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1	*Embraer S.A.*	IDENTIFICATION OF ISSUE	1	Most of effective actions for firefighting an overheated PED may rely on operational aspects and procedures. Concerning the aircraft design aspects, a few additional precautions could be assessed like providing a suitable place to hold an overheated device with appropriate placard; provide adequate emergency equipment; or investigate potential proximity with critical systems.	EASA should clarify which actions are expected to Operators and which are expected to OEMs, if any.	Recommended	Not Accepted	EASA is of the opinion that there must be instructions issued at the design level to prompt the development of specific procedures at the Operator level and cater for the inclusion of the relevant information into the OPS documents. The intent of SC 1 is to introduce at aircraft design level the relevant instructions needed to support the development by operators of effective procedures to fight battery fires. Operators are expected to develop their procedures based on the instructions defined in the design certification process and taking into account the specific features of the cockpit layout of the aeroplanes they operate. No change will be introduced in the special conditions.
2	*Embraer S.A.*	Special Condition 1)	3	SC 1, although OEMs could be requested to provide general instructions for firefighting on their aircraft models, effective actions will be on Operator's scope, since each operator will have their own procedures and training methods for flight and cabin crew, according to their aircraft flight deck configuration.	Only for consideration on the scope of emergency procedures expected from OEMs. In addition, a standardized method or guidance, if any (i.e. proposed videos to be issued by the FAA as announced in the International Aircraft Systems Fire Protection Forum), should improve firefighting effectiveness.	Not requested	Noted	See response to comment 1). No change will be introduced in the special conditions.
3	*Embraer S.A.*	Special Condition 2)	3	SC 2, as said on previous paragraph, adequate training will be established and provided by each operator, with no direct action from OEMs. Compliance with this special condition should follow Operator's procedures and training methods applicable for their aircraft flight deck configuration.	Remove SC 2) or clarify this action is under Operators' responsibility.	Recommended	Not Accepted	See response to comment 1). No change will be introduced in the special conditions.
4	*Embraer S.A.*	Special Condition 3)	3	SC 3, all emergency equipment provided by OEM in the aircraft TC is readly accessible and placarded; and complies with applicable regulation for emergency equipment installation and cabin safety aspects. Compliance with this special condition should follow Operator's procedures and training methods applicable for their aircraft flight deck configuration.	Specify required actions to OEMs.	Recommended	Partially Accepted	The intent of SC 3 is to minimize that the time needed to retrieve the equipment and start the fire-fighting procedure, in case a battery fire occurrs on the flight deck. The text of SC 3 has been been updated to better express the intent of the special condition. See also the response to comment 1).
5	*Embraer S.A.*	Special Condition 4)	3	SC 4, it may not be practical OEMs to establish a test method to support the fire hazard assessment, or determine a representative lithium battery fire, due to the quick and constant evolution of PEDs and potential devices for mitigation, containment, or firefighting. Compliance with this special condition should follow Operator's procedures and training methods applicable for their aircraft flight deck configuration.	Remove text where it says "supported by test evidence".	Recommended	Not Accepted	The evaluation of the design of stowage compartments available on the flight deck needs to be based on test evidence. This does not mean that testing the specific design of each stowage compartment is required but rather that test data should always be provided in support of the evaluation of the performance of the compartment in a battery thermal runaway scenario. No change will be introduced in the special conditions.

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6	*Embraer S.A.*	Special Condition 5)	3	SC 5, suitability for PED stowage is dependent on the type of PED as well as potential risks associated with. Stating allowance in a placard is not practical since an indication for stowage locations and mounting brackets may become possibly invalid for some future PED/battery technology.	Change text to requiring placards only on locations that are not suitable/safe for PED stowage considering the rationale bellow: As mentioned in Embraer Comment NR 4 all emergency equipment provided by OEM in the aircraft TC is readily accessible and placarded. According to the aircraft flight deck configuration and general requirements for marking and placards it will be defined proper placard installation: whether specific area is suitable for PED stowage or is unsafe for PED stowage according to above SC4.	Recommended	Not Accepted	The change proposed by the commenter does not result in an increased level of safety but rather reduces the level of flexibility for the designer. The MOC to the special conditions are not subject to public consultation. No change will be introduced to the MOC to SC 5.
