

## Comment Response Document - NPA No. ASRS.045/05

# Amendment to Qatar Civil Aviation Regulations No. 002 of 2016 on Air Operations

ASRS.045/05— 01/12/2020

### EXECUTIVE SUMMARY

#### **Issue of Regulations amending the Formal Requirements and Standards, Acceptable Means of Compliance and Guidance Material relating to:**

#### **Air Operations**

The Objectives of the Qatar Civil Aviation Authority are specified in Amiri Decision no. 66 of 2018 and amongst others, are to attain best standards and competencies and ensure civil aviation safety in matters related to air transportation.

The amendments to QCAR 002 of 2016, have been proposed by Notice of Proposed Amendment (NPA) ASRS.045/05 which was issued on 15<sup>th</sup> January 2021.

As at 21 April 2021, 76 comments had been received from (4) different stakeholders:

*QCAA Internal*  
Gulf Helicopters  
Amiri Flight  
Qatar Airways

In general, the comments were constructive and contributed to improving the quality of the proposed regulation.

Breakdown of the comments and answers: **(35)** accepted, **(9)** partially accepted, **(21)** acknowledged(noted) and **(11)** not accepted.

The Authority has proceeded with the promulgation of the amendments to QCAR No 002 of 2016 on Air Operations – Requirements, Administrative Procedures, Acceptable Means of Compliance and Guidance Material as resulting from said accepted, partially accepted and noted comments. The proposed amending Regulation will enter into force on 24 June 2021 and shall be applicable with immediate effect unless otherwise stated within.

Applicability		Process map	
Affected regulations and decisions:	[QCAR No. 002/2016]	Concept Paper:	No
Affected stakeholders:	[QCAA/ Industry]	Terms of Reference:	NIL
Driver/origin:	[Flight Ops Section]	Rulemaking group:	no
Reference:	[ASRS 045/05]	RIA type:	None
		Technical consultation during NPA drafting:	Yes
		Duration of NPA consultation:	3 months
		Review group:	Yes
		Focused consultation:	Yes
		Publication date of the QCAR:	[24/06/2021]

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## **1. Procedural information**

### **1.1. *The rule development procedure***

The Qatar Civil Aviation Authority (hereinafter referred to as the 'Authority') published Notice of Proposed Amendment (NPA) ASRS.045/05 on 15th January 2021, pursuant to Law No. 15 of 2002 on Civil Aviation and in accordance with the QCAA Rulemaking process under QCAR 011 of 2018 and the QCAA Rulemaking Manual.

### **1.2. *The structure of this CRD***

Chapter 1 of this CRD contains the procedural information related to this task.

Chapter 2 (responses to comments) explains why the comments have been accepted or not and specifies the resulting impact on the proposed rules.

### **1.3. *The next steps in the procedure***

Following the closing of the NPA public consultation period and having responded to all received comments in this Comment Response Document, the QCAA proceeds towards promulgation of the resulting text of the amended regulation.

The outcome of the NPA public consultation, as well as of the focused consultation, is reflected in this Comment Response Document (CRD), which is published simultaneously with the regulation.

## 2. Responses to received comments

### 2.1. Detailed individual responses

Response No.	1	Comment Originator(s)	Internal (ASAS Section)
Affected Paragraph	QCAR 002 Definition 128		
NPA Text	'wet runway' means a runway whose surface is covered by any visible dampness or water up to and including 3 mm deep within the area intended to be used.		
Comment	it will be applicable from 4th November 2021 with the implementation of Global Reporting Format		
Alternative Text	N/A		
Response	Noted		
Details	N/A		
Resulting Text	No Change		

Response No.	2	Comment Originator(s)	Internal (ASAS Section)
Affected Paragraph	All applicable paragraphs in QCAR 002 AMCs and GMs		
NPA Text	N/A		
Comment	QCAR002, AMCs and GMs are using classes of approach and runway lighting. The lighting for each class is described. It corresponds to the type of lightings installed on the aerodromes. However the wording of these classes (FALS, IALS, BALS and NALS) is not used in QCAR006, AMCs and GMs.		
Alternative Text	N/A		
Response	Noted		
Details	N/A		
Resulting Text	No change		

Response No.	3	Comment Originator(s)	Internal (ASAS Section)
Affected Paragraph	GM1 CAT.POL.H.225		
NPA Text	N/A		
Comment	GM1 CAT.POL.H.225 contains provisions applicable « after 1 January 2005”. This may be updated		
Alternative Text	N/A		
Response	Noted		
Details	However, this is an explanation of underlying principles which is contained in the guidance material.		
Resulting Text	N/A		

Response No.	4	Comment Originator(s)	Internal (ASAS Section)
Affected Paragraph	Pages 603 to 617		
NPA Text	N/A		
Comment	the right margin is outside of the page and the right end of the text is not visible.		
Alternative Text	N/A		
Response	Accepted		
Details	This has been corrected		
Resulting Text	Margins Corrected		

Response No.	5	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	Article 5, Paragraph 5		
NPA Text	Training organisations referred to in Article 11 of QCAR 001 of 2016 and having their principal place of business in Qatar shall, when conducting flight training into, within or out of Qatar, operate: (a) complex motor-powered aeroplanes and helicopters in accordance with the provisions specified in Annex VI; (b) other aeroplanes and helicopters that are not microlight aircraft, in accordance with the provisions specified in Annex VII.		
Comment	Please remove mention to principal place of business in Qatar. We have many (the majority) certified ATOs not with their principal place of business at Qatar		
Alternative Text	N/A		
Response	Accepted		
Details	The text has been revised		
Resulting Text	Training organisations referred to in Article 11 of QCAR 001 of 2016 shall, when conducting flight training into, within or out of Qatar, operate: (a) complex motor-powered aeroplanes and helicopters in accordance with the provisions specified in Annex VI; (b) other aeroplanes and helicopters that are not microlight aircraft, in accordance with the provisions specified in Annex VII.		

Response No.	6	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	ARO.GEN.355 (a)		
NPA Text	If, during oversight or by any other means, evidence is found by the Authority that shows a non-compliance with the applicable requirements by a person holding a licence, certificate, rating or cabin crew certificate of competency issued in accordance with the Civil Aviation Law and its Regulations, the Authority shall act in accordance with ARA.GEN.355(a) to (d) of Annex VI (Part-ARA) to QCAR 001 of 2016 on Aircrew Licensing.		
Comment	Except the medical requirements, the main applicable requirements to the cabin crew certificate of competency, are not under the QCAR 001. To discuss how and if PEL Section (ARA.GEN.355) may take enforcements actions referring to regulations not under PEL Section scope and responsibilities.		
Alternative Text	N/A		
Response	Noted		
Details	This will be subject to revised Internal Procedures		
Resulting Text	N/A		

Response No.	7	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	NCC.OP.200 (b)		
NPA Text	Notwithstanding (a), when training flights are conducted by an approved training organisation referred to in Article 10a of QCAR 001 of 2016, such situations may be simulated with student pilots on-board.		
Comment	Article 10a does not exists in the QCAR 001		
Alternative Text	N/A		
Response	Accepted		
Details	To refer to Article 11		
Resulting Text	Notwithstanding (a), when training flights are conducted by an approved training organisation referred to in Article 11 of QCAR 001 of 2016, such situations may be simulated with student pilots on-board.		

Response No.	8	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	SPO.GEN.005		
NPA Text	Parachute dropping, sailplane towing or aerobatic flights performed either by a training organisation approved in accordance with QCAR 001/2016 Aircrew Licensing,		
Comment	Only as clarification: The ATOs may be certified by the QCAR N.001 only for training and pilot qualification purpose. They are not certified to perform sailplane towing or aerobatic flights operations. For parachute dropping there is not any provisions on the QCAR N.001 for this type of pilot qualification.		

