

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	Transport Canada Civil Aviation	1. Applicability	2	<p>Comment:</p> <p>A clarification or definition of the term system (see highlight) below would be beneficial.</p> <p>A system may be complex or broad in scope. This could make a finding of equivalent safety more difficult.</p> <p>1. Applicability</p> <p>This ESF to CS FCD.425(g) may be applied if</p> <ul style="list-style-type: none"> <li>- type specific pilot training is required for the installation of the same equipment, <b>system</b> or functionality on more than one aircraft type of the same type certificate holder.</li> </ul>	Provide a definition of “system” in the context of this Equivalent Safety finding	Recommended	Not Accepted	Thank you for your comment. EASA does not agree to the comment. EASA believes that the common understanding of “equipment, system or functionality” may cover any element of a product as defined by that product’s type design if it has an effect on pilot type rating training.
2	Transport Canada Civil Aviation	3. Compensating Factors		<p>Adding words in highlight in 3.a and 3.b below will increase consistency with 1. Applicability</p> <p>3. Compensating Factors</p> <p>a. The equipment <b>or system</b> installed on a variant of the same aircraft type or another aircraft type of the same type certificate holder shall:</p> <ul style="list-style-type: none"> <li>- be identical; and</li> <li>- have the same pilot interface; and</li> <li>- be operated according to the same procedures, under normal, abnormal and emergency operations; and</li> </ul> <p>b. The variant of the aircraft type or the other aircraft type from the same type certificate holder on which the equipment <b>or system</b> is installed has no influence on its functionality and perception by the pilot;...</p>	Suggest adding words in highlight in 3.a and 3.b below for consistency with 1. Applicability	Recommended	Accepted	Thank you for your comment. EASA has revised the text adding “ <i>system or function</i> ”.
3	Boeing	2.	2	<p>The proposed text states, “[D]irect compliance to CS FCD.425(g)...”</p> <p>We recommend that the text is revised to clarify the intent. The text seems to mean EASA involvement, but it is not clear this is the intent by the way it is written</p>	We recommend to replace “direct compliance to...” with “EASA involvement regarding...” in order to clarify the intent of the text.	Recommended	Not Accepted	Thank you for your comment. EASA does not agree with the comment. The ESF relates to the literal non-compliance with the text, meeting the intent of the CS.FCD.425(g). It has no link to the EASA level of involvement in the verification of compliance demonstration.
4	Boeing	3.a.	2	<p>Regarding the first item under 3.a., the proposed text states “be identical.”</p> <p>To avoid misinterpretation, we recommend to include clarification about what constitutes identical equipment.</p>	<p>We recommend to replace “be identical” with “have the same manufacturer, model name, part number, software version.”</p> <p>Alternatively, we recommend to define “identical” in CS FCD.105, Definitions.</p>	Recommended	Not Accepted	Thank you for your comment. EASA confirms the commenter’s understanding that “identical” in the current context means that the equipment has the same manufacturer, model name, part number, software version. But EASA also believes that the term “ <i>identical</i> ” is clear enough.

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5	Boeing	3.b.	2	The proposed text states, “perception by the pilot.”  To avoid misinterpretation, we recommend to include clarification about what constitutes “perception by the pilot.”	We recommend to replace “perception” with “...what can be seen, heard, or felt by the pilot. This includes, but is not limited to, visual alerts, aural alerts, and data displayed.”  Alternatively, we recommend to define “perception” in CS FCD.105, Definitions.	Recommended	Partially Accepted	Thank you for your comment. EASA partially agrees with the comment. The text has been amended changing “ <i>perception by the pilot</i> ” with “ <i>pilot interface</i> ”. EASA consider this terminology clear enough in the context.
6	Boeing	3.c.	2	The proposed text in this paragraph shifts responsibility of the T3 evaluation to the type certificate holder. This shift necessitates clarification about the following:  a. What conditions must be met in order for EASA to consider the type certificate holder’s evaluation acceptable?  b. Normally, the EASA OSD expert would be assessing proposed training in the T3 evaluation. When applying this Equivalent Safety Finding, who may be designated by the type certificate holder in lieu of the EASA OSD expert?	Regarding comment (a.), we recommend to provide a list of conditions. For example, “pilot subjects shall not be employees of the type certificate holder.”  Regarding comment (b.) we recommend to list acceptable people in lieu of the OSD expert. For example, an instructor designated to approve completion of a practical skills test.	Recommended	Not Accepted	Thank you for your comment. EASA does not agree to the comment. The assumption behind the ESF is that the T3 test has already been performed, with EASA involvement, on another type or variant. The ESF is not, therefore, related to the EASA level of involvement, but rather to the literal non-compliance with the text, meeting the intent of the CS.FCD.425(g).

\* Please complete this column using the drop-down list