7	*Dassault Falcon Service*			How do you plan to mitigate the risks of PEDs present in the cockpits for planes that do not have any modifications planned for them ? Number of crews fly with their I-Pad on their knees or recharging their phones via a portable battery. (AMC2 NCC.GEN.131(b)(2) Use of electronic flight bags (EFBs) : explains Pilots have to ensure there is a fully charged backup battery on board)	2 solutions: - The regulations should be more operational to take into account aicraft without specific configuration for PED - All TC holder have to revise the AFM and OSD to include this SC in all the TCDS (Including airplanes in service)	Requested	Noted	EASA has launched an investigation to identify the need for continuing airworthiness action on Large Aeroplanes from EU TC Holders and foreign TC Holders for which our bilateral partners are the State of Design Authority. The outcome of such investigations confirmed that: - a potential hazard exists on the majority of aircraft types - and in such case mandatory action would be required from the TCHs to define the necessary emergency procedures, training, equipment and improvements of the flight deck design as defined in Special Condition ref. SC-G25.1585-01. Therefore, it is expected that the SC will become part of the type certification basis for most if not all of the EU and Non-EU large aeroplanes aircraft types and introduced in the associated TCDSs accordingly.
8	*Dassault Falcon Service*			Has FAA published an equivalent Special condition ? How FAA will take into account the request of this special condition ? Be advised, we have customers who have already explain to DFS they will install their next changes for PED with FAA approval if this SC induces a Major change.		Requested	Noted	EASA has timely informed the FAA about the publication of the special conditions. EASA expects other Aviation Authorities to establish similar measures.
9	*Dassault Falcon Service*			Even if TC holder has revised the AFM to include SC1, Special condition requires the changes should be Major despite the fact the change is minor (installation of USB outlet for example).	Could you transfer this special condition to a certification memorandum ? If not, the CS25 has to be updated as soon as possible to integrate request included by this special condition.	Requested	Not Accepted	The introduction of the special conditions in the certification basis of an already certified aircraft type will need to be processed in the context of a major design change. Once the special conditions are referenced on the aircraft TCDS, design changes to which the special conditions are applicable may be classified following the guidance of GM 21.A.91. Later introduction of the special conditions into CS-25 is envisaged.
10	*Dassault Falcon Service*	SC 2	3	For aircraft without OSD, how STC holder can do?		Choose an item.	Noted	See response to comment 3).

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11	*SIRIUM AEROTECH*	MEANS OF COMPLIANCE	4,5	The proposed SC makes reference to "placing the PED in a safe stowage" (MOC 1) and identification of compartments suitable or not for PED storage (MOC 5). More guidance about the requirements for such locations would be appreciated. This is, the necessary test to be performed (i.e. 45º, V60?) to the walls of such compartments or other requirements. Also, there are available in the market bags made of fire resistant material with the aim to keep a PED fire contained inside. I suggest to clarify if this solution is acceptable and, if so, the tests necessary and requirements for the textiles used.	Further clarification of the requirements and definition of "safe stowage". Further clarification of the requirements and suitability of textile bags available in the market for PED containment.	Recommended	Not Accepted	The design of stowage compartment installed on the flight deck must be shown to meet CS 25.853(a). The intent of SC 4 is to mandate an additional assessment of the performance of the stowage compartment based on data generated in tests in which the thermal runaway of a lithium battery is simulated. No change will be introduced in the special conditions.
12	*KLM Royal Dutch Airlines*			KLM supports the proposed Special Condition, but would like to suggest to EASA that, for practicle reasons, small PEDs, for example (smart) watches, are excluded from the requirements of the Special Condition. KLM agrees that larger :PEDs, such as iPADs or laptops, are subject to the requirements of the proposed SC.	KLM would like to propose for practical reasons a maximum weight in grams Lithium per PED that the crew can bring onboard and a total weight in grams Lithium that may be transported on the Flight Deck.	Requested	Accepted	EASA agrees that the fire threat that is posed by lithium/cells that power small PEDs can be considered outside the scope of the special conditions. The text of the MoC to SC 1 and SC 4 has been modified to clarify that a possible means of compliance with the special conditions in question consists in prohibiting the carriage on the flight deck of lithium batteries that are not part of the aircraft type design and that have a capacity exceeding 2 Wh.
