

Comment				Comment summary	Suggested resolution	From the commenter point of view a modification of the published text is*: -Not requested; -Recommended; -Requested	EASA comment disposition	EASA response
NR	Name of the organisation commenting	Section, table, figure	Page					
1	Aircraft Completion Engineering (ACE)	3.2. Guidance for Air Medical Services	Page 6 of 8	ACE supports this clarification of the “loose items” which is welcome: <i>“A clear segregation between installation provisions and the approved configuration should be provided. Equipment that may be brought on board together with or carried by the patient(s) can be considered as loose items under operators responsibility. If a passenger or crew member is not able to carry by him- / herself, a medical oxygen cylinder, (which is brought on board either on a stretcher or by a passenger), it cannot be considered as a loose item that can be safely stored without particular provisions.”</i>		Not requested	Noted	Thanks for the positive feedback.
2	Aircraft Completion Engineering (ACE)	3.2. Guidance for Air Medical Services	Page 6 of 8	The last revision of the quoted FAQ’s is from 2014 which questions their validity respected to this CM. Extract from the CM: <i>“See also Frequently Asked Question on Dangerous Goods and in particular [link]: Q1: What are the rules for passengers using bottled oxygen on board an aircraft? Q2: What are the rules concerning the carriage of portable air concentrators (POC) on board? Can they be used during the whole flight?”</i>	Validity to be confirmed.	Recommended	Noted	Thank you for your comment. The validity of these FAQ’s is confirmed.
3	Aircraft Completion Engineering (ACE)	3.2. Guidance for Air Medical Services	Page 7 of 8	For carriage of oxygen bottles, the wording is still ambiguous as it does not convey the need for certification of the bottle. Extract from the CM: <i>“Provisions for carriage of oxygen bottles are supported by EASA when appropriately placarded: Provisions only. Not certified for use with pressurized Oxygen To remove this placard, the applicant should go through a Major Change application process with EASA.”</i>	Proposed wording : <i>“When provisions for carriage of oxygen bottles (i.e. bottle rack alone) are certified, it should include the appropriate placard: “Provisions only. Not certified for use with pressurized Oxygen” To remove this placard, the applicant should go through a Major Change application process with EASA to certify the oxygen bottle system.”</i>	Requested	Not Accepted	Thank you for your comment. EASA considers it as implicit that: a) The Major Change to Type Certificate substantiation process will cover the Oxygen bottle. b) Applicants for such Major Change will note and consider ‘CM-ECS-001 Minimum qualification standards for oxygen cylinders used on board aircraft’ as per the references in subject CM-CS-012.

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4	Bombardier	Section 3.2	6 of 8	The following statement needs improvement (double-negative): <i>“If a passenger or crew member is not able to carry by him-/herself, a medical oxygen cylinder, (which is brought on board either on a stretcher or by a passenger), it cannot be considered as a loose item that can be safely stored without particular provisions.”</i>	It is understood that relatively large oxygen bottles that can be carried on board by a person do not require provisions for securing them; while dedicated portable oxygen bottle stowage provisions may not be required, items of mass in the passenger compartment must be secured by some means and the guidance should emphasize this.	Recommended	Partially Accepted	Thank you for your comment. The comment is partially accepted. An improved wording was implemented in the post consultation version of subject CM. General remark: Guidance regarding the consideration of oxygen under operator responsibility is provided on the EASA Webpage through reference to Frequently Asked Question on Dangerous Goods (the link will be active in the final published version of the CM). It is currently not considered to provide additional guidance to operators. The suggested resolution may not cover all installation aspects (with or without stretcher) In contrast, in case of a Major Change application process with EASA, the suggested aspects are part of standard installation requirements per part 25.
5	Bombardier	Section 3.2	6 of 8	Additional information should be provided within the CM and not by using links to FAQ items, especially if the hyperlinks don’t work.	Recommended statements in lieu of “Q2: What are the rules concerning the carriage of portable air concentrators (POC) on board? Can they be used during the whole flight?” Portable oxygen concentrators (POC) should be treated as PEDs and can be used during the whole flight provided there is a means to secure them during takeoff, landing and periods where turbulence necessitates they be secured. The means to secure the POC should allow the equipment to be used when the patient is seated or lying on a stretcher. The oxygen supply hose should be routed such that it does not pose a hazard to the patient or other persons during normal operations and emergency egress.	Recommended	Noted	Thank you for your comment. It is not considered good practice to duplicate information in multiple places. Guidance regarding the consideration of oxygen under operator responsibility is provided on the EASA Webpage through reference to Frequently Asked Question on Dangerous Goods (the link will be active in the final published version of the CM). It is currently not considered to provide additional guidance to operators. The suggested resolution may not cover all installation aspects (with or without stretcher) In contrast, in case of a Major Change application process with EASA, the suggested aspects are part of standard installation requirements per part 25.
6	Bombardier	Section 3.2	7 of 8	The proposed placard text needs to be more clear: <i>“Provisions only. Not certified for use with pressurized Oxygen”</i>	It seems unreasonable that stowage provisions would be limited to depleted oxygen bottles only and if this is the case then the text should be modified to limit the stowage of any pressurized bottle (in some cases pressurized air bottles may be carried on board for medical use). It is more likely that the intent is to make clear that medical oxygen equipment is “not certified for use as supplemental oxygen” in the context of the airworthiness standards or operating rules.	Recommended	Noted	Thank you for your comment. It is considered that a placard on a fixture for oxygen bottles in clear view of the user stating ‘Provisions only. Not certified for use with pressurized Oxygen’ is self explanatory. The CM continues to state that ‘To remove this placard, the applicant should go through a Major Change application process with EASA.’ Compliance with requirements for supplemental oxygen is clearly outside the scope of this CM. Please refer to the section of the CM that states: <i>The design of the stretcher installation shall typically comply with the following CS-25 paragraphs:</i> <<..>> <i>§25.1447 Equipment standards for oxygen dispensing units.</i> In addition, section 1.2 ‘References’ mentions CM-ECS-001 - Minimum qualification standards for oxygen cylinders used on board aircraft

