



AOPA NAMIBIA

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

The Interim Executive Director
Namibia Civil Aviation Authority
Rudolph Herzog Street
WINDHOEK
ATTENTION: Mr. Ericsson Nengola

13th April 2021

Dear Mr. Nengola,

Your letter (signed 11th April 2022) to the AOPA CEO re: Invitation to a working session on the 2018 Amendments to NAMCARS and NAMCATS – AH (permits of category D & E aerodromes, subpart 5)

Thank you for your letter of above reference.

The board of AOPA Namibia instructed the AOPA Technical Sub-Committee (TSC) on Aerodromes and Safety to recommend a way forward on Part 139 (as applied to D&E aerodromes). Having received recommendations from our TSC, we are in a position to advise you of AOPA's decision on Part 139 as well as respond to your invitation to attend the working session on the 27th April.

AOPA Namibia shall draft a new set of proposed regulations pertaining to Part 139, as applicable to D&E aerodromes as a discussion document. We would like to present our document to the NCAA at this working session.

We hereby decline the invitation from the NCAA to nominate ONLY one or two candidates to attend the working session on the 27th April. However, we would welcome the opportunity to attend the working session on condition that:

- The entire Technical Sub Committee of AOPA (Aerodromes and Safety) is invited to attend the working session
- The NCAA accepts that we shall only attend the working session for the sole purpose of presenting and discussing the proposed AOPA version of Part 139, as applied to D&E aerodromes. In other words, we are not prepared to discuss the latest version prepared by the NCAA.

The reason we are taking this stance is that over the past three years we have had numerous meetings, discussions and negotiations and have sent numerous letters and proposals to the NCAA in this connection, with little to no progress on our differences. Furthermore, we maintain that Part 139, as applied to categories D & E aerodromes, is only a "recommendation" from ICAO, for which the NCAA has no mandate to enforce.

Should you agree to our above proposal, the CEO of AOPA shall provide the NCAA with our proposed Part 139 (as applied to D&E aerodromes) on Monday 25th April, two days prior to the working session and we would be pleased to accept your invitation to attend the working session on the 27th April.

I look forward to your response to our proposal.

Yours sincerely,



.....
M.T. Dawe
President
AOPA Namibia
president@aopa.org.na