Deviation Request ETSO-C3d#5 for an ETSO approval for CS-ETSO applicable to Turn and Slip Instruments (ETSO-C3d)
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-C3d#5 Turn and Slip Instruments

2.1 Summary of Deviation

Deviates from SAE AS8004 Section 3.5 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 AS8004 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 AS8004 Section 3.5 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.

2.5 EASA position

We accept the deviation.