13	*UK CAA*	Identification of issue	2	The text that precedes the extract of CS 25.1585(3)(3) explains that a lithium battery fire in proximity to critical systems poses a potentially catastrophic hazard and mentions the oxygen lines. The proximity of oxygen lines poses a risk that may make any fire harder to extinguish and more likely to spread. However, there are many systems in the aircraft cockpit/flight deck that perform a critical function and it could be worthwhile to clarify the range of effects, any of which could be catastrophic • an effect on the oxygen system, which may be affected to the extent that it increases the oxygen feed to the fire, and; • an effect of a fire in proximity to other critical aircraft systems, e.g. flight controls, that may be lost as a result of the fire. The addition of "flight controls" is added as an example of systems that if lost could directly lead to a catastrophic loss.	Paragraphs amended as follows (*added text*) On certain aircraft, the flight deck storage boxes may be located in close proximity to critical systems, such as *flight control and* oxygen lines routed on the flight deck. In case of a battery/cell thermal runaway, the flight deck could become potentially affected by generation of heat, smoke and flames, as well as by explosions. Additionally, a battery fire affecting critical aircraft systems (e.g. *flight controls and* oxygen lines) may be catastrophic.	Requested	Accepted	The Identification of Issue has been modified as requested by the commenter.

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14	*Lufthansa Techik*	General	-	It is assumed that this SC will be applicable for any change to storage facilities inside the flight deck, comparable to CRI F-GEN-10 (Non-rechargeable Lithium Batteries Installations). There will be an additional burden for certain "simple" changes if SC is not included in the TCDS since those changes have to be classified (initially) as a major change as the SC need to be added to the certification base.	The SC should be included into the certification base of the TCDS.	Recommended	Accepted	See response to comments 7) and 9).
15	*Lufthansa Technik*	General	-	Aircraft in service already providing several kinds of stowages certified by TC or STC. Q: Is there in general a review by the initial applicant required (e.g. like introduction of EWIS) for those stowages when SC is in place?	Clarification how existing stowage compartments should be handled.	Requested	Not Accepted	As identified in the response to comment #7, EASA has already launched an investigation of the actual potential hazards with the EU and Non-EU TC Holders of our bilateral partners. This investigation might be extended to STC Holders at some point in time. See also the response to comment #7.
16	*Lufthansa Technik*	SC 4)	3	If mounting brackets are installed in conjunction with portable EFB system, is there a review required in context of this SC when adapting an already approved change, ether if the mounting is not touched?	Clarification required	Requested	Noted	The special conditions will be applicable to STC projects affecting the configuration of a flight deck design originally compliant with the special conditions. EASA does not intend to apply the special conditions to STC projects, unless: - the special conditions are referenced on the TCDS of the aircraft to which the STC is applicable or - the subject change would extensively affect the flight deck design with respect to the potential hazard of lithium battery fire on the flight deck. See also the response to comment #15.
17	*Lufthansa Technik*	MOC to SC 1 a.	4	MOC to SC 1 a) is including the following: *"…or may be in the personal belongings of the flight crew.."* This would include any kind of stowage or hook within the flightdeck, nevertheless it is intended to stow a PED or not (e.g. like the closet or flight back belt restraint in flight deck).	Clarification how to proceed with those types of stowages is required, since the personal belongings of the crew represent a fire load already accepted within the initial certification process and are not under control of a susequent applicant.	Requested	Not Accepted	The special conditions have been developed to address a fire threat that has not traditionally been evaluated to an acceptable extent in type certification projects. The design of the flight deck will need to be reviewed to identify suitable locations for the stowage of PEDs, power banks and spare batteries. No change will be introduced in the special conditions.
18	*Lufthansa Technik*	MOC to SC 5	4	For stowage locations and mounting brackets which are not explicitly marked it must be easily recognizable by the crew whether they are suitable or not for equipment comprising Lithium batteries. Consequently, the marking requirement should be determined by the SC in a straight and consistent manner. This is not ensured by the current wording of SC 5 in combination with the MOC to SC 5.	It is proposed to change the text of MOC to SC 5 as follows: "Stowage locations and mounting brackets inside the flight deck that are determined to be suitable for PED stowage according to above SC 4) must be identified by a placard *"Suitable for equipment containing lithium battery*" or any other equivalent text found acceptable by EASA."	Requested	Not Accepted	See the response to comment 6). No change will be introduced to the MOC to SC 5.