Alternative Text	N/A
Response	Noted
Details	N/A
Resulting Text	N/A

Response No.	9	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM2 ORO.FC.115 (b)(2)		
NPA Text	training in the operational environment by an instructor holding a certificate in accordance with Commission QCAR 001/2016 Aircrew Licensing;		
Comment	delete Commission		
Alternative Text	N/A		
Response	Accepted		
Details	N/A		
Resulting Text	training in the operational environment by an instructor holding a certificate in accordance with QCAR 001 of 2016 on Aircrew Licensing;		

Response No.	10	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM1 ORO.FC.230 (a);(b);(f)		
NPA Text	ICAO Doc 9995 Chapter 6, which is additional to Qatar regulations,		
Comment	"Additional to Qatar regulations" Statement needs clarification.		
Alternative Text	N/A		
Response	Accepted		
Details	Reference to "additional Qatar regulations" removed		
Resulting Text	ICAO Doc 9995 Chapter 6 contains the guidance for the training and assessment of personnel involved in the conduct of EBT.		

Response No.	11	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM1 ORO.FC.230 (a);(b);(f)		
NPA Text	The examiner may choose between different skill test or proficiency check scenarios containing simulated relevant operations developed and approved by the competent authority. Full-flight simulators and other training devices, when available, shall be used, as established in this Part.		
Comment	'developed and approved by the competent authority'. this part of statement does not exist in Parag. 6 App 9		
Alternative Text	N/A		



Response	Accepted.
Details	Text to be amended accordingly.
Resulting Text	The examiner may choose between different skill test or proficiency check scenarios containing simulated relevant operations. Full-flight simulators and other training devices, when available, shall be used, as established in this Annex (Part-FCL).

Response No.	12	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM1 ORO.FC.230 (a);(b);(f)		
NPA Text	The examiner may choose between different skill test or proficiency check scenarios containing simulated relevant operations developed and approved by the competent authority. Full-flight simulators and other training devices, when available, shall be used, as established in this Part.		
Comment	as established in this Part should be: established in this Annex (Part-FCL)		
Alternative Text	N/A		
Response	Accepted		
Details	Text to be changed accordingly		
Resulting Text	The examiner may choose between different skill test or proficiency check scenarios containing simulated relevant operations. Full-flight simulators and other training devices, when available, shall be used, as established in this Annex (Part-FCL).		

Response No.	13	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM1 ORO.FC.230 (a);(b);(f)		
NPA Text	Part-FCL Appendix 9 Item 1.4		
Comment	As applicable for <b>MULTI-PILOT AEROPLANES AND SINGLE- PILOT HIGH-PERFORMANCE COMPLEX AEROPLANES</b>		
Alternative Text	N/A		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	14	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM3 ORO.FC.115 (a)(1) table		
NPA Text	Part-FCL Appendix 9 Item 1.6		
Comment	As applicable for <b>MULTI-PILOT AEROPLANES AND SINGLE- PILOT HIGH-PERFORMANCE COMPLEX AEROPLANES</b>		

Alternative Text	N/A
Response	Noted
Details	N/A
Resulting Text	N/A

Response No.	15	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM1 ORO.FC.230 (a);(b);(f)		
NPA Text	Part-FCL Appendix 9 Item 3.9.1*		
Comment	must be 3.8.1		
Alternative Text	N/A		
Response	Accepted		
Details	Text to be amended accordingly		
Resulting Text	Part-FCL Appendix 9 Item 3.8.1*		

Response No.	16	Comment Originator(s)	Internal (PEL Section)
Affected Paragraph	GM1 SPO.SPEC.MCF.115 and SPO.SPEC.MCF.120		
NPA Text	In respect of the term 'aircraft category' used in the context of point (a) of SPO.SPEC.MCF.115 and point (c) of SPO.SPEC.MCF.120, it should be understood as 'category of aircraft' as defined in Commission Regulation (EU) No 1178/2011 (the Aircrew Regulation).		
Comment	EU references?		
Alternative Text	N/A		
Response	Accepted		
Details	Text has been amended accordingly		
Resulting Text	In respect of the term 'aircraft category' used in the context of point (a) of SPO.SPEC.MCF.115 and point (c) of SPO.SPEC.MCF.120, it should be understood as 'category of aircraft' as defined in QCAR 001 of 2016 on Aircrew Licensing.		

Response No.	17	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	NCC.GEN.131 Use of electronic flight bags (EFBs)		
NPA Text	<p>'NCC.GEN.131 Use of electronic flight bags (EFBs)</p> <p>(a) Where an EFB is used on board an aircraft, the operator shall ensure that it does not adversely affect the performance of the aircraft systems or equipment, or the ability of the flight crew member to operate the aircraft.</p> <p>(b) Prior to using a type B EFB application, the operator shall:</p> <p>(1) conduct a risk assessment related to the use of the EFB device that hosts the application and to</p>		

	the EFB application concerned and its associated function(s), identifying the associated risks and ensuring that they are appropriately managed and mitigated; the risk assessment shall address the risks associated with the human-machine interface of the EFB device and the EFB application concerned; and (2) establish an EFB administration system, including procedures and training requirements for the administration and use of the device and the EFB application.
Comment	Only Risk assessment + Manual
Alternative Text	N/A
Response	Noted.
Details	N/A
Resulting Text	No change

Response No.	18	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	AMC1 ORO.GEN.110 (j) Operator responsibilities DANGEROUS GOODS TRAINING PROGRAMMES		
NPA Text	e) 1) evidence that instructors meet the qualification and competency requirements of Part 1;4.6 of the Technical Instructions and that course developers meet the qualification requirements of (d);		
Comment			
Alternative Text	N/A		
Response	Not Accepted		
Details	No comments were provided as to why this provision was highlighted.		
Resulting Text	N/A		

Response No.	19	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	ORO.FTL.120 Fatigue risk management (FRM)		
NPA Text			
Comment	Why is FRM only for CAT foreseen, but NCC shall follow more restricted "prescriptive" model.		
Alternative Text			
Response	Accepted		
Details	Provisions have been added in CS.FTL 2 Section A 1.5		
Resulting Text	"If an operator wishes to implement Fatigue Risk Management (FRM) it shall follow the criteria as per ORO.FTL.120 and associated Acceptable Means of Compliance."		

Response No.	20	Comment Originator(s)	External (Amiri Flight)
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Affected Paragraph	GM1 ORO.GEN.110(c) Operator responsibilities
NPA Text	<p>GM1 ORO.GEN.110(c) Operator responsibilities</p> <p>OPERATIONAL CONTROL</p> <p>(a) ORO.GEN.110(c) does not imply a requirement for licensed flight dispatchers.</p> <p>(b) If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3. This training should be described in the operations manual.</p>
Comment	<p>On December 1st, 2020, the ICAO published the long-prepared ICAO DOC 10106 - the replacement of the outdated ICAO DOC 7192 (Issues year 1960).</p> <p>With the ICAO DOC 10106, the new training concept of "Competency based Training" is included as the standard of the training guidelines for future FOO .</p> <p>Therefore QCAA should refer to DOC 10106 and not anylonger to DOC 7192, which is superseded.</p>
Alternative Text	<p>(a) ORO.GEN.110(c) does not imply a requirement for licensed flight dispatchers.</p> <p>(b) If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of Manual on Flight Operations Officers/Flight Dispatchers Competency-based Training and Assessment (ICAO Doc 10106) .</p> <p>This training should be described in the operations manual.</p> <p>(NOTE: For Operators following ICAO DOC 7192 Part-D-3, a 2 years transition till 30-May-2023 will be granted)</p>
Response	Accepted
Details	The text has been amended accordingly
Resulting Text	<p>(a) ORO.GEN.110(c) does not imply a requirement for licensed flight dispatchers.</p> <p>(b) If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of Manual on Flight Operations Officers/Flight Dispatchers Competency-based Training and Assessment (ICAO Doc 10106) .</p> <p>This training should be described in the operations manual.</p> <p>(NOTE: For Operators following ICAO DOC 7192 Part-D-3, a 2 years transition till 30-May-2023 will be granted)</p>

