

RESPONSES TO DRAFT REPORT 'ABORTED TAKEOFF FROM TAXIWAY, BOEING 737-800, AMSTERDAM AIRPORT SCHIPHOL'

Organisation	Section/ paragraph	Page	Line number	Tekst to be corrected (first ... last word)	Argumentation for response	Additional information	Adopted?	Dutch Safety Board response
AAS	3.9	42	1/7	Algemene opmerking omtrent de gehele alinea	Het is naar ons idee de vraag of het vellen van een oordeel over een rapport van een 'andere' partij relevant is voor het doel van uw onderzoek.		Yes	Findings from the ISMS report are actually stated in Paragraph 2.9.7.
AAS	3.9	42	5	Furthermore, the above mentioned potential risk reduction action about securing CVR data is limited. Vervangen door: Furthermore, the above mentioned potential risk reduction action about securing CVR data was followed up by a review of the current protocols at home based carriers and the availability of CVR data in recent incidents which were followed-up in ISMS. It appeared that in 6 out of 7 relevant incidents the CVR data was available to support incident investigation.	N.a.v. de potential risk reduction action is het onderwerp CVR recorder nader onderzocht en geagendeerd in de standing committee flight van ISMS. Daarbij zijn de bestaande protocollen van de home based carriers geïnventariseerd evenals de beschikbaarheid van CVR data voor 7 relevante incident investigations. Het blijkt dat in de andere gevallen de CVR wel beschikbaar was. Het onderwerp is op 9 november 2020 in de SC Flight besproken.		No	Findings from the ISMS report are actually stated in Paragraph 2.9.7.
AAS	Summary	5	46	'open safety culture would improve safety even further' vervangen door 'open safety culture improves safety even further'	would suggereert dat er nu geen sprake is van een open safety culture. Hiernaar heeft OVV geen onderzoek gedaan, het is hooguit de interpretatie van OVV van een handeling van de runway controller.		Yes	Text has been removed.
AAS	Recommendations	7	14	other investigations, graag in een voetnoot aangeven welke dit zijn	In ISMS hebben we er, behalve in onderhavig geval, nog geen problemen mee ondervonden bij joint incident investigations. Vandaar dat wij benieuwd zijn om welke incidenten het gaat.		Yes	Footnote added.
EASA				We do not believe that the report determines clearly enough the reasons to reply to the following question in the report: "How could it happen that the flight crew initiated a takeoff from a taxiway without noticing it?" The report seems to recognise that the flight crew were not particularly busy or under unexpected workload, and they seem mentally prepared to take off from RWY 18C; however they confused a 23 meter wide TWY, whose edge lights are blue, with a 45 meter wide RWY with white edge lights. Moreover, according to the AIP, RWY 18C has CAT II/III configuration, which means that it has centreline lights (white), while TWY D has green lights. Other visual cues should have helped the flight crew to alert the crew on the error, e.g., the touchdown zone lights.			No	Environmental cues amplified the perception of the flight crew that they were lined up on Runway 18C, instead of on taxiway D. It likely attributed to a confirmation bias. Cues like the yellow, thin and continuous centre line marking and green centre line lights, were not recognised by the flight crew as cues of being on a taxiway. The depth of the analysis in Paragraph 3.3. is sufficient to be able to draw lessons from this.

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EASA	3.3	32	37-40	On page 32, there is a statement that seems to question the existing requirements for aerodrome lights: "Although a taxiway has green centre line lights and a runway has white centre line lights, the bright beam of an aeroplane's taxi or landing lights can make it hard to distinguish these colours under dark circumstances." This statement is not supported by technical/scientific evidence.			No	The 'live' reconstruction of the occurrence with a Boeing 737 showed that the bright beam of an aeroplane's taxi or landing lights can make it hard to distinguish these colours under dark circumstances. The text has been modified to clarify this.
EASA	3.4.2	34	27-28	On page 34, the report states the following: "The stop bar was not visible because no low visibility conditions existed and therefore it was not switched on." We would like to know whether there are specific requirements to operate the lights at Schiphol Airport and, in particular, the stop bars. The report seems to indicate that stop bars are only used when the low visibility procedures are in place. It also mentions that there have been measures specifically adopted to prevent runway incursions. However, the quoted sentence seems to deviate from a number of recommendations that seek to prevent runway incursions. On EASA's part, EASA GM1 ADR-DSN.M.730 Stop bars states the following: "Runway incursions may take place in all visibility or weather conditions. The provision of stop bars at runway-holding positions and their use at night and in visibility conditions greater than 550 m runway visual range can form part of effective runway incursion prevention measures." Moreover the EAPPRI recommends the use of stop bars round the clock (H24). We wonder whether the local runway safety team has evaluated the measures to prevent runway incursions and, in particular, evaluated the use of lights, including stop bars. We would assume that the stop bar preventing involuntary access to the runway active would be off due to the fact that the aircraft had been previously cleared to take off, and not because visibility was good at the time the event happened.'			Yes	The stop bar was not visible because the flight had been cleared for takeoff and therefore it was off. The text has been modified. If the local runway safety team has evaluated the measures to prevent runway incursions and in particular the use of lights, including stop bars, was not part of the investigation by the Dutch Safety Board.
IenW, ILT	1	4	41, 1, 2	This confirms (...) is handed.	In paragraaf 3.8 wordt beschreven dat "de taxi-route, die de bemanning in dit geval volgde, niet als complex te omschrijven is". Daarnaast is in het rapport Air traffic safety at Schiphol de (letterlijk) beschreven zin als overweging opgenomen, niet als conclusie.		Yes	Sentence has been removed. Contrary to the description in Paragraph 3.8 that the taxi route followed by the crew cannot be regarded as complex.