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19	*Lufthansa Technik*	MOC to SC 5	5	MOC to SC 5 is proposing the following text "…suitable for equipment containing lithium battery" It can be assumed that the majority of users have no detailed knowledge of the battery technology of the device used. To avoid misiterprtation all kinds of internal power source used by PEDs should be addressed.	Adaption of wording to reflect PEDs with an internal power source: "… equipment containing a battery"	Recommended	Not Accepted	The special conditions address the risk of having a lithium battery fire on the flight deck.
20	*ATR*			Could EASA clarify the safety objectives of this special condition in term of applicability (applicable for new MOD, STC, TC, production aircraft or applicable for existing certified product and retrofit) and entry into force ?		Requested	Noted	See the response to comments #7, #15 and #16.
21	*ATR*			Could EASA confirm that the PED definition is the one provided in Air Operations regulation within Annex I - Definitions for terms used in Annexes II to VIII ?	It is proposed to add tbe below PED definition (given by the AirOps) in the Special Condition: 'portable electronic device (PED)' means any kind of electronic device, typically but not limited to consumer electronics, brought on board the aircraft by crew members, passengers, or as part of the cargo, that is not included in the configuration of the certified aircraft. It includes all equipment that is able to consume electrical energy. The electrical energy can be provided from internal sources such as batteries (chargeable or non-recharge or non-rechargeable) or the devices may also be connected to specific aircraft power sources'	Requested	Accepted	The special conditions have the objective to address the fire scenario originating from the thermal runaway of a lithium battery that is not part of the aircraft design. Lithium batteries may be included in PEDs transported on the flight deck by crew members. In addition to PEDs, as defined in the AirOps, also power banks and spare batteries may be transported on the flight deck. The special conditions, including their title, the related means of compliance and text of the identification of issue, have been revised accordingly.
22	*ATR*	§4	3	In the case where the emergency procedure recommend to remove the PED from its location (PED mounting bracket, personal suitcase…) to store it in a special location in case of PED lithium battery runaway, is it necessary to make a fire hazard assessment on the primary location (PED mounting bracket, personal suitcase location…)? If yes, which demonstration are needed, and which thermal runaway data do we have to consider? Do we have to consider the flight crews' clothing pockets for mobile phone, e-cigarette… ?		Recommended	Noted	Every stowage location that is suitable to stow PEDs on the flight deck, including EFB mounts, should be identified and marked accordingly. This applies also to the location that the commenter identifies as "primary". See also the response to comment 12).
23	*ATR*	MOC to SC4	4	The guidance should define the test sample of PED to be considered for test .	PED classification shall be necessary, for example standard UL5800 define a PED classification depending on battery capacity	Requested	Partially Accepted	The test conditions will have to be discussed in the context of the certification projects. EASA intends to allow flexibility for the applicants in the definition of the setup and procedures of the tests that will be run to support the demonstration of compliance with SC 3. The MOC to SC 4 identifies criteria, i.e. duration of the event and minimum peak temperature, that the proposed test conditions should meet. The text of MOC to SC 4 has been modified to clarify that test conditions should be agreed with EASA.

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24	*ATR*	MOC to SC4	4	Does the PED battery temperature of 760°C have to be considered during the 2 minutes? The guidance should define the temperature runaway curve to be considered.		Requested	Partially Accepted	See also the response to comment 23). The text of MOC to SC 4 has been modified to clarify that test conditions should be agreed with EASA.
25	*ATR*	MOC to SC4	4	The guidance should define the smoke and toxic gases runaway curve and quantity. There is a need also to define the type of gases to be considered to evalute their toxicity (potential associated acceptable exposure time)		Requested	Not Accepted	The type and quantity of toxic gases released in a battery fire depends on the chemistry, and more in general, on the design of the battery. The concentration levels of toxic gases in the flight deck also depend on the flight deck volume and on the settings of the environmental control system. In addition, the use of protective breathing equipment by flight crew members should be considered. EASA does not intend to provide any detailed prescriptions on how to conduct the assessment of toxicity of the products of a thermal runaway event. No change will be introduced to the MOC to SC 4.
26	*ATR*	MOC to SC4	4	The guidance should define the corrosive leakage (quantity, temperature…).		Requested	Not Accepted	The assessment of corrosive leakage depends on the chemistry, and more in general, on the design of the battery. EASA does not intend to provide any detailed prescriptions on how to conduct the assessment of corrosive leakage that may be associated to a battery thermal runaway. No change will be introduced to the MOC to SC 4.