Response No.	21	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	ORO.FTL.105 Definitions		
NPA Text	<p>(12) 'Fatigue Risk Management System (FRMS)'. A data-driven means of continuously monitoring and managing fatigue-related safety risks, based upon scientific principles and knowledge as well as operational experience that aims to ensure relevant personnel are performing at adequate levels of alertness.</p>		

Comment	why is no Terminology for FRM available (see FTL.120)? I suggest to use FRMS within CS-FTL-1 and FMP (Fatigue Management Program) - CS-FTL-2
Alternative Text	(as per ICAO 9933 A2.2. CHAPTER 3.4, SECTION 3.4.2 – OPERATIONAL MANAGEMENT // <b>3.4.2.8 Fatigue management programme:</b> An operator shall establish and implement a fatigue management programme that ensures that all operator personnel involved in the operation and maintenance of aircraft do not carry out their duties when fatigued. The programme shall address flight and duty times and be included in the operations manual.
Response	Partially Accepted
Details	Fatigue Risk Management (FRM) and fatigue risk management system (FRMS) are essentially the same. ORO.FTL.120 leaves out the System part as this is contained under <b>ORO.GEN 200 Management System.</b>
Resulting Text	No Change

Response No.	22	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	ORO.FTL.120 Fatigue risk management (FRM)		
NPA Text	N/A		
Comment	why is no guidance for FRMS available, Either use FRMS or FRM terms		
Alternative Text	N/A		
Response	Partially accepted.		
Details	Guidance is referred to in GM1 ORO.FTL.120 Fatigue risk management (FRM) which refers to ICAO DOC 9966- MANUAL FOR THE OVERSIGHT OF FATIGUE MANAGEMENT APPROACHES		
Resulting Text	N/A		

Response No.	23	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Article 8 Flight time limitations CS-FTL.2 Para-4		
NPA Text	4. Non-commercial operations, including non-commercial specialised operations, with complex motor-powered aeroplanes and helicopters, as well as commercial specialised operations with aeroplanes, helicopters, and sailplanes shall comply as regards flight time limitations, with the applicable requirements specified in CS - FTL 2, in which the operator has its principal place of business, or where the operator has no principal place of business, the place where the operator is established or resides.		
Comment	CS-FTL-2 is the spec FTL scheme for a NCC and other OPR, but last sentence in this PARA, we speak of "Principle place of business", should be removed		
Alternative Text			

Response	Not Accepted
Details	This also applies to organisations that declare their principal place of business as being Qatar.
Resulting Text	No change

Response No.	24	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	10 Delayed Reporting Time in a Single FDP		
NPA Text	10.1 When a crew member is informed of a delay to the reporting time due to a changed schedule, before leaving the place of rest, the FDP shall be calculated as follows. When the delay is less than 4 hours, the maximum FDP allowed shall be based on the original report time and the FDP shall start at the actual report time. Where the delay is 4 hours or more, the maximum FDP shall be based on the more limiting time band of the planned and the actual report time and the FDP starts 4 hours after the original report time		
Comment	There is no additional provision to the Crew discretion , for a delayed departure scenario, which is very common in ad-hoc operation. I suggest to distinguish between delayed-Departure (1st sector), Delayed reporting and delay after 1st sector , I recommend a split of extension: 2-hours before 1st sector (Crew is just waiting), and max 2-hours (NOT 3hrs) Comdr discretion after 1st sector, herefore max 4 hours. Operator would win 1 hour		
Alternative Text			
Response	Not Accepted		
Details	This would require a variation which would need to be supported by an operators safety case.		
Resulting Text	N/A		

Response No.	25	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Certification Specifications and Guidance Material for Air Taxi/Sole Use Charter, Air Ambulance work, Pleasure Flying, and Helicopter Operations CS-FTL.2		
NPA Text	N/A		
Comment	Does not name NCC, though in Article 8 Flight time limitations para 4 specifically mentioned.		
Alternative Text	N/A		
Response	Accepted		
Details	The CS-FTL.2 has been amended to clearly reflect NCC.		
Resulting Text	Refer to CS-FTL 2		

Response No.	26	Comment Originator(s)	External (Amiri Flight)
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Affected Paragraph	Section B The Scheme Introduction
NPA Text	The provisions of this Section set limits on the allowable duty hours and minimum periods of rest for flight crew and cabin crew, employed by holders of a <b>Qatar Air Operator's Certificate</b> . For the purpose of this document flight crew and cabin crew are as defined by QCAR 002 of 2016, as amended.
Comment	NCC operator do NOT hold an AOC, and therefore could be understand, that this para is not applicable, though Article 8 clearly states so...
Alternative Text	...employed by Air Operator under Qatar jurisdiction. (...)
Response	Partially accepted.
Details	The text has been amended to reflect the applicability to NCC operations.
Resulting Text	"The provisions of this Section set limits on the allowable duty hours and minimum periods of rest for flight crew and cabin crew, employed by holders of a Qatar Air Operator's Certificate or undertaking Non-commercial operations, including non-commercial specialised operations, with complex motor-powered aeroplanes and helicopters. For the purpose of this document flight crew and cabin crew are as defined by QCAR 002"

Response No.	27	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	13 Maximum FDP - Aeroplanes		
NPA Text	<b>13.1 Standard reporting times</b> prior to flight must be specified by an operator. Pre-flight duties are part of the FDP. A period of duty must be allowed for post-flight activities: the minimum for major operators is 30 minutes, 15 minutes for others. If this "period" for post FDP duties is routinely exceeded then the post (...)		
Comment	it indicates "Major Operator, which is a term from airlines.GA shall be given a time-slot, and the sentence of "frequent exceedance" give Regulator and Operator a monitoring tool for adjustment, considering "self cleaning activity"etc....		
Alternative Text	A period 15-30mins of duty must be allowed for post-flight activities.		
Response	Partially Accepted		
Details	Text has been amended as below.		
Resulting Text	A period of duty must be allowed for post-flight activities: If this "period" for post FDP duties is routinely exceeded then the post (...)		

Response No.	28	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	CS-FTL-2 / 13.3		
NPA Text	Tables A and C apply (...) A - two or more flight crew - Acclimatised		



Comment	Only FLIGHT-Crew, where is the guidance for CABIN-Crew? Table should be applicable to Flight and Cabin Crew
Alternative Text	shall be replaced by Annex-6-Part-II, Table-C1 (page 80)
Response	Not Accepted
Details	Limits refer to the composition of the <i>Flight Crew</i> .
Resulting Text	N/A

Response No.	29	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	CS-FTL-2 / 13.3 Table B Two or more flight crew - Not Acclimatised		
NPA Text	Table B Two or more flight crew - Not Acclimatised		
Comment			
Alternative Text	shall be replaced by Annex-6-Part-II, Table-C2 (page 81)		
Response	Not Accepted		
Details	No reason for the proposed table was given.		
Resulting Text	N/A		

Response No.	30	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	CS-FTL-2 / 13.3 Table C		
NPA Text	Tables A and C apply (...)		
Comment	Table-C is missing		
Alternative Text			
Response	Accepted		
Details	This has been corrected.		
Resulting Text	Table C now in Document.		

