

Deviation Request ETSO-C8e#1 for an ETSO approval for CS-ETSO applicable to Vertical Velocity Instrument (Rate-of-Climb) (ETSO-C8e) 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-C8e#1 Vertical Velocity Instrument (Rate-of-Climb)

2.1 Summary of Deviation

Deviates from SAE AS8016 Revision A Section 3.3 Fire Resistance by using Eurocae ED-14G/RTCA DO-160G Section 26 Fire, Flammability instead of FAR 25.1359(d) and its Appendix F.

2.2 Original Requirement

SAE AS8016 Revision A Section 3.5 Fire Resistance states :

“Except for small parts (such as knobs, fasteners, seals, grommets, and small electrical parts) that would not contribute significantly to the propagation of a fire, all materials used must be self-extinguishing when tested in accordance with the requirements of Federal Aviation Regulation 25.1359(d) and Appendix F thereto, with the exception that materials tested may be configured in accordance with paragraph (b) of Appendix F or may be configured as used.”

2.3 Industry

SAE AS8016 Revision A Section 3.3 requires analysis to be performed in accordance with FAR 25.1359(d) and Appendix F. The FAR 25.1359 standard was removed on the 20th of July 1990.

ED-14 revision G Section 26 Fire, Flammability is covering the self-extinguishing requirement and the test conditions to be performed to cover Fire resistance. Since it is a more recent and more accurate requirement, DO-160 revision G can be considered as an equivalent Level of Safety.

2.4 Equivalent Level of Safety

An equivalent level of safety is provided through compliance to Eurocae ED-14G/RTCA DO-160G Section 26,
as those test requirements are equivalent to the ones in the current revision of CS-25/Appendix F - Part 1

2.5 EASA position

We accept the deviation.