

<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>Large Aeroplane category - SC F-01 – Issue 2</b>

### **Commenter 1 : Eurocopter**

#### **Comment # 1 – General**

Such systems are subject to the general safety requirements (typically § xx.1309), therefore it is proposed to add a sixth item, as follow :

6. Safety Assessment
  - The applicant shall perform a Functional Hazard Assessment (FHA) and a System Safety Assessment (SSA) to establish the system criticality and hazards associated with the proposed installation.
  - The reliability and design assurance levels of the system must be commensurate with the established failure conditions severity classification.

#### **EASA response:**

***The requirements of XX.1309 are part of the original certification basis for most of the types that may have these systems installed and therefore it is EASA opinion that to mention them specifically in this Special Condition is not required. In the unlikely event that the aircraft certification basis is so old that xx.1309 was not present or is not considered acceptable then xx.1309 will be applied on a case by case basis using a separate CRI.***

### **Commenter 2 : General Authority of Civil Aviation (NAA)**

#### **Comment # 2 - General**

We, as the authority of the state of registry have no problem granting operational approval, however the last statement about the state in who's airspace it is to be used is questionable. First of all the system is ineffective above certain altitude and therefore, for fly-over no permissions are required. For approaches there may be some concern if the system is inadvertently activated. However, the System Safety Analysis provided indicates that the probability of inadvertent activation and the danger to others is minimized. I believe it is impractical to instate an operational restriction of that nature on the aircraft.

#### **EASA response:**

***EASA has no responsibility for Airspace in the EU, that is under the jurisdiction of the EU Member States. Some states have airspace regulations that***

***specifically prohibit dropping or discharging items from aircraft.***

***EASA rejects this comment and the wording will remain unchanged. It can only be the Operators responsibility to ascertain if the functioning of this system is legal in the airspace in which they are conducting their operations.***

### ***Commenter 3 : Civil Aviation Authority UK***

#### ***Comment # 3 – Statement of issue***

Is 'Decoy' the only technology under consideration? What about the others such as lasers ?  
The commentator would propose 'Deploy countermeasures'

#### ***EASA response:***

***EASA believes the dictionary definition of “Decoy” can equally well apply to directed energy devices as well as physical decoys and therefore proposes to leave the wording as it is.***

#### ***Comment # 4 – Statement of issue***

It is not practical to obtain operational approval for each state overflown with the system installed.

An individual operator with a global operation might feel the security threat to them is such that the system should be permanently fitted to their aircraft, and it would be unreasonable to require the approval of all States, including those where they are just passing through rather than landing.

Where approvals are also required, we would expect the operations implementing rules (OR/AR) to state the need, with associated AMC/GM. Is this item going to be added to the Ops Rulemaking plan?

If the system is fitted on a “no hazard” basis, why is any other approval needed?

We do not require an approval for other systems such as in-flight entertainment systems.

#### ***EASA response:***

***EASA has no responsibility for Airspace in the EU, that is under the jurisdiction of the EU Member States. Some states have airspace regulations that specifically prohibit dropping or discharging items from aircraft.***

***EASA rejects this comment and the wording will remain unchanged. It can only be the Operators responsibility to ascertain if the functioning of this system is legal in the airspace in which they are conducting their operations***

***The Certification Directorate at EASA is not responsible for creating OR/AR material. This comment will be passed to the Rulemaking Directorate.***

***Unlike an IFE system, this system is releasing a decoy into the airspace, the operator must ensure he is compliant with or has approval from the Agency or Authority that controls that Airspace.***

#### ***Comment # 5 – Last paragraph***

The editorial observation: "...EASA has no published performance..." should read "...EASA has not published performance...".

***EASA response:***

***Noted EASA will tidy up the wording.***