Response No.	31	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Annex-F Aeroplane Variation 1.1.1		
NPA Text	The Variations are identified as Level 1 and 2, allowing for an increase in the planned FDP of 30 and 60 minutes respectively. They are intended to <b>allow flights from the UK and return, or a two-sector flight from or to the UK</b> , within a single extended FDP. Sector lengths over 7½ hours will continue to be factorised or will require an additional pilot as a flight crew member.		
Comment	It seems a COPY-PASTE-error from old CAP-371, but I suggests using Qatar instead of UK		
Alternative Text			
Response	Accepted		
Details	Text has been amended accordingly.		



Resulting Text	"The Variations are identified as Level 1 and 2, allowing for an increase in the planned FDP of 30 and 60 minutes respectively. They are intended to allow flights from Qatar and return, or a two-sector flight from or to Qatar, within a single extended FDP..."
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Response No.	32	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Annex F Aeroplane Variations 1 Standard Variations, Extended Single Flight Duty Period 1.1 Introduction 1.1.2		
NPA Text	(...) In this context, where a mix of Boeing 757 and 767 (...)		
Comment	Here we refer to "new AC types during 1980", where we should refer to A787/A777 and A350s instead		
Alternative Text			
Response	Accepted		
Details	Text has been revised accordingly		
Resulting Text	"In this context, where a mix of Boeing 777 and 787 aircraft is used and pilots are qualified on both, these two types are considered to comprise one fleet."		

Response No.	33	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Annex-F Aeroplane Variation Introduction		
NPA Text	Companies are invited to apply to incorporate any of the following variations: Standard Variations Levels 1 and 2  Florida 1 and 2		
Comment	Both Variation Samples "Florida 1 and 2" are missing from the draft		
Alternative Text	add them back in. Ref to CAP371 (2004)		
Response	Partially Accepted		
Details	Reference to Florida 1 and 2 has been removed as these variations were specific to the UK and may not be relevant for the time zone in Qatar.		
Resulting Text	"Companies are invited to apply to incorporate any of the following variations: Standard Variations Levels 1 and 2. Other variations may be considered based on an appropriate safety case."		

Response No.	34	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Publication date of the QCAR: [1/05/2021]		
NPA Text			
Comment	Due to OPR using IT systems applying regulations, a transition period of i.e. 6month after Regulation Effective date (similar DGR-competency based training) shall be granted, allowing correctly regulation implementation (system upgrades) and approval of "deviations"		

Alternative Text	N/A
Response	Accepted
Details	CS-FTL.2 will be applicable from 1 January 2022
Resulting Text	N/A

Response No.	35	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	6 Calculation of a Flying Duty Period		
NPA Text	6.1 The maximum FDP, in hours and fractions of hours, shall be in accordance with paragraph 13, Table A or B (2 or more flight crew, aeroplanes), Table C (single flight crew aeroplanes) or paragraph 23, Table D (helicopters). <b>The times extracted from the tables may be extended by use of in-flight relief, split duty and commander's discretion, under the terms of paragraphs 15, 16 and 18.</b> Where an aeroplane flight crew consists of two pilots only, any FDP involving a sector which is planned to exceed 7 hours must be calculated in accordance with the provisions of <b>paragraph 14.</b>		
Comment	After Page 156, which finishes with Para 13.4, here is no Para 15-17 all "genral scheme" sections 14-25 are missing. Only available in the Sample schemes with respective specifications		
Alternative Text	add them back in. Ref to CAP371 (2004)		
Response	Accepted		
Details	CS-FTL.2 has been amended to include the proposed text.		
Resulting Text	N/A		

Response No.	36	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	CS-FTL.2 Option-A - Annotation:		
NPA Text	omitting a paragraph - annotated with the symbol `⌘` - where the		
Comment	symbol `⌘` - issing in front of any respecetive paragraph		
Alternative Text	add them back in. Ref to CAP371 (2004)		
Response	Accepted		
Details	These will be added to the text where relevant.		
Resulting Text			

Response No.	37	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	Annex-A (Large Operator) Para 17.2		
NPA Text	17.2 The minimum rest period which must be taken before undertaking a flying duty period shall be: a) at least as long as the preceding duty period, or b) 12 hours, whichever is the greater		

Comment	The comparison sentence "Whichever is Greater" should be situated After the option b)
Alternative Text	17.2 The minimum rest period which must be taken before undertaking a flying duty period shall be: a) at least as long as the preceding duty period, or <b>b) 12 hours, whichever is the greater</b>
Response	Accepted
Details	Text has been amended accordingly.
Resulting Text	The minimum rest period which must be taken before undertaking a flying duty period shall be: a) at least as long as the preceding duty period, or b) 12 hours, whichever is the greater.

Response No.	38	Comment Originator(s)	External (Amiri Flight)
Affected Paragraph	CS-FTL.2 20 Reporting Exercise of Discretion		
NPA Text	20.1 Whenever a commander extends an FDP it shall be reported to (*) on a Discretion Report Form, in the format of (*). If the extension is greater than 2 hours, or discretion is exercised after any reduced rest period, then the company will submit the commander's written report, together with company comments, to the Authority, <b>within 14 days of the aircraft's return to base.</b>  20.2 Whenever a commander reduces a rest period, it shall be reported to (*) on a Discretion Report Form, in the format of (*). If the reduction is more than 1 hour, then the company will submit the commander's written report together with comments by the company to the Authority, <b>within 14 days of the aircraft's return to base.</b>		
Comment	This is in stark contradiction to ORO-FTL_.205 para (f) (5) which requires 28-days only		
Alternative Text	CS-FTL guidance shall be aligned with ORO-FTL as the umbrella rule		
Response	Accepted.		
Details	CS-FTL.2 aligned with ORO.FTL		
Resulting Text	N/A		

Response No.	39	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Article 2		
NPA Text	Definitions 'For the purposes of this regulation'		

Comment	'Aircraft' is used throughout the regulation and often in the singular tense. It is worth including under definitions, so it is clear 'aircraft' applies to all machines capable of flight.
Alternative Text	'Aircraft' means an aeroplane, helicopter, or other machine capable of flight
Response	Not Accepted
Details	Definition of Aircraft is the ICAO Annex 6 definition.
Resulting Text	N/A

Response No.	40	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Article 2		
NPA Text	Definitions 'For the purposes of this regulation'		
Comment	Rule for using uppercase and lowercase for the first word appears not to be consistent. e.g., (17) 'Category A' & (18) 'category B'		
Alternative Text	Review all and amend as appropriate.		
Response	Accepted		
Details	lowercase has been used throughout Article 2		
Resulting Text	Refer to Article 2		

Response No.	41	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex 1 Definitions, (17)		
NPA Text	'Category A' with respect to helicopters'		
Comment	The mark ` after A should be removed.		
Alternative Text	'Category A with respect to helicopters'		
Response	Accepted		
Details	The mark has been removed		
Resulting Text	'Category A with respect to helicopters'		

Response No.	42	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex 1 Definitions , (19)		
NPA Text	"Certification Specifications"		
Comment	Wrong use of quotation marks.		
Alternative Text	'Certification Specifications'		
Response	Accepted		
Details	Text has been amended accordingly		
Resulting Text	'Certification Specifications'		

Response No.	43	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex 1 Definitions , (23b)		
NPA Text	complex motor-powered aircraft'		

Comment	Quotation mark omitted before complex
Alternative Text	'complex motor-powered aircraft'
Response	Accepted
Details	Text has been amended accordingly
Resulting Text	'complex motor-powered aircraft'

Response No.	44	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Article 2, (96c)		
NPA Text	'point of no return'		
Comment	'point of no return' is commonly referred to as 'PNR', and propose including this under the definition.		
Alternative Text	'Point of no return (PNR)'		
Response	Not Accepted		
Details	Definition is aligned with ICAO Annex 6		
Resulting Text	N/A		

