

COMMENT RESPONSE DOCUMENT

EASA CRD of Special condition SC-F25.1445-01 "Installation of a Therapeutic Oxygen System" [Published on 06 January 2020 and officially closed for comments on 27 January 2020]

Commenter 1: Boeing

Comment # 1

		COMMENT #1	
Type of comment (check one)	Non-Concur	Substantive X	Editorial
Affected paragraph and page number	Page:3 Paragraphs: 1.ii		
What is your concern and what do you want changed in this paragraph?	THE PROPOSED TEXT STATES: 1 ii iii. A common source of supply with means to separately reserve the minimum supplemental supply required for the passengers." REQUESTED CHANGE: 1 iii. A common source of supply with means to separately reserve the minimum supplemental supply required for the passengers. This means may include monitoring procedures by the operator based on the minimum supplemental supply for the planned route, occupant count and segment of flight."		
Why is your suggested change justified?	JUSTIFICATION: The intent of our comment is to clarify that the use of operational procedures is an acceptable means to assure adequate oxygen is available for supplemental purposes. We also wanted to make clear that the reserve quantity of supplemental oxygen can vary based on planned route, occupant count and segment of flight.		

EASA response: EASA partially agrees.

It is acknowledged that the Minimum reserve for supplemental supply is depending on the each flight operation, and the quantity will vary based on planned route, occupant count and segment of flight.



In addition, depending on the Therapeutic oxygen system design, additional physical means might be required, to ensure the reserved quantity of supplemental oxygen is not jeopardized by the use of therapeutic oxygen if connected to the same oxygen source. EASA agrees to update the Means of Compliance to consider this comment. The text in the special condition will remain unchanged.

The AMC will be updated as follow:

"In showing compliance to SC F25.1445-01(1)(ii) for designs with a common source of oxygen, the "means" to separately reserve the minimum supplemental supply required for the passengers, should include physical means (i.e isolation valve) and may include monitoring procedures by the operator based on the minimum supplemental supply for the planned route, occupant count and segment of flight"