

22 August 2014

By Electronic Transmission

Mr Jan Goosen
Standard Development and Quality Assurance Branch
Civil Aviation Safety Authority
GPO Box 2005
CANBERRA ACT 2601

Email: nprm1320as@casa.gov.au

Our Ref: S05-0019

Dear Mr Goosen,

Re: NPRM 1320AS/Draft AC 91.U-II-1 – Navigation Authorisations

The Australian and International Pilots' Association (AIPA) is grateful for the opportunity to review and comment on CASA's NPRM 1320AS/Draft AC 91.U-II-1 regarding Navigation Authorisations.

AIPA takes an active stake in the Australian aviation industry, participating in inquiries in the Australian aviation sector and contributing members to various industry forums. AIPA is also an active member of the global pilot body, the International Federation of Airline Pilots' Association (IFALPA), which represents over 100,000 airline pilots internationally.

AIPA has recently reviewed the NPRM and is, in general, supportive of CASA's decision to align navigation authorisations with the ICAO PBN Manual (Doc 9613) and to create provisions/criteria for Advanced PBN (which will come into use within the next 5 years), in addition to trying to rationalise the requirements for navigation authorisations for operators with suitably equipped aircraft and trained aircrew.

Only certain types of PBN operations will require specific authorisation/approval from CASA as the others will have been "deemed" to be authorised as a result of their fitment. (The ASTRA PBNWG was also in favour of these amendments.) This "deemed" provision will also apply to suitably equipped aircraft operating oceanic/remote continental areas.

AIPA notes that the proposed changes cover the usage of "out of date" databases (which is in line with Doc 9613) though Doc 9613 does include the caveats for such usage. There

will be a change to the MEL requirement from 72 hours to 3 days (i.e. to a Category B entry). Such categories can be granted a Rectification Interval Extension, but it is not clear whether this will apply in this case.

AIPA supports the approval for Integrated on board avionics equipment (meeting the criteria of TSO 145) as an Acceptable Means of Compliance for GNSS usage.

AIPA also supports the re-classification of some routes, which are now are classed as RNAV routes, will be re-classified as RNAV 5 and RNAV 1 in order to specify a performance standard without imposing “an additional burden on the operator.

AIPA notes that operating standards will require the aircraft to maintain the route centreline, but is not sure how this fits in with the Strategic Lateral Offset Procedure.

Should you have any enquiries or wish to discuss this further, please do not hesitate to contact us on 02 8307 7777 or at safety.technical@aipa.org.au.

Yours sincerely,



Captain Shane Loney
Vice President /Safety & Technical Director

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