EASA	COMMENT RESPONSE DOCUMENT
	Enhanced Flight Vision System (EFVS) with Ops Credit Applicable to Falcon F7X - SC F-47 – Issue 2

Commenter 1 : CAA-UK

Comment # 1 –

4. Acceptable Means of Compliance
c) Systems requirements

(iv) ***Recording. The EFVS should be taken into account when showing compliance to CS 25.1459(e). As a minimum, a discrete signal, indicating when the EFVS image is displayed, must be recorded in addition to the "HUD in use" parameter.***

Comment:
The raster image should be recorded.

Justification:
This technology has a relatively low level of operational understanding. In the event of an incident it will not be enough to consider meteorological information to assess effective pilot visibility as at present. A recorded view will be essential for analysis. The level of impact protection for the recorder should be consistent with recorders for other aircraft data.

EASA response:
Noted.
However, although EASA recognizes the potential problem related to pilot misinterpretation of the EFVS image and the value of having the IR image available for accident investigation, the requirement for recording of the raster image is not feasible taking into account the currently available DFDR capacity. EASA also does not require full recording of PFD/HUD symbology for other operations as critical as EFVS such as Cat III. This is the reason why the Special Condition request only to record the use of the EFVS.

Commenter 1 : CAA-UK

Comment # 2 –

4. Acceptable Means of Compliance
c) Systems requirements

(vii) ***<u>Co-Pilot's Repeater Display</u>. An additional view of the EFVS image for the pilot not-flying (PNF) is needed to address multi-pilot philosophy (operations in RVRs below 550m will require two pilots operation). It enables the PNF to be kept in the 'loop' and crew resource management will not break down. The PNF can be isolated from the information necessary for monitoring flight progress and decision making if the flying pilot is the only one that would have access to the EFVS image (See also ED-179, paragraph 3.2.5.3.).***

Comment:
The wording in the next version of ED179 is very likely to contain a fuller explanation of the intended function of the repeater display (see below) and it is suggested that the evaluation should take the content into account.

Justification:
This will provide a better basis for the evaluation.

Proposed Text (if applicable):
Add:
'The intended function of the repeater is to provide the PM with access to the same image that the PF uses to adjust flight progress and decision making in accordance with crew procedures but not necessarily to be monitored continuously. It must be suitable to enable crosscheck of the correct interpretation of the image by the PF, particularly when the image of the required visual landing cues is first identified. The position, size, ease of use, clarity and content of the display must be evaluated by flight test as suitable to enable the PM to use it as described. '

EASA response:
Noted.
A future EFVS CRI will contain the updated definition and rationale for the intended function of Pilot Monitoring repeater display, which was drafted by EASA. However, whether or not the future version of ED-179 will be applied depends on whether EASA agrees with its content. This is still under discussion. Therefore for this Special Condition, the wording is maintained according to the current official version of ED179.