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lenW, ILT	1	5	33, 34	The decision (...) crew members.	Op deze manier kan de formulering wellicht verkeerd worden opgevat, met name "the decision should not be the sole responsibility of the flight crew". Ter overweging: De beslissing om de vlucht te continueren of niet lijkt mij wel aan de bemanning. De uiteindelijke verantwoordelijkheid hiervoor ligt mijns inziens ook bij hen. De overweging om te komen tot deze beslissing is een gedeelte verantwoordelijk. Zo heeft de company een verantwoordelijkheid om zo goed mogelijk te ondersteunen, bijvoorbeeld met duidelijke en ondubbelzinnige procedures. En heeft ATC idealiter, zoals ook beschreven, een verantwoordelijkheid om de crew te 'challengen'. Met andere woorden, de bemanning heeft de verantwoordelijkheid te besluiten. Zij kan echter door procedures in een bepaalde richting in worden gedwongen, bijvoorbeeld door procedures waaruit klip en klaar blijkt dat in geval van een serious incident niet mag worden gecontinueerd, tenzij ... Het is dus taak die procedures helder te maken als je dit wilt voorkomen.		Yes	Text has been removed. The decision to continue a flight rests with the captain.
lenW, ILT	2.1	15	4	Aborted takeoff	In het Boeing FCOM wordt dit de procedure voor een rejected take-off genoemd.		Yes	Text has been modified.
lenW, ILT	2.12.4	25	19	Keep	Wellicht veranderen in 'keep track of' of 'monitor'.		Yes	Text has been modified.
lenW, ILT	2.12.4	26	29-31	However, the (...) in the future.	Deze zin slaat nog op het rapport uit 2017. In dat rapport staat op pagina 7: "De Onderzoeksraad acht een besluit over verdere groei, voor of na 2021, pas mogelijk nadat de in dit rapport aanbevolen maatregelen zijn genomen en de risico's nu en in de toekomst structureel zijn verminderd" en op pagina 138: "Wel ziet de raad nu en voor de toekomst veiligheidsrisico's waarvoor diepgaande aandacht noodzakelijk is". De passage in dit rapport op pagina 26 regels 29 t/m 30 gaat verder dan beide citaten die hierboven zijn aangehaald en gaat dan ook verder dan het rapport uit 2017. Deze zin vormt dan ook een onjuiste weergave van het rapport uit 2017.		No	The sentence is neither a misrepresentation nor a contradiction. This sentence is also literally taken from the English summary of the report 'Schiphol air traffic safety'.
lenW, ILT	3.3	31	10	They both (...) not tired.	Checkvraag of hier in plaats van 'tired' niet 'fatigue' wordt bedoeld naar ICAO-definitie (=wel moe, maar geen invloed op functioneren)?		Partly	Text has been modified. The words 'and not tired' have been removed, because they have no added value over the words 'fit to fly' and no further investigation has been conducted into this.
lenW, ILT	3.3	33	6	Gevolgde procedure	Waarschijnlijk niet relevant voor het onderzoek, maar dit is niet de voorgeschreven takeoff procedure.		No	This is a representation of the actions by the flight crew.

