

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	Boeing Commercial Airplanes	Section 1a	3	The applicability restriction identified in Section 1a to the take-off phase only (i.e., cannot be set in approach and landing flight phases), does not appear to be necessary to establish an ESF to CS 25.1563. It is also noted that this applicability restriction is not included in the list of compensating factors identified in Section 3.	It is suggested to modify Section 1 to remove the comment about approach and landing, resulting in the following: 1. Applicability This ESF may be applied to large aeroplanes, if: a) Additionl high lift configurations are provided for the take-off phase b) All non-ETOC related VFE are provided on the airspeed placard	Recommended	Noted	Thank you for your comment. The restriction is added simply for clarification. EASA acknowledges the comment, but will not change the text.
2	Boeing Commercial Airplanes	Section 3b	3	Additional clarification is sought for compensating factor 3b due to percieved ambiguity and a potential for multiple interpretations which may be design prescriptive and consequential. One interpretation is that compensating factor 3b is intended to be relevant to the behavior of VFE displayed on the PFD speed scale during flap retraction (i.e., “As soon as the flap lever is moved ...”) since the physical airspeed placard is not dynamic. In this case, if the term ‘configuration attained’ implies the commanded flap lever position during retraction, it may be inappropriate to immediately display the associated higher VFE speed based on the flap lever position while the flaps are still in motion and the aircraft accelerating. Concern may arise if this behavior, 1) is not synchronized with the overspeed warning logic identified in compensating factor 3f resulting in an overspeed warning while the actual airspeed is below the displayed VFE, or 2) the overspeed warning is synchronized (i.e., utilizes the same logic described above) thereby potentially permitting an actual overspeed event without triggering the overspeed warning. It is also observed that these concerns are not unique to ETOC but affected by the ESF. Alternatively, compensating factor 3b could simply be interpreted to require the first flap lever position used following a take-off from the selected take-off position to be provided on the airspeed placard since the PFD speed scale is not mentioned. This would appear to be a more specific requirement than broadly requiring all flap lever position VFE speeds to be provided on the airspeed placard but would not be specifically relevant to ETOC.	It is suggested to clarify the intent of compensating factor 3b and to include consideration of the appropriate displayed VFE and overspeed warning logic as they pertain to flap lever position or actual flap position.	Recommended	Noted	Thank you for your comment. As regards the appropriate VFE displayed on the speed scale and the overspeed warning logic there is no change in the design due to ETOC. EASA acknowledges the comment, but will not change the text.

* Please complete this column using the drop-down list