

ETSO C-135
Deviation Request for CS-ETSO ETSO-C135 applicable
to Transport Aeroplane Wheels and Brake Assemblies
dated 24/10/2003
EASA

Commenter:	UK CAA
Paragraph:	General
Comment:	<p>The rationale for the justification of the consequences of this deviation being no worse than major is understood. However, it is considered that the justification presents mitigating factors that the minimal impact on safety is acceptable, rather than justifying an 'equivalent level of safety'. It is suggested that this issue has arisen because the loading cases defined by the tyre ETSO and the wheel ETSO are different and the tyre ETSO includes the combined radial and side load test from the wheel ETSO.</p> <p>It is recommended that the two ETSOs should be harmonised so that the loading cases are the same, and, in particular, that a combined radial and side load test be included In the ETSO for the tyre.</p>
Justification:	
Proposed Text: (if applicable)	
Author's Response:	<p>The commenter is correct in their assessment of the justification for this deviation. The minimal impact on safety is acceptable, rather than being an equivalent level of safety.</p> <p>It is also accepted that one or both of the ETSOs (for wheels and brakes and for tyres) will need to be revised, but this is the work of future rulemaking, and in the meantime, the deviation will be accepted as explained in the EASA Position.</p>