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lenW, ILT	3.3	33	6	Throttle	Suggestie om te wijzigen in 'thrust'.		Yes	Text has been modified.
lenW, ILT	3.4	34	15-19	The air (...) Runway18C. Consequently, they (..) the night. This was (...) Manual's procedures.	De formulering/opbouw kan de vraag oproepen of i) ATC conform procedures had moeten weten dat er geen gecontinueerde belichting was, en zo ja of ii) het dan nog steeds conform procedures was geen additionele begeleiding te geven?		Yes	Text has been adjusted for clarity.
lenW, ILT	3.4.3	34/35	41-43, 1-5	In this (...) at Schiphol. As he (...) his frequency. The ground (...) Runway 18C.	Het "relied upon local knowlegde" schuurt wat met paragraaf 3.3 tweede alinea regel 12 tot 15, en gezien opmerking in de volgende rij. Daarbij in dat kader ook een vraag naar de relevantie van de opmerking "he heard from the pilot's voice that he was a Dutchman".		Partly	There were no indications to the ground controller that the crew would have trouble finding the holding point of Runway 18C. The sentence containing the said comment has been removed.
lenW, ILT	3.4.4	35	2-3, 23-27	Abeam C2 (...) Runway 18C. The runway (...) wrong turn. After a (...) the airport.	Checkvraag of het verzoek van de gezagvoerder om een intersectie take-off (W2, omweg) niet als indicatie had kunnen worden gezien dat de bemanning wellicht een verkeerde bocht neemt?		No	The crew indicated that they had no idea they were on taxiway Delta. They had no intention of taxiing to W2 after all.
lenW, ILT	3.5	37	4, 5	The decision (...) crew members.	Zie tweede rij.		Yes	Text has been removed.
lenW, ILT	3.5.2	37	32	Common knowledge	Dit is meer een aanname dan een feit.		No	This can be said to be known among professional pilots.
lenW, ILT	3.8	41	6, 7, 8	In the (...) is handled.	Zie eerste rij.		No	It is stated here that the taxi route the crew followed cannot be considered complex. The 'complex' way in which traffic is handled sometimes carries risks.
lenW, ILT	4	43, 44			Met betrekking tot de opmerkingen op 3.4.3 en 3.4.4 (zie hierboven) kan de vraag worden gesteld of er nog een conclusie dient te worden toegevoegd of de human factors van ATC een rol gespeeld hebben (aanname kennis van lay-out Schiphol en aanname Dutchman)?		No	It has already been mentioned among the factors that contributed to the incident that the runway controller did not consider its reduced focus on the Boeing 737 to be a risk, especially because it was a home-based carrier.
Captain	2.1	13	16	And C to be deleted	Taxi clearance was only issued: taxi to rwy 18C via B (C was not mentioned)		No	The recorded radio communication shows that the ground controller gave the following clearance to the crew of the Boeing 737 at 06.03 hours: 'Bravo and Charlie, taxi holding point RWY 18C'.
Captain	2.1	13	23	ATC did not tell to take taxi way C and was very busy with 3 China airlines cargo B777 of which one was on TWY D at C6	Aandacht moet geschonken worden aan het gegeven dat GND Control alleen taxi 18c Via B had gezegd, de beslissing om C te nemen was door de Cockpit crew genomen omdat D door een China B777 werd geblokkeerd.		No	The recorded radio communication shows that the ground controller gave the following clearance to the crew of the Boeing 737 at 06.03 hours: 'Bravo and Charlie, taxi holding point RWY 18C'.

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Captain	2.1.1	13	24	ATC ordered flight crew to change to tower frequency, just prior to entering taxi track C	Ground controller had het erg druk met de drie Chinese vrachtvliegtuigen en wij dachten dat ze ons liever kwijt dan rijk was.		No	Recorded radio communications show that the Boeing 737 crew reported that they were approaching Runway 18C and "ready for departure", after which the ground controller instructed them to contact the tower (on 118.105). The Boeing 737 was taxiing on taxiway Charlie at the time and had passed intersection C3.
Captain	2.1.1	13	29	It was busy on frequency but only on ground frequency tower frequency was clear, this text is applicable to the tower frequency and not ground frequency			Yes	Text has been modified.
Captain	2.1.1	14	8	The call was in Dutch "dat wordt wel een hele omweg".			No	The runway controller reported: 'Yes, but that is a long detour'. Translated in report to 'it is a long detour'.
Captain	2.1.1	14	16	Ground controller was female and not male	althans dat kwam op ons over.		No	The ground controller in question is a man.
Captain	2.1.1	15	13	Add the tekst: that crew was requested to taxion because they were blocking taxi track D for the china 777 that was taxiing from w5			No	Recorded radio communications show that the runway controller asked the crew if they were able to move. When the crew answered in the affirmative, the runway controller asked if they wanted to return to the runway. The crew confirmed this, whereupon the runway controller instructed to take the first possible left turn and taxi to W1. 40 seconds later, another aircraft at W5 received clearance to cross Runway 18C and then taxi via Taxiway Delta.
Captain	2.1.1	15	15	Flight crew did try to consult airline but due to position of aircraft bad radio coverage and the phone gave a busy and call back later message.	Er is wel gepoogd om met OCC te bellen/ radio echter niet gelukt, bovendien moesten we van ATC uit de weg omdat er een ander vliegtuig aankwam.		Partly	Text has been modified. However, the Dutch Safety Board was unable to verify this due to the lack of cockpit voice recorder data. The Board is of the opinion that in such a case not only should an attempt be made to make contact with the airline, but that contact should actually be established before the flight is being continued. The recorded radio communication does not show that the Boeing 737 had to get out of the way because of another aircraft.
Captain	2.1.1	15	18	Again an attempt was made to contact occ, but it still did not work.	Eenmaal uit de weg is weer met occ gepoogd te spreken, echter weer in gesprek en nog steeds geen radio contact.		Yes	Text has been modified.
Captain	2.1.1	15	20	This time take off clearance was issued after line up and after entering runway.			Yes	Text has been modified.