27	*Airbus*	WHOLE	WHOLE	The definition of the PED is an element of clarification: EASA should ensure consistency of the usage of the term 'PED' in the text	The meaning of PED could be the one given by the AirOps: *'portable electronic device (PED)' means any kind of electronic device, typically but not limited to consumer electronics, brought on board the aircraft by crew members, passengers, or as part of the cargo, that is not included in the configuration of the certified aircraft. It includes all equipment that is able to consume electrical energy. The electrical energy can be provided from internal sources such as batteries (chargeable or non-recharge or non-rechargeable) or the devices may also be connected to specific aircraft power sources'* - or if necessary give new definitions as needed.	Recommended	Accepted	See the response to comment 21).

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28	*Airbus*	SC4	3	SC4 requires that a fire hazard assessment is supported by test evidence. As noted in the "IDENTIFICATION OF ISSUE": Page 1 - "PEDs include but are not limited to mobile phones, tablets, laptop computers, power banks, e-cigarettes and spare batteries." Page 2 - "…or devices carried by the flight crew for personal convenience" Any test would be nebulous given the variety of PED (and consequently lithium battery chemistry, size and energy content) that could potentially be placed in the stowage compartment. e.g. an e-cigarette thermal runaway effect could be markedly different from a power bank. Note: The MoC for SC4 (Page 4), provides no guidance on how to accomplish the testing.	Specify minimum level of testing that would be considered adequate given the variety of PED that could be on the flight deck.	Requested	Partially Accepted	See the response to comment 23).
29	*Airbus*	SC4	3	It is unclear what a test on a bracket is intended to accomplish unless the goal is to?	Add clarification to SC4 or associated MoC	Recommended	Accepted	The content of MoC to SC 4 has been updated to include more guidance on the level of performance that mounting brackets are expected to have.
30	*Airbus*	SC1	3	SC 1) does not mention that any emergency demonstrate that the bracket can support for example an EFB overheat/ fire until the overheat is addressed equipment part of the emergency procedures must be shown to be suitable for lithium battery fire considering the different threats (i.e. heat, smoke, fire and explosion). SC 3) only covers readily access of such equipment.	Add in SC 1) or SC 3) that emergency equipment required to effectively follow the emergency procedures must be shown to be suitable for lithium battery fire.	Recommended	Accepted	SC 3 has been updated as proposed by the commenter.
31	*Airbus*	Overall	Overall	The applicability of the SC is not clear and the resolution of the comment depends on EASA safety objective (retroactively, forward fit, etc)	The applicability of the SC needs to be explained	Recommended	Noted	See the response to comment 7).
32	*Airbus*	MoC to SC5	4-5	The placard , if needed, has to indicate the area where PED can be placed. Highlighting the area where PED cannot be placed contradicts the security objectives as it may point out a vulnerability in the cockpit.	Only keep the placard: "Suitable for equipment containing lithium battery"	Recommended	Not Accepted	See the response to comment 6).

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33	*Aeroconseil 21J.039*	Last sentence	2	Clarification is deemed necessary to adress design changes that are limited to structural mounted provision for C-PEDs. C-PED battery design and potential failure mode is in detail known to those who desire to install it.	Operational Manual Supplements should identify the requirements to be met (CAT.GEN.MPA.140 and/or this SC), when lithium batteries are port of the later installed C-PED on this structural provision.	Requested	Not Accepted	C-PEDs and PEDs are considered equivalent in terms of battery fire threat. The special conditions do not differentiate C-PED from other PEDs. No change will be introduced to the MOC to SC 5.
34	*Aeroconseil 21J.039*	§4)	3	"[..]fire hazard assessment supported by test" should be clarified	"[..]fire hazard assessment supported by test of corresponding emergency procedure (e.g. access for application of cooling liquids, C-PED jettison or removal and relocation to determined least critical place in flight deck or cabin).	Requested	Not Accepted	The test evidence mentioned in SC 3 is related to the performance of stowage compartments and mounting brackets. Effectiveness of procedures is addressed in SC 1. No change will be introduced to the MOC to SC 5.