Response No.	45	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	ORO.GEN.310 Use of aircraft listed on an AOC for non-commercial operations and specialised operations		
NPA Text	(a)(2) by other operators, for non-commercial operations with motor-powered aircraft or for specialised operations performed in accordance with Annex VI (Part-NCC), Annex VII (Part-NCO) or Annex VIII (Part-SPO), provided that the aircraft is used for a continuous period not exceeding 30 days		
Comment	'...not exceeding 30 days' will potentially be very restrictive for GHC's NCC VVIP Operation. Proposed this is increased to '90 days' to provide greater flexibility in particularly the international tasks		
Alternative Text	'...not exceeding 90 days for intranational tasks'		
Response	Not Accepted		
Details	Any issues that an operator encounters can be dealt with on a case by case basis with the Authority		
Resulting Text	N/A		

Response No.	46	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	ORO.AOC.125 (a) Non-commercial operations of aircraft listed in the operations specifications by the holder of an AOC		
NPA Text	'.....such operations in detail in the operations manual'		
Comment	Typo for Manual		
Alternative Text	'.....such operations in detail in the operations manual'		
Response	Accepted		

Details	Text has been amended accordingly
Resulting Text	An AOC holder may conduct non-commercial operations in accordance with Annex VI (Part-NCC) or Annex VII (Part-NCO) with aircraft listed in the operations specifications of its AOC or in its operations manual, provided that the AOC holder describes such operations in detail in the operations manual, including the following:

Response No.	47	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex D – Helicopters 5.6		
NPA Text	<b>'Early Start Duty'</b> A duty is an Early Start Duty if it commences in the period 0500 to 0659 hours local time.		
Comment	GHC OMA 7.5.8 states that a duty is an early start duty if it commences in the period 0400 to 0559 hours local time.		
Alternative Text	GHC request for alleviation on this as the current approved FTL scheme suits best the GHC's early start operations to meet the Client demand		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	48	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex D: 7.3 Interrupted Rest		
NPA Text	"If, prior to the start of an FDP, a crew member's rest period is interrupted for operational reasons between 2300 and 0700 hours local time, the following shall apply:"		
Comment	GHC OMA 7.7.2.1 states '2200 and 0600' and slight variation on the regulation, but same length of window.		
Alternative Text	GHC request for alleviation on this as the current approved FTL scheme suits best the GHC's early start operations.		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	49	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex D: 12.1 Standby Duty		
NPA Text	"However, when standby is undertaken at home, or in suitable accommodation provided by the company, during the period 2200 to 0800 hours local time and a crew member is given 2 hours or less notice of a report time, the allowable FDP starts at the report time for the designated reporting place."		
Comment	The 2200 to 0800 is a 10 hour window and differs from OM-A 7.12.1. which states '1800-0600'; earlier and a 12 hour window.		
Alternative Text	GHC request for alleviation on this as the current approved FTL scheme suits best the GHC's early start operations.		

Response	Noted
Details	N/A
Resulting Text	N/A

Response No.	50	Comment Originator(s)	External (Gulf Helicopter)
Affected Paragraph	Annex D: 13 Maximum FDP-Helicopters		
NPA Text	Table at 13.3 provides Single pilot and Two Pilot limits.		
Comment	OM-A 7.20.3 and FTL 03-Maximum FDP Table was amended at the last NPA to reflect the same scheme, but still starts one hour earlier to accommodate the Clients' need for an early start.		
Alternative Text	GHC request for alleviation on this as the current approved FTL scheme suits best the GHC's early start operations.		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	51	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CS FTL.1.205 (c) Flight duty period (FDP) (c) Extension of FDP due to in-flight rest		
NPA Text	<p>- 'Class 2 rest facility' means a seat in an aircraft cabin that reclines at least 45° back angle to the vertical, has at least a pitch of 55 inches (137,5 cm), a seat width of at least 20 inches (50 cm) and provides leg and foot support. It is normally separated from passengers by at least a curtain to provide darkness and some sound mitigation, and is reasonably free from disturbance by passengers or crew members.c)</p> <p>Extension of FDP due to in-flight rest.</p> <p>- 'Class 3 rest facility' means a seat in an aircraft cabin or flight crew compartment that reclines at least 40° from the vertical, provides leg and foot support and is separated from passengers by at least a curtain to provide darkness and some sound mitigation, and is not adjacent to any seat occupied by passengers.</p>		
Comment	<p>The following text has been removed:</p> <p>— Alternatively an operator may use a seat in an aircraft cabin designated as First Class or Business Class without a curtain. Every effort shall be made to ensure that the seat is free from disturbance from other passengers as far as practical;</p> <p>Removal of the above provision has a severe impact on the existing QCAA approved FTL scheme of Qatar Airways; hence, it is requested to not omit this provision</p>		
Alternative Text			



	<p>CS FTL.1.205 (c) Flight duty period (FDP)</p> <p>(c) Extension of FDP due to in-flight rest</p> <p>- 'Class 2 rest facility' means a seat in an aircraft cabin that reclines at least 45° back angle to the vertical, has at least a pitch of 55 inches (137,5 cm), a seat width of at least 20 inches (50 cm) and provides leg and foot support. It is normally separated from passengers by at least a curtain to provide darkness and some sound mitigation, and is reasonably free from disturbance by passengers or crew members.c)</p> <p>Extension of FDP due to in-flight rest.</p> <p>— Alternatively an operator may use a seat in an aircraft cabin designated as First Class or Business Class without a curtain. Every effort shall be made to ensure that the seat is free from disturbance from other passengers as far as practical;</p> <p>- 'Class 3 rest facility' means a seat in an aircraft cabin or flight crew compartment that reclines at least 40° from the vertical, provides leg and foot support and is separated from passengers by at least a curtain to provide darkness and some sound mitigation, and is not adjacent to any seat occupied by passengers</p>
Response	Accepted
Details	Text has been amended.
Resulting Text	Note: Alternatively an operator may use a seat in an aircraft cabin designated as First Class or Business Class without a curtain. Every effort shall be made to ensure that the seat is free from disturbance from other passengers and as far as practical that the quality of rest is ensured

Response No.	52	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	GM1 ORO.FTL.105(17) Definitions		
NPA Text	A person on board an aircraft is either a crew member or a passenger. If a crew member is not a passenger on board an aircraft he/she should be considered as 'carrying out duties'. The crew member remains an operating crew member during in-flight rest. In-flight rest counts in full as FDP, and for the purpose of ORO.FTL.210.		
Comment	<p>It has been agreed with the QCAA that inflight rest should not count towards maximum flight time limitations. QR are already utilizing this provision. Which is approved in the OM-A.</p> <p>The lack of the above provision has a severe impact on the existing QCAA approved FTL scheme of Qatar Airways.</p>		
Alternative Text	A person on board an aircraft is either a crew member or a passenger. If a crew member is not a passenger on board an aircraft he/she should be considered as 'carrying out duties'. The crew member remains an operating crew member during in-flight rest. In-flight rest counts in full as FDP, and for the purpose of ORO.FTL.210 (a) & (c), but under FRM does not count as flight time towards ORO.FTL210(b).		
Response	Not Accepted		
Details	This deviation is subject to an individual flight time specification scheme.		
Resulting Text	N/A		

Response No.	53	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CC.GEN.015		



NPA Text	The application for a cabin crew certificate of competency shall be made in a form and manner established by the Authority.
Comment	More clarity needed from the QCAA with regards to the application process, as currently CCCC are being issued internally by QR.
Alternative Text	N/A
Response	Noted
Details	Currently all operators have been delegated the Authority to issue CCCC.
Resulting Text	N/A

