

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	UK CAA	General	General	The UK CAA fully supports this Equivalent Safety Finding and believes that it will establish practical and enhanced Category A take-off paths.	n/a	Yes	--	Noted	Thank you for this positive feedback
2	UK CAA	2	2	The alternative procedure is supported but a small improvement in the proposed text is suggested. It is recommended to include the possibility to continue the climb whilst accelerating thereby potentially providing more obstacle clearance earlier.	Amend paragraph 2 as shown: 2. Once the defined residual amount of 2 min OEI power is reached, the rotorcraft is then accelerated to a speed of V_Y in climbing or level flight;	Suggestion	--	Not accepted	In the current requirement, between the 2 climb segments a level flight or positive RoC acceleration phase is foreseen to reach the climb speed selected for the second segment. It is not necessary to clarify this aspect through this ESF.
3	UK CAA	Appendix A, Sub-paragraph (c)	4	The focus here is rightly on obstacle avoidance and is especially appropriate for congested area operations. However, we believe sitting at V_{toss} is never the best position in terms of aircraft handling and as soon as 200' is achieved the aircraft should continue to be climbed at 2 min power but also accelerated to achieve V_Y using all the residual 2 min power. That is certainly a safer IFR speed as it is all too easy to lose speed when climbing at V_{toss} . The ESF should perhaps widen its guidance and focus on power management as indicated.	Amend sub-paragraph (c) as shown: (c) It is demonstrated that the alternative procedures can be flown without the need for exceptional piloting skill in maintaining an attitude coincident with V_{TOSS} whilst using the OEI counter as a reference to determine the time to start the acceleration from a speed of V_{TOSS} to V_Y ."	Suggestion	--	Not accepted	The ESF objective is to allow a higher height than the only one (200 feet above the takeoff surface) that is reported at para 29.1587 (a) (6). All the rest of the profile is left intentionally unchanged.
4	Sikorsky	Appendix A,		This predefined residual amount of the 2 min OEI power rating is recognized by the flight crew by means of the OEI counter implemented in the MFD #2, when 7/8 of the 2 min OEI counter is filled."	a. Rather than "7/8 th of the 2 min", state " 105 seconds ". b. The procedure should be modified to state that " <i>This predefined residual amount of the 2 min OEI power rating is recognized by the flight crew by means of the OEI counter implemented in the MFD #2, when no more than 105 seconds of the 2 min OEI counter is filled.</i> "	Suggestion		Not accepted	This information has been removed from the ESF with the intent to permit different monitoring possibilities or designs that allow the applicant to show compliance with the ESF and all other requirements
5	Sikorsky	Appendix A,		The ELOS procedure should specifically identify that the residual amount of OEI power shall be sufficient to allow the aircraft to accelerate from V_{TOSS} to V_Y in level flight.		Suggestion		Accepted	This comment has not been considered in Appendix A but it has been included in bullet point 1 page 2: "The climb at 2 min OEI power ends when a predefined height above 200ft ATS, or at a height of 1000 ft ATS - whichever occurs first - is reached making sure that at such a height there is always enough residual time, within the 2 min OEI rating, to accelerate from V_{toss} to V_Y "

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