

Deviation Request ETSO-C46a#4 for an ETSO approval for CS-ETSO applicable to Maximum Allowable Airspeed Indicator (ETSO-C46a)

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-C46a#4 Maximum Allowable Airspeed Indicator

2.1 Summary of Deviation

Deviates from SAE AS437 Revision A 4.1.4 to not display Instrument Title and unit of measure for instruments indicating Airspeed always in the same unit of measure.

2.2 Original Requirement

SAE AS437 Revision A 4.1.4 states:

“Instrument Title: The instrument title (airspeed) shall be of the same approximate size but no larger than the numerals. The title may be of the same finish as the numerals. The units of measure (Knots) shall appear on the dial in lettering noticeably smaller than either the numerals or title.”

2.3 Industry

The display has a compact format and does not allow space for titles or units of measure. The data on the display is presented in industry standard format following the conventional “basic T” arrangement for standby display instruments and is consistent with other flight deck instrumentation to minimise potential confusion without said labelling.

Additionally ARP4102-7 does not recommend labelling of the function or units for airspeed.

The airspeed unit of measure is not selectable from the user.

2.4 Equivalent Level of Safety

The display presents a scrolling Airspeed tape with digital readout in a standardized format and a standard location that does not need the specific label of Airspeed or the unit of measures. The Airspeed tape is

presented directly to the left of the Attitude indicator on the display consistent with other primary flight display information.

An equivalent level of safety is provided by ensuring that the Airspeed information on the display is in a similar arrangement to the one of the Primary Flight Instruments and is always indicated in the same unit of measure.

Additionally ELOS to not display the unit of measure is achieved if the installation Manual, User Manual and DDP clearly indicate the unit of measure for the installer, with a limitation of installation “ the equipment shall be installed only in flight deck system using Airspeed indication being “xxxx”* ”.

“xxxx”* please replace xxxx by the applicable unit of measure: mph, km/h, or knots.

2.5 EASA position

We accept the deviation.