Response No.	54	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CC.CCCC.105		
NPA Text	<p>The cabin crew certificate of competency shall be issued with unlimited duration and shall remain valid unless:</p> <p>(a) it is suspended or revoked by the Authority; or</p> <p>(b) its holder has not exercised the associated privileges during the preceding 60 months on at least one aircraft type.</p>		
Comment	<p>Currently, CCCC is issued with a one year validity period and is renewed annually on completion of Recurrent Training.</p> <p>Is it that CCCC will not have to be renewed after each Recurrent training and that the ones issued on completion of Initial training will have an unlimited validity (i.e. no validity date mentioned)?</p>		
Alternative Text	N/A		
Response	Noted		
Details	<p>The Operators process for issuing CCCC can continue. The requirement is that Cabin Crew shall complete recurrent training annually and is not linked to a renewal of the CCCC. A lack of recurrent training however, could be grounds for suspension or revocation of the CCCC.</p>		
Resulting Text	N/A		

Response No.	55	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	GM2 CAT.OP.MPA.155(b)		
NPA Text	<p>Adult travelling with an infant</p> <p>Information on brace position for adult with lap-held infant.</p> <p>Information on the use of the loop belt, in case of a lap-held infant.</p> <p>Information to fit own oxygen mask before fitting the infant's oxygen mask.</p> <p>Information on how to evacuate when carrying an infant:</p> <p>(a) On land, see EASA SIB 2013-06 on evacuation of infants on aircraft equipped with inflatable slides or hatch-type overwing exits jump on the slide; and</p> <p>(b) In case of ditching, how to fit and when to inflate infant flotation aid (e.g. life vest jacket,</p>		

	flotation device).
Comment	The additional requirement will be documented in the CSPM and covered during trainings, however, including the same in the Safety Information Card will not be feasible at this time due to the multiple fleets and existing stock of Safety Instructions Cards.
Alternative Text	N/A
Response	Noted
Details	N/A
Resulting Text	N/A

Response No.	56	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	ORO.CC Section 2		
NPA Text	SECTION 2 Additional requirements for non commercial complex air transport operations where applicable and commercial air transport operations		
Comment	The requirements are not aligned with ORO.CC.005 Scope (b) Section 2 specifying additional requirements only applicable to commercial air transport operations		
Alternative Text			
Response	Accepted		
Details	Text has been amended accordingly.		
Resulting Text	SECTION 2 Additional requirements for commercial air transport operations...		

Response No.	57	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CAT.GEN.MPA.170		
NPA Text	Alcohol and drugs Psychoactive Substances		
Comment	The definition of Psychoactive Substances already covers alcohol and drugs.		
Alternative Text	<del>Alcohol and drugs</del> Psychoactive Substances		
Response	Accepted		
Details	Text is amended accordingly		
Resulting Text	CAT.GEN.MPA.170 Psychoactive Substances		

Response No.	58	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	1. CAT.GEN.MPA.100 Crew responsibilities (c) (1) 2. NCC.GEN.105 Crew responsibilities (e) (2) 3. NCO.SPEC.115 Crew responsibilities (e) (2) 4. SPO.GEN.105 Crew responsibilities (e)(2) 1. GM1 NCC.GEN.105(e)(2) Crew responsibilities 2. GM1 SPO.GEN.105(e)(2) Crew member responsibilities		
NPA Text	The crew member shall not perform duties on an aircraft: when under the influence of psychoactive substances or alcohol or when unfit due to injury, fatigue, medication, sickness or other similar causes; GENERAL		

	A crew member must not perform duties on board an aircraft when under the influence of psychoactive substances or alcohol or when unfit due to injury, fatigue, medication, sickness or other similar causes. This should be understood as including the following:...
Comment	The definition of Psychoactive Substances already covers alcohol and drugs.
Alternative Text	(c) The crew member shall not perform duties on an aircraft: (1) when under the influence of psychoactive substances <del>or alcohol</del> or when unfit due to injury, fatigue, medication, sickness or other similar causes; GENERAL A crew member must not perform duties on board an aircraft when under the influence of psychoactive substances <del>or alcohol</del> or when unfit due to injury, fatigue, medication, sickness or other similar causes. This should be understood as including the following:...
Response	Accepted
Details	Text is amended accordingly
Resulting Text	N/A

Response No.	59	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	Appendix V to Annex II (Part-ARO) SECTION 3 Additional Organisational Requirements ORO.GEN.310 (c) CAT.GEN.MPA.170 Alcohol and drugs Psychoactive Substances (d)		
NPA Text	8. Competent authority: (e) Item 9: If the authority is the issuing body, the term "competent authority" and official seal, stamp or logo shall be entered. (c) The AOC holder shall submit to the competent authority the procedure referred to in point (b) for prior approval. (d) In case of a confirmed positive test result, the operator shall inform its competent authority and the authority responsible for the personnel concerned, such as a medical assessor of the licensing authority.		
Comment	The competent authority for the civil aviation in the State of Qatar is the "Authority"/QCAA. The regulatory references in the column for Affected NPA paragraph are examples rather than a list.		
Alternative Text	8. <del>Competent a</del> Authority: (e) Item 9: If the authority is the issuing body, the term " <del>competent a</del> Authority" and official seal, stamp or logo shall be entered. (c) The AOC holder shall submit to the <del>competent a</del> Authority the procedure referred to in point (b) for prior approval. (d) In case of a confirmed positive test result, the operator shall inform <del>its the competent a</del> Authority and the authority responsible for the personnel concerned, such as a medical assessor of the licensing authority.		

Response	Partially Accepted
Details	Incorrect references to 'competent authority' where QCAA is the competent authority, have been amended.
Resulting Text	

Response No.	60	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	SUBPART A GENERAL REQUIREMENTS SPA.GEN.100 Competent Authority AMC1 ORO.AOC.110(c) Leasing agreement AMC2 ORO.AOC.115(b) Code-share agreements		
NPA Text	<p>(a) The competent authority for issuing a specific approval shall be:</p> <p>(1) for the commercial operator, the authority of the State in which the operator has its principal place of business;</p> <p>(2) for the non-commercial operator, the authority of the State in which the operator has its principal place of business, is established or is residing.</p> <p>(b) Notwithstanding point (a)(2), for the non-commercial operator using aircraft registered in a third country, the applicable requirements under this Annex for the approval of the following operations shall not apply if those approvals are issued by a third-country State of Registry:</p> <p>(1) performance-based navigation (PBN);</p> <p>(2) minimum operational performance specifications (MNPS);</p> <p>(d) for continuing airworthiness management of the third country operator, QCAR 1003/2006 as amended Part-M Subpart-B, Subpart-C and Subpart-G, excluding M.A.707, and M.A.710;</p> <p>(b) The use of a third party provider for the initial audit or the monitoring of continuous compliance of the third country code-share operator does not exempt the Qatari operator from its responsibility under ORO.AOC.115.</p>		
Comment	Consider defining third country and foreign when identifying authorities, operators and aircraft for more clarity. The regulatory references in the column for Affected NPA paragraph are examples rather than a list.		
Alternative Text			
Response	Partially accepted		
Details	References to third country have been amended to foreign country.		
Resulting Text	N/A		

Response No.	61	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	<p>AMC1 ORO.GEN.200(a)(48) Management system - Rescue And Fire Fighting Services (RFFS) Levels</p> <p>GM2 CAT.POL.A.310 Take-off obstacle clearance - multi-engined aeroplanes</p> <p>AMC1 CAT.POL.H.205(e) Take-off</p> <p>GM1 CAT.POL.H.225(a)(6) Helicopter operations to/from a public interest site CHAPTER 3 Performance class 2</p> <p>GM to Section 2, Chapter 3 performance class 2</p> <p>AMC3 CAT.IDE.A.190 Flight data recorder</p> <p>GM2 SPA.SET-IMC.105(d)(2) SET-IMC operations approval</p>		

	GM1 SPO.IDE.H.198 Survival suits - complex motor-powered helicopters
NPA Text	
Comment	Complete requirements are unreadable due to formatting issues.
Alternative Text	
Response	Accepted
Details	Formatting is corrected.
Resulting Text	

Response No.	62	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CAT.POL.A.220		
NPA Text	(a).... <del>unless it complies with</del> (b) to (f) are complied with.		
Comment	Do not remove "unless".		
Alternative Text	(a).... <del>unless it complies with</del> (b) to (f) are complied with.		
Response	Accepted		
Details	Text has been amended accordingly		
Resulting Text	An aeroplane that has three or more engines shall not be away from an aerodrome at which the requirements of CAT.POL.A.230 or CAT.POL.A.235(a) for the expected landing mass are met accordingly, at any point along the intended track for more than 90 minutes, with all engines operating at cruising power or thrust, as appropriate, at standard temperature in still air, unless (b) to (f) are complied with.		