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Captain	2.1.2	15	27	This was normal practice for Schiphol as the aircraft that were taxiing in were Air china cargo planes , and they do not want to taxi further.	In the past if rwy 36c/18c was in use no crossing was allowed to eliminate runway incursions but china always got crossing clearance.		No	This does not concern factual inaccuracies.
Captain	2.2	15	41	Lighting at Amsterdam was always an issue and due to wip at SPL a lot of lighting was off	Het is nu weer een probleem 2 jaar na dato. Ivm energie besparing.		No	This does not concern factual inaccuracies.
Captain	2.7.1	17	14	The image here is not wat was at the time of incident, as the taxi track C1 is different.	Het kaartje ziet er anders uit dan wat aan boord was, dit kaartje werd een week later veranderd door een ander kaartje		No	The purpose of this figure is to give a picture of the infrastructure east of Runway 18C/36C.
Captain	2.7.2	18	8	However standard practice was that take off 18D taxi way D north bound is used.			No	In the period from 22.45 hours on 5 September until the rejected takeoff from taxiway Delta, which took place at 06.10 hours the following morning, 23 aircraft took off from Runway 18C. Eleven of these aircraft taxied via Taxiway Charlie. The Dutch Safety Board has not conducted any further investigation into the use of the Charlie and Delta taxiways.
Captain	2.7.3	20	18	Amsterdam is known for not switching on lights or broken lights.			No	This does not concern factual inaccuracies.
Captain	3.2	30	26	But AC have to cross an active runway increasing risc to runway incursions, however China always crosses at W5 (to reduce cost)			No	This does not concern factual inaccuracies.
Captain	3.2	30	35	Ground controller issued clearance to taxi via B only			No	The recorded radio communication shows that the ground controller gave the following clearance to the crew of the Boeing 737 at 06.03 hours: 'Bravo and Charlie, taxi holding point RWY 18C'.
Captain	3.2	31	1	Taxiway C was chosen because a China Airline B777 was blocking W6 and Taxiway D			No	The recorded radio communication shows that the ground controller gave the following clearance to the crew of the Boeing 737 at 06.03 hours: 'Bravo and Charlie, taxi holding point RWY 18C'.
Captain	3.3	32	9	The runway identifier signs were not lit, the taxiway edge lights were not lit			Yes	Text has been adjusted in Paragraphs 2.1.1 and in 3.3.
Captain	3.3		40	The taxi centre lights on the straight were not lit, only in the turns			No	This has already been mentioned in Paragraph 2.1.1.
Captain	3.4	34	39	W4 should be W5			No	The Boeing 737 had passed C3.
Captain	3.5	36	36	The crew did try to contact OCC however line was busy (tried 2 phone numbers) and radio coverage with OCC at that position is bad. ATC was also pressing to get out of the way because of other traffic.			Partly	Text has been modified. The recorded radio communication does not show that air traffic control exerted pressure to make room for other traffic.

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LVNL	Summary	5	1-2	at Schiphol that Schiphol is a complex airport, both in terms of its infrastructure and in terms of how air traffic is handled	The air traffic is handled in a standardized way, known to pilots. This in itself is not complex. Suggest to reformulate to: "Schiphol is a complex airport by nature of the infrastructure, geometry of the runways and taxiways, and by some of the procedures that require specific runway use for reasons other than safety."		No	Sentence has been removed. Contrary to the description in Paragraph 3.8 that the taxi route followed by the crew cannot be regarded as complex.
LVNL	Summary	6	4-7	This also means that in an open safety culture a runway controller of Air Traffic Control the Netherlands should challenge a flight crew's decision to continue the flight after a serious incident, like the rejected takeoff from a taxiway.	We might agree that there could be occasions where the controller could challenge a flight crew on their decision, e.g. in case of illogical intentions, unusual weather or other circumstances of which the controller has knowledge and is – given the decision of the crew – unsure if the crew is sufficiently aware. Broadly however, it is not seen as a responsibility of the controller to challenge crew's decisions. For this incident, the controller did not have any indication that the crew could possibly be impaired or that there were other reasons that could signal against continuing their flight. Instead, the runway controller asked if the crew needed any assistance from fire brigade (negative) and queried if they were able to move (affirm). As such, after the incident, there were no unusual circumstances for the controller to recognise the need to challenge the flight crew.		Partly	Text has been rewritten. The words 'open safety culture' have been removed because no investigation has been carried out into the safety culture within LVNL and Transavia. It has now been stated that the Dutch Safety Board appeals to the relevant parties at Schiphol to foster a working environment where challenging each other about safety decisions in abnormal situations is accepted.
LVNL	3.4.2	34	30-32	As they always did and conform the procedures, the air traffic controllers did not provide additional guidance to the flight crew, taxiing on Taxiway C towards the holding point of Runway 18C, to compensate for the limited infrastructural guidance.	Suggest to change this into: "As was customary and according to the procedures in force, the air traffic controllers did not provide additional guidance to the flight crew taxiing on Taxiway C towards the holding point of Runway 18C."		Yes	Text has been modified.
LVNL	3.5.1	37	19-21	In an open safety culture, a runway controller of Air Traffic Control the Netherlands should challenge a flight crew's decision to continue the flight after a serious incident, like the rejected takeoff from a taxiway.	See comment above page 6. LVNL does not agree that a challenge by the runway controller to the crew would have been appropriate at this occasion. The crew had decided they were good to go, and were thus further supported as such by the controller.		Yes	Text has been removed.

