ICAO Annexes are being developed implies that the text (SARPs) becomes increasingly "high level" and leaves more of the detailed information to the PANS documents, and also to manuals.</p> <p>Prime examples are: Annex 14 - PANS Aerodromes Annex 15 - PANS AIM Annex 19 - SMM Annex 6 and 8 - Aeroplane Performance manual (Doc 10064).</p> <p>Thus, there is, in my opinion a need for ASSI to put into the OTAR(s) reference to such documents, for example as acceptable means of compliance, AMC, (i.e if your procedures for aerodrome certification or runway assessment and reporting mirrors PANS Aerodromes) - then you are also considered to be compliant with Annex 14, or as Guidance material (GM) - meaning just that. There must be a distinction since the PANS contains a mix of necessary information (Like the specifications for the NOTAM and SNOWTAM format which are found in an appendix to PANS AIM), and useful information. such as the aeroplane characteristics table in PANS Aerodromes.</p>	<p><i>ASSI OTAR require compliance with OTAR SARPS. PANS AMS are included in those OTACs which provide guidance on specific topics. Relevant OTACs are referred in OTAR Part 139.</i></p>	NFA