EASA	COMMENT RESPONSE DOCUMENT
	EASA PSC No. SC-CVLA.0521-01 **[Published on the 06-Aug-2009 and officially closed for comments on the 25-Sep-2009]**

Commenter 1 :CAA UK – date 23-Sep-2009

Comment # 1

Page 5, Paragraph No: SC para 1.7 (b)(2)

Comment: Typographical errors exist in the current proposed SC text :–

- The reference to "figure 3 of Appendix A" should read "figure 3 of Appendix 1"....
- In the printed version of the pdf document, the equation for Pch appears to have the squared term in the wrong position - i.e. the Vs1 term should be squared and not the K2 term, see FAR 23.533 (b)(2) for original equation which reads :-

$$P_{ch} = \frac{C_3 K_2 V_{S1}{}^2}{Tan\beta}$$

Justification: See above comments – the errors appear to have been introduced when transcribing text to the proposed SC from CS 23 Water Loads, the equation error can be seen by comparison with CS / FAR 23.533(b)(2) text. (The equation may have been corrupted in the process of preparing the pdf document from the original Word document).

EASA response:

EASA partially agrees:

to Bullet 1: wrong reference in SC will be corrected
to Bullet 2: make of pdf-file and printout of pdf-file has been checked. Test-printouts have been made on different printers. pdf-file on screen and printouts were found to be without failure (Adobe Reader Version 9). Reported problem was not traceable. No change will be done on the document.

Comment # 2

Page 1 and pages 11 and 12, Paragraph No: SC para 1.1 (c) and Appendix 2, AMC to 1.1, para (I) “Seaplane (amphibian) seaworthiness”

Comment: The SC para 1.1 (c) and associated Appendix 2, AMC to 1.1 para (I) are not fully explicit with regards to the "seaworthiness aspects” and the purpose of the derived wave heights / limitations which are intended to produce structural water loading that is compatible with the SC body text derived water loads and hence the structural capability of the seaplane (amphibian).
The author needs to clarify the full intent of this AMC material and to seek explicit checks / promulgation of “wind wave” and “swell wave” height limitations in the flight manual in order to ensure safe operations on water.

Justification: See above comments –safe wave height limitations are established but do not appear to be required to be promulgated and /or checked with limitations in the AFM.

Proposed Text (if applicable): In order to make this matter explicit it is suggested that a cross reference link be added to the operating limitations of VLA Subpart G, VLA 1501 and the requirement to promulgate and/or check flight manual limitations for wave heights that are allowed for safe operation.
One notes that typically, (reference Be-200ES-E AFM, General Operation Limitations) the AFM contains "Water Take-Off/Landing Minima", (typically this would include "wave height, up to, ft (m) ....# (#)", "maximum allowable ripple, ft (m).... #, (#)", (Note also that Flight considerations typically also require establishment of "minimum cloud ceiling , ft (m).... # (#)", and "minimum horizontal visibility, n.m, (m).... # (#)").

EASA response:

EASA agrees:

It is the understanding of EASA that wave heights must be taken into consideration under VLA.1501. If the limiting factor for the wave heights is derived from the structural strength / capability, those heights must be stated in the AFM.

To be more precise in the SC a note will be added to highlight this understanding.

Note:

When writing the EASA response, the responder should express first whether EASA agrees, partially agrees, or disagrees with the submitted comment /change proposal and should explain the grounds of the response.
[e.g. “we disagree. Vibration trend monitoring is successful in detecting cracked HPT seals, /… / and is the most practical way to prevent an unsafe condition due to cracked HPT seals. The AD remains unchanged.” or “we agree. We have added the aeroplane model to the applicability”]