



Australian Government

Civil Aviation Safety Authority

Notice of Final Change (NFC)

**(Including Consolidated Summary of Responses and
Disposition of Comments to NPC 139/03)**

Proposed Amendments to Manual of Standards (MOS) Part 139 – Aerodromes

Chapter 2 – Introduction, and Chapter 6 – Physical Characteristics

Readers should note that this Notice of Final Change (NFC) contains the consolidated summary of responses, CASA's comments and disposition of comments to NPC 139/03. The NFC also outlines CASA's agreed policy and intended changes and finalises the public consultation process in respect of the NPC.

Only under extreme or unusual circumstances will CASA consider views or arguments opposing the views expressed in this NFC.

Any member of the public having views or arguments to support an appeal against the decisions documented in this NFC may ask/request CASA to consider such an appeal.

Issued as part of the process of public consultation
by CASA's Standards Administration and Support Branch

Document NFC 139/03 –January 2008

Foreword

On 24 August 2007 the Civil Aviation Safety Authority (CASA) released for public comment a Notice of Proposed Change – NPC 139/03, titled '*Proposed Amendments to Manual of Standards (MOS) Part 139 – Aerodromes*'. The NPC proposed to introduce information on the aerodrome reference code and aeroplane characteristics for two new aeroplane types; the Airbus A380 and the Dash 8 Q400 and to amend the standards for runway width and taxiway width to allow the Airbus A380 aircraft, a code F aeroplane, to operate on existing code E aerodromes with 45m wide runways and 23m wide taxiways without the need for an aerodrome exemption, conditional on the provision of specific runway and taxiway shoulder treatments. The period for public comment on the proposals contained in the NPC closed on 21 September 2007.

A short consultation period was sought, subject to general agreement to the proposed changes, to try to get the changes to the standards made before the A380 commenced commercial operations into Australian airports October 2007. To avoid the possibility of the changes not being made before operations began, and to give airlines assurance of the preparedness of the Australian airports, an aerodrome exemption was approved by CASA on 11 September 2007 for a period of 12 months.

At the closing date for comments CASA had received sixteen (16) responses to the NPC. The majority of the respondents supported the proposed changes to the standards with many of those also suggesting the wording of the standards proposed in the NPC should be changed to better clarify the intent of the standards.

This Notice of Final Change (NFC):

- provides a background of the consultation undertaken;
- presents the submissions made in response to NPC 139/03;
- provides CASA's analysis of the responses and the disposition of the final documentation;
- discusses the impact and gives an explanation of the changes; and
- itemises the final changes to the Manual of Standards (MOS) Part 139 – Aerodromes.

I thank those people who took the time to respond to NPC 139/03. On the basis of the support received CASA will proceed with the making of the changes as proposed in NPC 139/03.



Peter Cromarty
General Manager
Airspace and Aerodrome Regulation Group

25 January 2008



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Final Changes Made

1. Background

1.1 Notice of Proposed Change (NPC 139/03), containing proposed changes to Chapter 2 and Chapter 6 of the Manual of Standards (MOS) Part 139 – Aerodromes, was formally released for public comment on 24 August 2007.

1.2 The introduction of the Airbus A380, a code F aeroplane, means that many of the world's current code E aerodromes, designed for the likes of the Boeing B747 family of aircraft, need to be upgraded if they are to meet the physical characteristics required by code F standards. Where it is considered too costly or disruptive to aerodrome operations to upgrade the existing facilities to meet the full code F provisions, the NPC sought to amend the current aerodrome standards for runway width and taxiway width to allow the A380 aircraft to operate on existing code E aerodromes with 45m wide runways and 23m wide taxiways without the need for an aerodrome exemption. This was conditional on the provision of specific runway and taxiway shoulder treatments.

1.3 The NPC also proposed introducing information on the aerodrome reference code and aeroplane characteristics for the A380 and the Bombardier Dash 8 Q400.

2. Purpose

2.1 The purpose of this Notice of Final Change (NFC) is to provide details of comments received on the NPC 139/03, to provide CASA's response to those comments, and to list the final changes to be made to Chapter 2 and Chapter 6 of MOS Part 139 – Aerodromes, resulting from the NPC consultation process.

3. Analysis of Comments

3.1 At the closing date for comments CASA received sixteen (16) submissions to the NPC. The breakdown of submissions was:

- five from aerodrome operators;
- four from major airline pilots;
- four from private non airline pilots;
- two from aerodrome engineering consultants; and
- one from CASA,



Analysis of comments on the proposals to amend MOS Part 139 Chapter 2 Section 2.1.6 – Aerodrome Reference Codes and Aeroplane Characteristics

3.2 Thirteen of the total respondents provided a submission to this change. Twelve of those accepted the change and one accepted the changes but suggested additional new aircraft types be included in Table 2.1.