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Transavia	Introduction	12	7-8	Notie 1: Classificatie incident. Regulation 996/2010 lists an aborted take off on a taxiway as an example of a serious incident.	De lijst in de regelgeving waarnaar wordt verwezen betreft geen harde voorbeelden van serious incidenten, zoals in het rapport wordt aangegeven. Het zijn mogelijke serious incidenten. Per geval zal moeten worden beoordeeld of er daadwerkelijk sprake is geweest van een serious incident (means an incident involving circumstances indicating that there was a high probability of an accident). Kijkend naar het onderhavige incident er was goed zicht, de taxibaan had voldoende lengte voor een veilige take off, er was geen ander verkeer op de baan aanwezig en bovenal het safety-net heeft gewerkt – de verkeersleider heeft namelijk opdracht gegeven om de take off af te breken, hetgeen direct is opgevolgd. Bij dit incident is dan ook geen sprake geweest van een grote kans op een ongeluk. Op grond van het vorenstaande concluderen wij dat er in dit geval geen sprake is geweest van een serious incident zoals bedoeld in Regulation EU996/2010.	Overarching response. This notion is referenced in review comments.	Does not apply.	
Transavia	Summary	5	41-43	Notie 2: Beslissing voortzetten vlucht en CVR-data niet beschikbaar. It is impossible for the Board to understand why the flight crew immediately continued the flight and did not secure the CVR data. As a result, it is not possible to learn optimally from this occurrence.		Overarching response. This notion is referenced in review comments.	Does not apply.	
Transavia	3.5.1	37	4-7	Reactie vwb voortzetten vlucht. The decision to continue a flight after a serious incident should therefore not be the sole responsibility of the flight crew members. The relevant procedures within the company must be laid down clearly and unambiguously.	In deze stelling wordt aangenomen dat het besluit om door te vliegen na een serious incident (los van het feit dat de bemanning het incident niet als een serious incident zoals bedoeld in EU996/2010 heeft beschouwd) niet alleen door de flight crew kan worden genomen. Het rapport geeft in dit verband geen duidelijkheid over de wijze waarop dit is belegd in de wettelijke kaders die gelden voor de gezagvoerder in termen van verantwoordelijkheid voor de vluchtuitvoering (CAT.GEN.MPA.105). De helderheid over besluitvorming om wel of niet door te vliegen dient ook te worden ondersteund met wettelijke kaders. Zoals nu beschreven in het rapport is het een niet onderbouwde zienswijze van de onderzoekers.	Overarching response. This notion is referenced in review comments.	Does not apply.	

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Transavia				Reactie vwb CVR data niet beschikbaar	In het rapport wordt meerdere keren aangegeven dat het niet beschikbaar zijn van de CVR-data het onderzoek heeft belemmerd, omdat de CVR-data cruciaal is voor het onderzoek. CVR-data kan zeker van waarde zijn bij een onderzoek, maar in dit geval is niet bekend wat er op het tijdstip rondom het incident op de CVR heeft gestaan en kan er zodoende niet worden geconcludeerd dat er cruciale informatie ontbreekt. Dit is een tegenfeitelijkheid en hoort niet in het rapport.	Overarching response. This notion is referenced in review comments.	Does not apply.	
Transavia					Voor incidenten en accidenten waarvoor de bemanning verantwoording kan afleggen heeft de CVR-data maar beperkte waarde. De CVR data is vooral van waarde voor die gevallen wanneer de bemanning om wat voor reden niet beschikbaar is voor een interview. Bij dit incident was de bemanning direct na terugkeer op de thuisbasis (AMS) beschikbaar gemaakt voor een interview door de OVV. In het rapport wordt niet duidelijk gemaakt welke informatie de onderzoekers missen. Opvallend is dat de betreffende bemanning vervolgens niet nader door de OVV zijn bevestigd.	Overarching response. This notion is referenced in review comments.	Does not apply.	

