

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	Airbus Helicopters	-	-	<p>Airbus Helicopters has reviewed the proposed ESF and welcomes the introduction of such an evolution in the elaboration of the performance data for Category A take-off procedure.</p> <p>However, in order to enable the Industry to take benefit of this ESF for other helicopters having different OEI ratings, although still fulfilling the conditions of the ESF, we suggest to extend the applicability of this ESF.</p>	<p>One way to achieve this objective is to introduce in the ESF, possibly under the paragraph “Justification of an ESF” the following sentence:</p> <p>“This ESF is also valid when replacing the reference to the 2 ½ minutes OEI rating by a combination of a 30 seconds OEI rating and a 2 minutes OEI rating.”</p>	YES	NO	Noted	<p>The findings and mitigations that justify a level of safety equivalent to CS 29.1587(a) (6) (ii) have been assessed in the framework of a certification project for the specific case of 2 ½ minute OEI rating application and for dedicated Category A procedures.</p> <p>At the moment there is no straightforward evidence on how this ESF could be justified for a different rating system and therefore the proposal would result in a generalisation of the technical content of this ESF that is not supported by any real case.</p> <p>Any different OEI rating than the 2 ½ minute would need to be assessed in order to ensure that an equivalent level of safety could still be achieved.</p> <p>It remains still possible for an applicant to propose an ESF based on the current one, but with a different OEI rating, with the necessary justifications.</p> <p>EASA will also assess the possibility to include in a future update of the Certification Specifications this evolution of the Category A procedures in the RFM, which allows an easier conduct of the manoeuvre with a steeper rate of climb approach.</p>

* Please complete this column using the word “yes” or “no”
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