Response No.	63	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	GEN.IDE.015 Data link recorders communications		
NPA Text	All aeroplanes for which the individual certificate of airworthiness was first issued before 1 January 2016, that are required to carry a CVR and are modified on or after 1 January 2016 to use any of the data link communications, shall record the data link communications messages on a crash-protected flight recorder, unless the installed data link communications equipment is compliant with a type certificate issued or aircraft modification first approved prior to 1 January 2016		
Comment	to define the timeline for compliance as per attached IATA ISM Edition 13 (Temporary Revision 2021-1) i.e. 1 September 2023.		
Alternative Text	N/A		
Response	Noted		
Details	GEN.IDE.015 will be removed to avoid conflict with CAT.IDE.A.195 Data Link recording. A Rulemaking task will be established by the QCAA to address this issue.		
Resulting Text	GEN.IDE.015 Deleted.		

Response No.	64	Comment Originator(s)	External (Qatar Airways)
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Affected Paragraph	CAT.IDE.A.155 Airborne collision avoidance system (ACAS)
NPA Text	Turbine-powered aeroplanes with an MCTOM of more than 5 700 kg or an MOPSC of more than 19, shall be equipped with ACAS II
Comment	Mandatory ACAS II / TCAS II Version 7.1 requirement is deleted. Clarification is required whether ACAS II with standard version 7.1 should still mentioned in this paragraph since it was mandated by EASA.
Alternative Text	N/A
Response	Not Accepted
Details	Versions of ACAS II can be updated and would then require a change in the regulation every time the version is updated.
Resulting Text	N/A

Response No.	65	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CAT.IDE.A.185 Cockpit voice recorder		
NPA Text	(b) Until 31 December 2018, the CVR shall be capable of retaining the data recorded during at least: <ul style="list-style-type: none"> <li>(1) the preceding 2 hours in the case of aeroplanes referred to in (a)(1) when the individual CofA has been issued on or after 1 April 1998</li> <li>(2) the preceding 30 minutes for aeroplanes referred to in (a)(1) when the individual CofA has been issued before 1 April 1998; or</li> <li>(3) (3) the preceding 30 minutes, in the case of aeroplanes referred to in (a)(2).</li> </ul>		
Comment	Item (b) "number (3)" mentioned twice.		
Alternative Text	N/A		
Response	Accepted		
Details	The text has been corrected		
Resulting Text	(b) Until 31 December 2018, the CVR shall be capable of retaining the data recorded during at least: <ul style="list-style-type: none"> <li>(1) the preceding 2 hours in the case of aeroplanes referred to in (a)(1) when the individual CofA has been issued on or after 1 April 1998</li> <li>(2) the preceding 30 minutes for aeroplanes referred to in (a)(1) when the individual CofA has been issued before 1 April 1998; or</li> <li>(3) the preceding 30 minutes, in the case of aeroplanes referred to in (a)(2).</li> </ul>		

Response No.	66	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CAT.IDE.A.190 Flight data recorder		

NPA Text	<p>(a) The following aeroplanes shall be equipped with a flight data recorder (FDR) that uses a digital method of recording and storing data and for which a method of readily retrieving that data from the storage medium is available:</p> <ul style="list-style-type: none"> <li>(1) aeroplanes with an MCTOM of more than 5 700 kg and first issued with an individual CofA on or after 1 June 1990;</li> <li>(2) turbine-engined aeroplanes with an MCTOM of more than 5 700 kg and first issued with an individual CofA on or after 1 June 1990; and</li> <li>(3) multi-engined turbine-powered aeroplanes with an MCTOM of 5 700 kg or less with an MOPSC of more than nine and first issued with an individual CofA on or after 1 April 1998.</li> </ul> <p>(b) The FDR shall record:</p> <ul style="list-style-type: none"> <li>(1) time, altitude, airspeed, normal acceleration and heading and be capable of retaining the data recorded during at least the preceding 25 hours for aeroplanes referred to in (a)(2) with an MCTOM of less than 27 000 kg;</li> <li>(2) the parameters required to determine accurately the aeroplane flight path, speed, attitude, engine power and configuration of lift and drag devices and be capable of retaining the data recorded during at least the preceding 25 hours, for aeroplanes referred to in (a)(1) with an MCTOM of less than 27000 kg and first issued with an individual CofA before 1 January 2016; .</li> <li>(3) the parameters required to determine accurately the aeroplane flight path, speed, attitude, engine power, configuration and operation and be capable of retaining the data recorded during at least the preceding 25 hours, for aeroplanes referred to in (a)(1) and (a)(2) with an MCTOM of over 27 000 kg and first issued with an individual CofA before 1 January 2016;</li> <li>(4) the parameters required to determine accurately the aeroplane flight path, speed, attitude, engine power and configuration of lift and drag devices and be capable of retaining the data recorded during at least the preceding 10 hours, in the case of aeroplanes referred to in (a)(3) and first issued with an individual CofA before 1 January 2016; or</li> <li>(5) the parameters required to determine accurately the aeroplane flight path, speed, attitude, engine power, configuration and operation and be capable of retaining the data recorded during at least the preceding 25 hours, for aeroplanes referred to in (a)(1) and (a)(3) and first issued with an individual CofA on or after 1 January 2016.</li> </ul>
Comment	There is contradictory between item (a) (1) (2) and (b) (1) thru (5) in term of MCTOM & CofA. Recommended to simplify.
Alternative Text	N/A
Response	Not Accepted
Details	Contradiction not identified
Resulting Text	N/A



Response No.	67	Comment Originator(s)	External (Qatar Airways)
Affected Paragraph	CAT.IDE.A.195 Data link recording		
NPA Text	(a) Aeroplanes first issued with an individual CofA on or after 8 April 2014 that have the capability to operate data link communications and are required to be equipped with a CVR, shall record on a recorder, where applicable:		
Comment	the requirements for Data link recording in this item is required for airplane with CofA on or after 8 April 2014 however in Item "GEN.IDE.015 Data link recorders communications" for airplane with CofA was first issued before 1 January 2016. Recommended to harmonize both items for datalink communication recording and define the timeline for compliance as per attached IATA ISM Edition 13 (Temporary Revision 2021-1) i.e. 1 September 2023.		
Alternative Text	N/A		
Response	Noted		
Details	See Response No. 63		
Resulting Text	N/A		

Response No.	68	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	It is promulgated that Non-Commercial Operations with complex motor-powered aeroplanes shall comply as regards Flight Time Limitations, with the applicable requirements specified in CS - FTL 2 which has been placed as Annex to the regulation ORO.FTL. Further Annex B of CS-FTL.2 - 'Air Taxi / Sole Use Charter' supplemented with Annex F is applicable to Amiri Flight. This is however observed that the Certification Specification does not address all complexities that are associated with size and nature of the Amiri Flight Operations.		
Alternative Text			
Response	Partially Accepted		
Details	Annex A has now been included as part of the NPA and should address this issue.		
Resulting Text			

Response No.	69	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	Annex B CS-FTL.2 is based on context that Flights are operated confined to an area within which the local time does not vary by more than two (2) hours, and the utilised aircraft is one which contains nineteen (19) or less passenger seats. It is therefore that FDP guidelines available here are limited for Acclimatised Crew.		