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Transavia					<p>Vwb de regelgeving is hier EU965/2012 - CAT. GEN.MPA.105 (10) van toepassing.</p> <p>(i) flight recorders are not disabled or switched off during flight;</p> <p>(ii) in the event of an occurrence other than an accident or a serious incident that shall be reported according to ORO.GEN.160(a), flight recorders' recordings are not intentionally erased; and</p> <p>(iii) in the event of an accident or a serious incident, or if preservation of recordings of flight recorders is directed by the investigating authority:</p> <p>(A) flight recorders' recordings are not intentionally erased;</p> <p>(B) flight recorders are deactivated immediately after the flight is completed; and</p> <p>(C) precautionary measures to preserve the recordings of flight recorders are taken before leaving the flight crew compartment;</p> <p>Dit betekent dat het niet is toegestaan om flight recorders zeker te stellen tijdens de vlucht. Dit geldt ook in geval van een accident of een serious incident. In dit geval heeft de bemanning het incident niet als een serious incident aangemerkt en is vwb de CVR gehandeld cfm sub (i) en sub (ii). De bemanning heeft in deze dan ook cfm de regelgeving gehandeld. In het rapport wordt herhaaldelijk benoemd dat de bemanning de CVR data ten tijde van het incident had moeten zekerstellen. Op grond van de huidige regelgeving is dit niet toegestaan.</p>	Overarching response. This notion is referenced in review comments.	Does not apply.	
Transavia				Notie 3: Open safety culture / Just Culture	<p>In het rapport wordt de suggestie gewekt dat een open safety culture en just culture in onvoldoende mate bij de betrokken partijen waaronder Transavia aanwezig zijn. Eerstgenoemde wordt louter gebaseerd op het feit dat de runway controller de gezagvoerder niet heeft bevraagd op diens besluit om de vlucht voort te zetten. Gebrek aan voldoende niveau van just culture is enkel gebaseerd op het feit dat de gezagvoerder het incident niet terstond maar pas na afloop van zijn vlucht vanaf het buitenstation heeft gemeld en de CVR data niet had zeker gesteld. [...]</p>	Overarching response. This notion is referenced in review comments.	Does not apply.	

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Transavia	Summary	5	26-28	This occurrence shows ... CVR recordings	Zie notie 1 + Tekst suggereert dat er een verplichting is om een serious incident direct tijdens de vlucht aan de luchtvaartmaatschappij te melden. Hier is echter geen verplichting of wettelijke kader voor. Daarmee is het geen vanzelfsprekendheid dat elke Nederlandse luchtvaartmaatschappij een company policy heeft waarin dit is vastgelegd. Het voorval is direct na de vlucht aan de luchtvaartmaatschappij gemeld.		No	The Dutch Safety Board is of the opinion that a captain should contact the airline after a serious incident and then jointly decide which follow-up actions should be taken. This is despite the fact that the captain is responsible for a safe flight operation.
Transavia	Summary	5	33-35	The decision .. clearly and unambiguously.	Zie notie 2.		Yes	Text has been modified.
Transavia	Summary	5	37-38	CVR data is crucial sequence of events.	Zie notie 2. + De CVR data is vooral van waarde voor die gevallen wanneer de bemanning om wat voor reden niet beschikbaar is voor een interview. Bij dit incident was de bemanning direct na terugkeer op de thuisbasis (AMS) beschikbaar gemaakt voor een interview door de OVV.		No	With the help of the CVR data it can be determined with certainty which communication has taken place between the two pilots.
Transavia	Summary	5	39	... why the taxiway was chosen...	De bemanning heeft niet besloten om vanaf de taxibaan te starten. Zij meenden de startbaan op te rijden.		Yes	Text has been modified.
Transavia	Summary	5	41-43	In view of all this ... from this occurrence.	Zie notie 2.		Yes	Text has been modified.
Transavia	Summary	5, 6	45-7	An open safety culture ... from a taxiway.	Zie notie 3.		Yes	Text has been modified.
Transavia	Summary	6	11-12	An attempted ... a serious incident.	Zie notie 1.		Yes	Text has been removed.
Transavia	Summary	6	9-14	In order to ... the event.	De tekst suggereert dat de betrokken partijen onvoldoende verantwoordelijkheid hebben genomen om benodigde stappen te zetten om lering uit het incident te trekken. Het incident is daarentegen wel degelijk serieus door de betrokken partijen in ISMS verband opgepakt. Er is gezamenlijk onderzoek gedaan. Hieruit zijn acties voortgekomen die deels zijn geïmplementeerd en deels nog lopen.		Yes	Text has been removed.
Transavia	Recommendations	7	2-6	During this investigation ... airline first.	Zie notie 2.		Partly	With the help of the CVR data it can be determined with certainty which communication has taken place between the two pilots. It is now more clearly described that the investigation into the decision-making process was hampered by the lack of CVR data.
Transavia	Recommendations	7	9-11	In view of ... CVR data.	Zie notie 2 + Waarom is het voor OVV onmogelijk om de bemanning te begrijpen? De bemanning was tijdens het onderzoek voor OVV beschikbaar, maar is na het initiële interview direct na terugkeer van de incidentvlucht niet meer door OVV bevestigd.		Yes	Text has been removed.

