

EASA**Comment Response Tool**

Title	Part-NCC and Part-NCO
NPA Number	NPA 2009-02b (Part-NCC and Part-NCO)

Swiss glacier pilots association (Jean-Louis (Hans) Fuchs, h.fuchs@pilatushotel.ch) has placed **1** reactions on this NPA:

NPA Page(s)	Reaction to	Reaction	Attachments
0	(general reactions)	<p>NCO.OP.195 USE OF SUPPLEMENTAL OXYGEN AND NCO.IDE.A.155 SUPPLEMENTAL OXYGEN – NON-PRESSURISED AEROPLANES</p> <p>Our long-standing experience in flying at high altitudes shows that oxygen requirements vary considerably with environment, acclimatization and individual physiology. - Anyway, in over 50 years of alpine flying there is not a single incident or even accident between 10'000 and 13'000 feet in which a lack of oxygen is a contributing factor what so ever. - The pilot in command of an NCO operation with no or few passengers is able to take such factors into account in an overall risk assessment in a way that may not be possible for CAT or NCC operations. An altitude limitation (or worse, time limitation at altitude) may cause the pilot in command to make suboptimal in-flight safety management decisions.</p> <p>The Swiss Glacier Pilots Association reviewed all available evidence and</p>	

came to the conclusion that there is no evidence suggesting that such an implementing rule would enhance safety in practice and would if anything reduce safety potentially.

As we face an overwhelming opposition to the proposed oxygen rule by the majority of our pilots, we fear that a such, not supported and against the conviction imposed rule, would compromise other more funded ESAS safety regulations. A general EASA weariness amongst the pilots has to be avoided.

Therefore we ask to completely abolish all oxygen requirements between 10'000 and 13'000 feet. For pressure altitudes above 13'000 feet we think a proposal for an AMC suits better our needs.