	Further Annex F that provides the Aeroplane variation is specific in guidance to FDP extension of 30 min / 60 min. The context is therefore in offset to our business and operational requirements.
Alternative Text	
Response	Partially Accepted
Details	Annex A has now been included as part of the NPA and should address this issue.
Resulting Text	

Response No.	70	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	Annex B CS-FTL.2 further bases the content on premise that the application of inflight relief to extend an FDP is not used. Extension of FDP with In Flight rest utilising appropriate rest facilities is one essential requirement to meet our business objective.		
Alternative Text			
Response	Partially Accepted		
Details	Annex A has now been included as part of the NPA and should address this issue.		
Resulting Text			

Response No.	71	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	CS-FTL.2 Section A para 1.1 requires that the operator shall have a scheme for the regulation of flight times of Crew. The scheme must be approved by the Authority. ORO.FTL.125 (b) however requires that the Authority shall approve such scheme only from CAT operators. This contradicts.		
Alternative Text			
Response	Accepted		
Details	NCC Schemes do not need to be approved.		
Resulting Text	QCAR 002 of 2016 (Air Operations), as amended, requires that the operator of an aircraft to which the Regulation applies shall have a scheme for the regulation of flight times of crew. The schemes for commercial air transport must be approved by the Authority and included in the Company Operations Manual, or when an Operations Manual is not required by the Regulation, incorporated in a separate document. The Operations Manual, or separate document, shall be readily available to every person employed by the operator as a member of an aircraft crew.		

Response No.	72	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	CS-FTL.2 para 3.1 requires that 'Operators must establish minimum periods of notification of duty for operating crew, or where this is not practicable due to the nature of the operation, must establish in advance minimum periods of notification of days off, during which a Crew Member will not be required for any duties. To the nature and specifics for the Amiri Flight VVIP operations, this may require a dispensation.		
Alternative Text	N/A		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	73	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	Annex B CS-FTL.2 para 10.1 'Delayed Reporting Time in a Single FDP' requires that when a Crew Member is informed of a delay to the reporting time, due to a changed schedule, the maximum FDP allowed shall be based on the original report time. The FDP shall start at the actual report time, if the delay is less than four (4) hours. Our business model of Non Schedule operations for the VVIP passengers often meets such complexities. A dispensation may therefore be necessary with alternative mitigation strategy to meet compliance to this requirement.		
Alternative Text	N/A		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	74	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	Annex B CS-FTL.2 para 12 'Standby Duty' does not address the requirements as applicable for the NCC VVIP operations and a dispensation with alternative means of compliance may be necessary.		
Alternative Text	N/A		
Response	Noted		
Details	N/A		
Resulting Text	N/A		

Response No.	75	Comment Originator(s)	Amiri Flight
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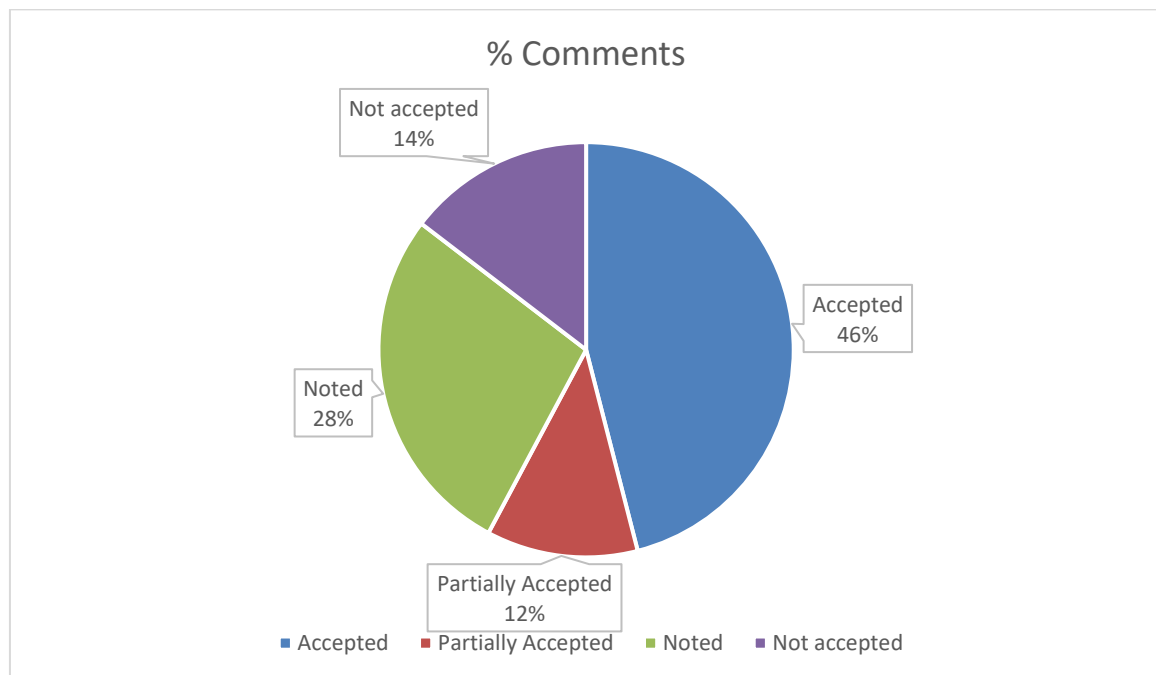
Affected Paragraph	
NPA Text	
Comment	Fatigue Risk Management requirements as in ORO.FTL.120 requires that "When FRM is required by this Subpart or an applicable certification specification; the operator shall establish, implement and maintain a FRM as an integral part of its management system." The CS-FTL.2 for NCC operations provides no guidance for the FRMS, neither part ORO AMCs / GMs have guidance on this subject for NCC Operators. To the nature and complexities of Amiri Flight operations, a risk based approach to meet situations where hard rules may not sufficiently provide the required flexibility is an utmost requirement.
Alternative Text	N/A
Response	Accepted
Details	Reference to ORO.FTL.120 has been included in CS-FTL.2
Resulting Text	Section A 1.5 - If an operator wishes to implement Fatigue Risk Management (FRM) it shall follow the criteria as per ORO.FTL.120 and associated Acceptable Means of Compliance.

Response No.	76	Comment Originator(s)	Amiri Flight
Affected Paragraph			
NPA Text			
Comment	Effective date of 01 May 2021 does not provide enough time space for Electronic Systems / Software changes and testing, should the existing approved FTL policy undergoes significant changes.		
Alternative Text	N/A		
Response	Accepted		
Details	Applicability date is 01 January 2022		
Resulting Text	N/A		

## Statistics

- Duration of consultation: 96 days;
- Received comments: (76);
- Commenters: (4)
  - QCAA Internal (16)
  - Gulf Helicopters (12)
  - Amiri Flight (31); and
  - Qatar Airways (17)

The following pie chart depicts the portion comments accepted, partially accepted, noted or not accepted:



In other words, around (85.53)% of the received comments have been addressed positively:

Comments	Accepted	Partially Accepted	Noted	Not accepted
No.	35	9	21	11
%	46	11.8	27.6	14.6

## 2.2. Overview of the impact of accepted comments

The changes triggered by these comments have enhanced the proposed amended regulation with numerous gaps identified and resolved. This work continues to highlight the strengthening of the QCAA's relationship with industry.