3.3 The summary of the disposition of responses to this proposal is as follows:

Disposition of Responses	No. of Respondents
Acceptable without change	12
Acceptable but would be improved if changed	1
Not acceptable but would be acceptable if changed	0
Not acceptable under any circumstances	0
Not stated	3
	Total = 16

Analysis of comments on the proposals to amend MOS Part 139 Chapter 6 Section 6.2 – Runways and Section 6.3 – Taxiways

3.4 The majority of respondents agreed with the proposed changes but many suggested changing the wording used in the final change.

3.5 The summary of the disposition of responses to this proposal is as follows:

Disposition of Responses	No. of Respondents
Acceptable without change	5
Acceptable but would be improved if changed	7
Not acceptable but would be acceptable if changed	0
Not acceptable under any circumstances	2
Not stated	2
	Total = 16

Respondents

3.6 The list of respondents who consented to having their names published are:

Organisations

Mr Ken Keech – representing Australian Airports Association

Mr Ian Whitmore – representing Qantas Ground Support

Capt Ian Woods – representing Australian and International Pilots Association



Individuals

Mr Peter Chapman
Mr Stephen Emery
Mr Robert McDonald
Mr Gregory Parnell

4. Conclusion and Impact of Changes

4.1 All of the comments received have been evaluated by CASA. The comments received together with the CASA response and disposition action are presented in **Annex B** to this NFC.

4.2 In view of the general agreement to the changes, CASA will now proceed with making the changes to introduce the new aeroplane types in Chapter 2, Table 2.1 and the aerodrome standards proposed in the NPC to allow existing code E runways and taxiways together with shoulder enhancements to be used for regular operations by the A380 aircraft.

4.3 CASA has decided to take up the suggestion from one respondent and also included detail of several additional aeroplanes to those already proposed in the NPC, currently operating in Australia, which are presently not included in MOS Part 139, Chapter 2. These include: Airbus A340-500/600; Boeing B777-300 and Embraer E170/190.

4.4 See **Annex A** to this NFC for the final changes to Chapter 2 of MOS Part 139 – Aerodromes.

4.5 See **Annex A** to this NFC for the final changes to Chapter 6 of MOS-Part 139 – Aerodromes.

4.6 CASA aerodromes specialist area has prepared a paper in support of the CASA position taken in developing NPC 139/03. This paper also provides a response to the respondents who rejected the proposal put forward by CASA in NPC 139/03 on the grounds that it is unsafe to allow A380 operations at aerodromes with other than code F standard aerodrome infrastructure.

4.7 See **Annex C** to this NFC for the CASA discussion paper on A380 operations at existing Australian Airports.



5. Implementation and Review

5.1 The amendments to MOS-Part 139 will be issued under a CASA Miscellaneous Legislative Instrument signed by the Director of Aviation Safety and Chief Executive Officer. The instrument will be posted to the CASA Website at <http://casa.gov.au/avreg/rules/index.htm>. The amendment/miscellaneous legislative instrument will be announced on the CASA website at <http://casa.gov.au/avreg/rules/changes/index.htm> and subscribers to the 'Recent legislative changes' site will be notified by Email. The amendments will be effective from the date the instrument was signed.

5.2 Once the amendments have been approved and issued under the CASA Miscellaneous Legislative Instrument, the amendments to the MOS-Part 139 master 'on-line' and the MOS 'complete manual' versions will be updated on the CASA Website at <http://casa.gov.au/avreg/rules/1998casr/139/index.htm>. The amendment/revised MOS will be announced on the CASA website at <http://casa.gov.au/avreg/rules/changes/index.htm> and subscribers to the 'Recent legislative changes' site will be notified by Email.

Future change proposals

5.3 It is expected that the standards contained in the MOS will change from time to time to meet identified safety needs, technological changes, and changes in international standards and practices. Therefore, the MOS will be subject to ongoing monitoring, review and, as necessary, amendment.

5.4 Anyone may submit proposals/suggestions to change a MOS. See http://rrp.casa.gov.au/moreinfo/suggest_rule.asp for guidance on how to submit proposals or suggestions for change.

5.5 Suggestions or proposals to change the MOS may be submitted to CASA by either:

- *emailing* direct to the Aviation Safety Standards Division at review@casa.gov.au; or
- *faxing* the suggestion/proposal to freefax 1800 653 897; or
- *mailing* the suggestion or proposal to:

Head, Regulatory Development Branch
CASA Planning and Governance Office
Reply Paid 2005
CANBERRA ACT 2601

Note: People submitting a suggestion or proposal may discuss their suggestions/proposals with a CASA standards/technical specialist prior to submitting their proposal, by calling 131 757 and asking for the appropriate technical area or specialist.

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Proposed Amendments to Manual of Standards (MOS) Part 139 – Aerodromes

Document NFC 139/03

Copies of this Notice of Final Change NFC 139/03 can be obtained by one of the following means from:

Regulatory Documentation Coordinator

Post (no stamp required): Reply Paid 2005
Standards Administration & Support Branch
Civil Aviation Safety Authority
Canberra ACT 2601, Australia

E-mail [Enter email address]

Fax 1800 653 897 (free call)

international +612 6217 1691

Additional information is available from:

Frank Leonardi, Project Manager

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