

EASA – Equivalent Safety finding (ESF) "Indication removal from Primary Flight Displays during ground phases" ESF-F25.1303-01 - Comment Response Document

| Comment | | | | Comment summary | Suggested resolution | From the commenter point of view a | EASA | EASA response |
|---------|-------------------------------------|---------------------------|------|---|--|--|------------------------|---|
| NR | Name of the organisation commenting | Section, table, figure | Page | | | modification of the published text is*: -Not requested; -Recommended; -Requested | comment disposition | |
| 1 | Embraer S.A. | General | N/A | Analyzing the applicable operational requirements, the same indications required in 25.1303 are also required in the operational requirements CAT.IDE.A.125(a)(1)(iii) to (vii), NCC.IDE.A.120(a)(3) to (4) and NCC.IDE.A.120(b)(1)(i) to (iii). Embraer understands that the operational requirements become applicable when the aircraft enters into service, therefore, become applicable from pushback, including taxi, as considered in this Equivalent Safety Finding ESF-F25.1303-01. During the taxi, the ESF guarantees compliance with the requirement 25.1303, however it is not clear how the operator would comply with the operational requirements mentioned above? Is it expected the operator request an Operational Exemption? | Embraer does not have a suggested resolution, we just would like to clarify the authority's understanding of our question. | Not requested | Noted | Thank you for your comment. EASA acknowledges the comment and confirms that no Exemption to the OPS rules (CAT.IDE.A.125(a)(1)(iii) to (vii), NCC.IDE.A.120(a)(3) to (4) and NCC.IDE.A.120(b)(1)(i) to (iii)) is required. Basic Regulation (Regulation (EU) 2018/1139) ANNEX V Essential requirements for Air Operations §5.1 reads: An aircraft must be equipped with all navigation, communication and other equipment necessary for the intended flight, taking account of air traffic regulations and rules of the air applicable during any phase of the flight. AMC1 CAT.IDE.A.125 & CAT.IDE.130 and AMC1 NCC.IDE.A.120 & NCC.IDE.A.125 read: INTEGRATED INSTRUMENTS (a) Individual equipment requirements may be met by combinations of instruments, by integrated flight systems or by a combination of parameters on electronic displays, provided that the information so available to each required pilot is not less than that required in the applicable operational requirements, and the equivalent safety of the installation has been shown during type certification approval of the aeroplane for the intended type of operation. Based on the above, mentionned requirements are intended for fligh phases only. In addition, a provision in AMC associated to those requirements allows operators to use certified data ("equivalent safety of the installation has been shown during TC approval") in order to show compliance. Based on the above the text will not be changed. |

^{*} Please complete this column using the drop-down list

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