Organisation	Section/ paragraph	Page	Line number	Tekst to be corrected (first ... last word)	Argumentation for response	Additional information	Adopted?	Dutch Safety Board response
Transavia	General overview	10			Vermelding van de naam van de luchtmaatschappij en de vliegtuigregistratie heeft geen toegevoegde waarde voor het onderzoek. Verzoek is om deze informatie achterwege te laten.		No	The Dutch Safety Board's policy is to state the names of legal entities (companies, administrative bodies, etc.) in reports. As far as the frequency of this is concerned, this is done with restraint. The same applies to the mention of aircraft registrations.
Transavia	1	12	6-7	Regulation (EU) ... serious incident.	Zie notie 1.		Partly	Text has been modified. The Dutch Safety Board has classified the occurrence as a serious incident. This has been added.
Transavia	1	12	26	the accident is analysed	Het betreft geen accident maar een incident.		Partly	Text has been modified. The word 'accident' has been replaced by 'occurrence'.
Transavia	2.1.1	14	12	After lining up ... landing lights.	De landingslichten werden eerder aangedaan, nl in de bocht van taxibaan C naar taxibaan D (staat ook verderop in het rapport). Dit was omdat er in deze bocht geen taxibaan middenverlichting aanwezig is.		Yes	Text has been modified.
Transavia	2.10	22	18-28	Airlines are ... on board.	Zie notie 1 + De bemanning heeft cfm de genoemde regels gehandeld. Zij hebben de luchtvaartmaatschappij direct na afloop van de vlucht geïnformeerd en daarbij is gesproken over het zekerstellen van de vluchtdata.		No	These text blocks contain procedures as described in Regulation (EU) No 965/2012.
Transavia	2.10	22	34-35	The CVR data ... rejected take off.	Zie noties 1 en 2. Hier is geen verplichting voor.		Yes	Text has been modified.
Transavia	3.3	31	34-35	to ensure that ... flight crew.	Wat is de 'highest degree of situational awareness'? Dit begrip wordt niet nader uitgelegd.		Yes	Text has been modified.
Transavia	3.5.1	36	36-37	They did not ... such as this.	Zie notie 2 Wat is de basis voor 'it is normal procedure to do so'?		Yes	Text has been modified.
Transavia	3.5.1	36	42-43	In the interest ... flight first.	De tekst impliceert dat het bemanning behoort te worden verboden om na een incident te blijven vliegen. Deze claim wordt niet door ons ondersteund. Tevens is er geen regelgeving die dit oplegt.		Partly	Text has been modified. It has now been stated that it is important for investigators to speak to the crew as soon as possible after such an incident rather than having them perform a flight first.
Transavia	3.5.1.	37	4-7	The decision to continue.....and unambiguously	Zie note 2 + De helderheid over besluitvorming om wel of niet door te vliegen dient ook te worden ondersteund met wettelijke kaders.		Yes	Text has been modified.
Transavia	3.5.1	37	11-13	However an open safety culture ... even further.	Zie notie 3.		Yes	Text has been removed.