35	*Aeroconseil 21J.039*	MOC to SC1 a.	4	Adressing all possible stowage positions of crew personal belongings is deemed impractical.	Stowage positions as declared suitable by MOC to SC5 should be addressed. Operational Manual Supplements should request that other stowage positions are addressed by those operating with C-PEDs.	Recommended	Not Accepted	All stowage compartments in the flight deck should be reviewed. If not reviewed they should be marked as not suitable for battery stowage. No change will be introduced to the MOC to SC 5.
36	The Boeing Company	Requirements incl. Amdt	1	With the prevalence of various types of operationally-approved devices brought on board the flight deck, recommend application of the SC to Part 121 approved stowage devices and mounts to cover similar concerns for those items.	Consideration of adding Part 121 applicability	Recommended	Not Accepted	By definition the special conditions are going to be included in the certification basis applicable to aircraft design certification projects affecting the flight deck of large aeroplanes. The special conditions are not related or linked to any operational rules.
37	*Dassault*	General		Please clarify the applicability of such SC : date of effectivity, effectivity only for new TC or significant changes ? retroactivity asked for in service a/c fleet ? what is the condition to trigger this SC		Requested	Noted	See the response to comments #7, #15 and #16.
38	Dassault	General		Further to CARI 25-09, Dassault Aviation put in place action plan to prevent such thermal runaway hazard in cockpit. Modifications have been approved to install PED thermal runaway containment kit on a/c. Would this SC jeopardize the changes already approved at OEMs level and would necessitate to redesign novel solution to match with latest EASA expectations ?		Requested	Noted	The special conditions have been developed to address a fire threat that has not traditionally been evaluated to an acceptable extent in type certification projects. It is expected that the SC will become part of the type certification basis for most if not all of the EU and Non-EU large aeroplanes aircraft types and introduced in the associated TCDSs accordingly. If needed, TC holders will have to modify the design of the flight deck in order to demonstrate compliance with the special conditions. The individual case(s) of aircraft types for which Dassault Aviation is the TCH will be analysed by the EASA certification team in charge of that programme.
39	Dassault	MOC to SC1	4	Dassault Aviation would like to remind that AFM is not the only way to manage the crew awareness of such hazards and would like to alleviate the SC by given the possibility to handle the topic with alternative means	Give the possibility to handle the topic with alternative means	Requested	Not Accepted	EASA would like to highlight that the request for inclusion of emergency procedures in the AFM has been included in the MOC to SC 1 and not the SC itself. The means identified in MOC to SC 1 is just one possible means that is agreeable by EASA. See also the response to comment 1).

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40	*Dassault*	MOC to SC1 (e)	4	Dassault Aviation is not in favor to mandate a Land Asap each time a runaway situation appears. SC needs to be alleviated and to offer the possibility to pursue the mission in case the thermal runaway is declared under control		Requested	Not Accepted	The special conditions do not mandate landing as soon as possible in case a battery fire occurs on the flight deck. However, the MOC to SC 1 clarifies that the emergency procedures should make clear whether it is required for the aircraft to land as soon as possible.
41	Dassault	2)	3	Dassault Aviation would like to remind that crew training is not under OEMs responsibility. Adequate hook with OSD-FC (OSD-CC when applicable) needs to be better clarified in this SC.		Requested	Not Accepted	A TC change approval or STC can be issued before compliance with the OSD certification basis has been demonstrated. However, the OSD needs to be approved before the data is used by a training organisation for the purpose of obtaining a European Union (EU) licence, rating or attestation, or by an EU operator. The use of OSD for aircrew training programmes is mandated and regulated in EASA Member States by Regulations (EU) 965/2012 and (EU) 1178/2011). However, other States may or may not use these data. See also the response to comment 1).
42	Dassault	General		Again, OEMs responsibility is also questionable : is it not the operator responsibility to match with operational regulation vs use of PED 's in cockpit and / or passenger compartment ?		Requested	Not Accepted	See the response to comment 1).
43	*Dassault*	MOC to SC4	4	Dassault Aviation would like to have further clarification on the fire hazard assessment and the associated MoC to be produced : how to manage the fire assessment to cover multiple PED manufacturers / versions / material… Are alternative MoC (analysis) acceptable at EASA level instead of tests ?	Clarify if alternative MoC are acceptable	Requested	Partially Accepted	See the response to comment 23).

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