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7	Bombardier	Section 3.2	7 of 8	The following proposed statement needs clarification: <i>“There should be assurance that excess drop down oxygen masks are still available in case of decompression if they are otherwise hidden by a stretcher curtain (e.g. for Cabin Attendants moving along the aisle).”</i>	Recommended alternative statement: “Extra oxygen dispensing units and outlets as required by 25.1447(c)(1) must remain accessible to cabin occupants, e.g., curtains surrounding a stretcher must not obstruct Cabin Attendant access to drop down oxygen masks while moving along the aisle.”	Recommended	Partially Accepted	Thank you for your comment. The recommended alternative statement was partially implemented in the post consultation version of subject CM.
8	DGAC	3.2. Guidance for Air Medical Services	7	The placard “Provisions only. Not certified for use with pressurized Oxygen” applied to provisions for carriage of oxygen bottles is not clear: does it mean that the use of pressurized oxygen is forbidden ? Or that the use of oxygen, being not certified, must be done in accordance with the operational regulations under the responsibility of the operator?	Clarify the meaning of the placard “Provisions only. Not certified for use with pressurized Oxygen”.	Recommended	Noted	Thank you for your comment. It is considered that a placard on a fixture for oxygen bottles in clear view of the user stating ‘ <i>Provisions only. Not certified for use with pressurized Oxygen</i> ’ is self explanatory. The CM continues to state that ‘ <i>To remove this placard, the applicant should go through a Major Change application process with EASA.</i> ’ In contrast, the guidance regarding the consideration of oxygen under operator responsibility is provided on the EASA Webpage through reference to Frequently Asked Question on Dangerous Goods (the link will be active in the final published version of the CM)
9	DGAC	3.2. Guidance for Air Medical Services	7	The memo draws attention to the installation of medical oxygen system components in relation with engine, APU or rotor burst area, and to the necessity of fire extinguishers in the proximity of oxygen installations. The same precautions could be taken with installation provisions for oxygen bottles, in order to avoid having provisions installed in engine, APU or rotor burst impact areas or without any fire extinguisher in the proximity, which would make them useless as oxygen systems could not be installed.	<i>Installing medical oxygen system components or provisions for carriage of oxygen inside an engine or APU rotor burst impact area should be avoided.</i> <i>Consideration should be given for additional fire extinguishers if not already in the proximity of the oxygen installation or provisions for carriage of oxygen.</i>	Not requested	Accepted	Thank you for your comment. The additional precision is appreciated, the CM text was updated accordingly.
10	Turkish Technic Design Organization A. Furkan Ibrahimoglu	Section 3.2	6	As TTDO, we have looked for the definition of the term “loose item”. But we have yet to find a clear definition in EASA publications although there is some information in FAA AC 25-17A. The definition of the term “loose item” is unclear.	Could EASA give the definition of the term and the source of the information about “loose item” ?	Recommended	Not Accepted	Thank you for your comment. The intent of the CM update was to provide guidance regarding the consideration of oxygen under operator responsibility (as loose item). Reference to Frequently Asked Question on Dangerous Goods is provided (the link will be active in the final published version of the CM) Otherwise there may be a wide variety of loose items which is not intended to be addressed in context of this particular CM dealing with Air Medical Services (only).

* Please complete this column using the drop-down list