Organisation	Section/ paragraph	Page	Line number	Tekst to be corrected (first ... last word)	Argumentation for response	Additional information	Adopted?	Dutch Safety Board response
Transavia	3.5.1	37	19-21	In an open safety culture ... from a taxiway.	Zie notie 3 + Het is niet duidelijk waarom ATC een beslissing van een bemanning moet challengen als er zoals in dit geval geen regels worden overschreden. Waarom vindt OVV dit?		Yes	Text has been removed.
Transavia	3.5.2	37	24-25	After the rejected ... data on it.	Zie notie 2 + Regelgeving schrijft voor dat de CVR data pas na afloop van de vlucht mag worden zeker gesteld.		Yes	Text has been removed.
Transavia	3.5.2	37	33-37	The Board expects from professional pilots ... OCC first.	De bemanning heeft cfm regelgeving gehandeld. De tekst impliceert dat de bemanning niet aan de verwachting van OVV heeft voldaan en worden zodoende als minder professioneel beschouwd. Het is niet duidelijk waar de verwachting van OVV op is gebaseerd. Dit svp in het rapport nader onderbouwen.		Yes	Text has been modified.
Transavia	3.5.2	37	37-39	Due to ... during taxi out.	Zie notie 2.		No	Due to the unavailability of the CVR data, despite the interviews with the crew, it cannot be established with certainty what exactly was discussed and happened in the cockpit during taxiing and during and after the rejected takeoff.
Transavia	3.5.2	37-38	43-2	The Board emphasizes ... by the Board.	Zie notie 2.		No	Due to the unavailability of the CVR data, despite the interviews with the crew, it cannot be established with certainty what exactly was discussed and happened in the cockpit during taxiing and during and after the rejected takeoff.
Transavia	3.5.2	38	4-8	In case of ... recorder data.	Zie notie 2 + Regelgeving schrijft niet voor dat een vlucht moet worden afgebroken om CVR data zeker te kunnen stellen. Men is zich bewust van de beperkingen van de CVR en men accepteert dat in geval van een incident CVR data niet altijd beschikbaar is.		Yes	Text has been modified.
Transavia	3.5.2	38	8-14	It is desirable ... this occurrence.	Zie notie 3.		Yes	Text has been removed.
Transavia	3.5.2	38	27	Notifying the airline about the serious incident	Dat sprake zou zijn van een serious incident als bedoeld in EU996/2010 is een aanname. Zie notie 1 voor onze zienswijze.		No	The Dutch Safety Board classified the occurrence as a serious incident because it involved an uncontrolled situation in which a commercial aircraft with passengers on board was traveling at speed over a taxiway.
Transavia	3.5.2	38	26-40	The occurrence ... CVR data.	Zie noties 2.		Yes	Text has been modified.

Organisation	Section/ paragraph	Page	Line number	Tekst to be corrected (first ... last word)	Argumentation for response	Additional information	Adopted?	Dutch Safety Board response
Transavia	3.5.2	38-39	42-2	In order to ... from the event.	Conform opmerking bij summary pag 6 regels 9-14. De tekst suggereert dat de betrokken partijen onvoldoende verantwoordelijkheid hebben genomen om benodigde stappen te zetten om lering uit het incident te trekken. Het incident is daarentegen wel degelijk serieus door de betrokken partijen in ISMS verband opgepakt. Er is gezamenlijk onderzoek gedaan. Hieruit zijn acties voortgekomen die deels zijn geïmplementeerd en deels nog lopen.		Yes	Text has been removed.
Transavia	3.9	41	27-30	The ISMS report ... of the flight.	CVR data is voor geen enkel ISMS onderzoek beschikbaar. Conform afspraak met de VNV mogen CVR read outs enkel en alleen worden gedeeld met National Safety Boards in geval van een ICAO annex 13 of EU996/2010 onderzoek.		Yes	Text has been removed.
Transavia	3.9	42	1-7	The Dutch Safety Board ... ISMS investigation report.	Zelfde opmerking als bij par 3.9 pag 41 regels 27-30. Zie tevens notie 2.		Yes	Text has been removed.
Transavia	Conclusions	43	3-5	Second, not securing ... from this occurrence.	Hier staat dat het ontbreken van de CVR-data er toe leidt dat niet optimaal van het incident kan worden geleerd. Deze weergave is veel genuanceerder dan elders in het rapport. Het heeft voorkeur dat deze genuanceerde weergave op alle betreffende punten in het gehele rapport wordt gebruikt.		Yes	Text has been modified in Paragraph 3.5.2.
Transavia	Conclusions	43	30-40	This occurrence shows ... from this occurrence.	Zie noties 1 en 2.		No	Despite the fact that the captain is not obliged to consult with his/her airline about abnormal situations that have had or may have significant flight safety implications, the Dutch Safety Board is of the opinion that he/she should do this in order to subsequently decide jointly which follow-up actions should be taken.
Transavia	Conclusions	44	4-9	An open safety culture ... Schiphol's operations.	Zie notie 3 + Het ISMS onderzoek is een perfect voorbeeld van hoe de verschillende betrokken partijen samenwerken om de veiligheid gezamenlijk, efficiënt en effectief te verbeteren. In een kort tijdsbestek zijn door toedoen van het ISMS onderzoek diverse veiligheidsverbeteringen gerealiseerd. De hier aangehaalde tekst gaat hier volledig aan voorbij. De tekst insinueert dat er verbeteringen mogelijk zijn, echter zonder deze te benoemen en te onderbouwen.		Yes	Text has been removed.
Transavia	Recommendations	45	2-10	During this investigation ... CVR data.	Zie noties 1 en 2.		Yes	Text has been modified.