

# Deviation Request ETSO-C30c#5 for an ETSO approval for CS-ETSO applicable to Aircraft Position Lights (ETSO-C30c) Consultation Paper

## 1 Introductory Note

The hereby presented deviation requests shall be subject to public consultation, in accordance with EASA Management Board Decision No 7-2004 as amended by EASA Management Board [Decision No 12-2007](#) products certification procedure dated 11th September 2007, Article 3 (2.) of which states:

“2. Deviations from the applicable airworthiness codes, environmental protection certification specifications and/or acceptable means of compliance with Part 21, as well as important special conditions and equivalent safety findings, shall be submitted to the panel of experts and be subject to a public consultation of at least 3 weeks, except if they have been previously agreed and published in the Official Publication of the Agency. The final decision shall be published in the Official Publication of the Agency.”

## 2 ETSO-C30c#5 AIRCRAFT POSITION LIGHTS

### 2.1 Summary of Deviation

Deviates from ETSO-C30c by not marking the minimum lamp candle power or lamp part number for lights using non-replaceable light-emitting component(s).

### 2.2 Original Requirement

ETSO-C30c section 4.1 “In lieu of the marking detailed in CS-ETSO Subpart A paragraph 1.2, the minimum lamp candle power or lamp part number shall be shown.”

### 2.3 Industry

Position lights based on LED do not contain any lamp. The light is emitted by LEDs which are fully casted in epoxy and soldered on the light electronics. Opposite to lamps, LED cannot be replaced and the complete light need to be replaced in case of failure. Therefore a placard of the minimum lamp power or P/N is not applicable, and even misleading because no lamp can be exchanged.

### 2.4 Equivalent Level of Safety

A level of safety equivalent to the lamp power or P/N marking is provided by the LED not being interchangeable.

### 2.5 EASA position

We accept the deviation.