

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	FAA AIR-624	Gen	Gen	The approval of similar systems on part 23 aircraft have been limited to small ranges of authority monitored by the electronic engine control system. The authority range of previous Current Speed Control (CSC) systems has been limited to the trim authority contained in the engine control logic. Permitting CSC authority greater than permitted by the engine control logic would require further evaluation.		Choose an item.	Not Accepted	Thank you for your comment. EASA understands that the commenter has assessed that “further evaluation” would be required in addition to the those identified in this ESF and the assessment of the comment and response below is prepared based on the above understanding It is acknowledged that the CSC has an authority which is beyond the authority of the FADEC (adjustment for stability purpose) as it has an impact at aircraft level to maintain speed. This is especially why these compensating factors are required in addition to what is usually required for a classical FADEC range of authority.
2	FAA AIR-624	Gen	Gen	FAA ELOS findings are for specific aircraft models (Ref. AC 20-166A). This proposed ELOS finding does not list any specific aircraft model and appears to be generic in nature. The FAA has historically not accepted a “generic ELOS” that is applicable to a wide range of aircraft models.		Choose an item.	Noted	Thank you for your comment. In the EASA system, an ESF is raised based on the request of an applicant for their design. EASA can make the ESF more broadly applicable to other products if the defined conditions of that specific ESF allow. In this way the same ESF can be used by other applicants as well with no need of a new public consultation. In this specific case, EASA has found that the ESF can be applied to all aircraft defined in the applicability.
3	FAA AIR-624	Gen	Gen	The current FAA position on granting ELOS findings is to have the applicant step up to amendment 23-64 for the area of change and capture the requirements in an accepted means of compliance. The requirements in an accepted means of compliance would likely match the criteria identified as compensating features. Is EASA planning to propose this change to existing accepted MOCs such as the consensus standards in ASTM F44?		Choose an item.	Noted	Thank you for your comment. The described way to handle cases where the design does not comply with the CS requirements (for Amdt 4 and earlier) is also acceptable to EASA if suitable requirements are available in CS-23 amdt 5. EASA also raises ESF to CS-23 requirements (Amdt 4 and earlier) if so requested by the applicant and if suitable for the specific case. EASA reviews each request and advises the applicant, where appropriate, on the use of CS-23 Amdt 5. In this case, EASA has agreed to raise the ESF also to follow, as validating authority, the decision taken by the primary authority. EASA regularly reviews and provides inputs to ASTM F44 standards based on all available regulatory material (ESF, special conditions, Means of Compliance etc.), depending on the applicability of the ESF and the availability of other ASTM standards addressing this issue.

* Please complete this column using the drop-down list