



Proposed Comments on the NPA 2016-12 on the Transposition of provisions on EFB from ICAO Annex 6

3.1.2 Annex II (Part-ARO)

Proposed entry in the OPSSPECS by the NPA:

Use of type B EFB applications	<input type="checkbox"/>	<input type="checkbox"/>	23	
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23. Insertion of the list of type B EFB applications together with the reference of the EFB hardware.
Either this list is contained in the operations specifications or in the operations manual. In the latter case, the related operations specifications must make a reference to the related page in the operations manual.

To be replaced by:

EFB	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Portable EFB – Type A / B Installed EFB – Type A / B	Type A or Type B only Acc. application
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Note: Insertion of the list of type B applications. Either the list is contained on the operations specification or in the OM. In the latter case, the related operations specifications must make a reference to the related page in the operations manual.

Reason: The EFB hardware is subject to several requirements in order to be approved by the NAA and therefore is by itself subject as an OPSSPEC.



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Safe Operation:

The following sentence is used several times in the proposed NPA:

- Explanatory Note – 2.4.3 and 2.4.4
- **CAT.GEN.MPA.141 Use of electronic flight bags (EFBs)**
(b).....
- **SPA.EFB.100 Use of electronic flight bags (EFBs) — operational approval**
(a).....
- **NCC.GEN.131 Use of electronic flight bags (EFBs)**
(b).....
- **SPO.GEN.131 Use of electronic flight bags (EFBs)**
(b).....
- APPLICATION CLASSIFICATION
(b) Type B application

Type B applications are EFB applications which may have an adverse effect on the safe operation of an aircraft.

An operator shall only use an EFB application which may have an adverse effect on the safe operation of an aircraft if the operator has been granted an approval by the competent authority for such use.

This formulation is misleading and implies that an NAA is approving an application that has an adverse effect on the safe operation.

Proposal for changed wording:

An operator shall only use an EFB application which may have an adverse effect on the operation of an aircraft if the operator has been granted an approval by the competent authority for such use.

➔ Removal of the word “safe”

Note: EFB functions to be used for the safe operation of aircraft are considered to be those whose failure, malfunction or misuse would have an adverse effect on the safety of flight operations (e.g. increase in flight crew workload during critical phases of flight, reduction in functional capabilities or safety margins, etc.).

This explanation is taken from the ICAO Doc 10020 Chapter 6.1.3 and is clarifying the term of “safe operation”.

On behalf of the SWISS FOCA

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