

EASA CS-ETSO Deviation Consultation ETSO.Dev.C95a#1, ETSO.Dev.C8e#1, ETSO.Dev.C3d#5, ETSO.Dev.C2d#7, ETSO.Dev.C106#4, ETSO.Dev.C113#13
COMMENT RESPONSE DOCUMENT ETSO.CRD.DevC95a#1.C8e#1.C3d#5.C2d#7.C106#4 published 17th June 2016
[initial consultation period closed 11/07/2016]

DEVIATION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
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ETSO.Dev. C95a#1, ETSO.Dev. C8e#1, ETSO.Dev. C3d#5, ETSO.Dev. C2d#7, ETSO.Dev. C106#4, ETSO.Dev. C113#13	Boeing Commercial Airplanes Comments to multiple EASA ETSO Deviation COMMENT #1 of 3 Editorial Affected paragraph and page number Page:1, Paragraph: 2.3 THE PROPOSED TEXT STATES: "2.3 Industry SAE AS8018 Revision A Section 3.12 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 selfextinguishing requirement and the test conditions to be performed to cover Fire resistance. Since it is more recent and more accurate publication, DO-160 revision G can be considered as an equivalent Level Of Safety." REQUESTED CHANGE: "2.3 Industry SAE AS8018 Revision A Section 3.12 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 selfextinguishing requirement and the test conditions to be performed to cover Fire resistance. Since it is more recent and more accurate publication, DO-160 revision G can be considered as an equivalent Level Of Safety. Wire flammability in accordance with the test procedure in DO-160 revision G, is acceptable to EASA and FAA for showing compliance to 14 CFR Part 25.869(a)(4) and 14 CFR Part 25.1713(c)." JUSTIFICATION: As stated in the ETSO deviation approvals, 14 CFR Part 25.1359(d), was removed from CFR and JAA/EASA regulation in 1990; and 14 CFR Part 25.869, Fire Protection; Systems, was introduced at Amendment 25-72, and became effective 8/20/90. On December 12/10/2007, 14 CFR 25.869 was revised at Amendment 25-123, removing the wiring flammability requirement from subject regulation. At the same time and date (12/10/2007), EASA/FAA released the 14 CFR Part 25.1713 Fire Protection.	Terry L. McVenes	11th July 2016	Rejected. This section of the deviation request is the industry statement and rationale of requesting the deviation. EASA will not change the industry rationale.
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<i>Wire flammability testing for 25.1359, 25.869, and 25.1713 shall be done in accordance with applicable Section of Appendix F.</i>			
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If EASA/FAA accepting the wire flammability test procedure in DO-160, Revision G as an acceptable test method for 25.1359, this test method should be accepted as well to EASA/FAA wire flammability regulations which were released after July 20th 1990.

Further, if DO-160, Revision G, wire flammability test method is acceptable to EASA/FAA for TSO holder, it should be acceptable for all interested parties which must show compliance to wire flammability regulation under 25.869(a)(4) prior to Amendment 25-123, and 25.1713(c) at Amendment 25-123.

COMMENT #2 of 3

Editorial Affected paragraph and page number

Page: 1, Paragraph: 2.4 Equivalent Level Of Safety

THE PROPOSED TEXT STATES:

"2.4 Equivalent Level of Safety

An equivalent level of safety is provided through compliance to Eurocae ED-14G/RTCA DO-160G Section 26.

REQUESTED CHANGE:

*"2.4 **Equivalent Level of Safety Acceptable Method of Compliance***

An equivalent level of safety is provided through compliance to Wire flammability test in accordance with Eurocae ED-14G/RTCA DO-

160G Section 26 is acceptable as an approved wire flammability

test by EASA/FAA for showing compliance to 25.1359, 25.869(a)(4) Amendment 25.113, and 25.1713 Amendment 25.123.

JUSTIFICATION:

EASA/FAA regulation number has changed through the years and various Amendment levels, however, the test procedure has not changed. If Eurocae ED-14G/RTCA DO-160G test method is an acceptable test, it should be acceptable for the same requirement with different EASA/FAA regulation number or Amendment Level. Further, it is acceptable for the TSO holder it should be acceptable for all interested parties such as TSO, TC, ATC, STC, etc. holders.

Terry L.
McVenes

11th July
2016

Partially accepted.

Equivalent Level of Safety is mandatory to be demonstrated with regard to deviation request in accordance with Part 21.A.610. Therefore EASA will keep that term into deviation requests.

This original requirement is related to the entire material and not only to wire. Therefore EASA will not restrict the deviation to wire flammability test.

The purpose of this deviation is to propose an acceptable alternative to the original ETSO standard requirement for flammability that is considered somehow outdated in standards SAE AS8019A, AS8018 A, AS8004, AS8016A, AS8034B, AS8002. EASA considers that ED-14G/DO-160G is proposing an acceptable alternative for ETSO article approval.

When compliance to this ED-14G section 26 is demonstrated, this evidence for the equipment might be used at installation level for compliance to the applicable CS.25 Appendix F Part I test methods.

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EASA is focusing here on the Equivalent Level of safety finding for authorization of ETSO articles. An update to the section "Equivalent level of safety" is proposed resulting from the comment of Boeing as follows:

				"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."
	COMMENT #3 of 3 <i>Editorial Affected paragraph and page number</i> Page: 2, Paragraph: 2.5 EASA Position THE PROPOSED TEXT STATES: "2.5 EASA position We accept the deviation." REQUESTED CHANGE: "2.5 EASA position We (EASA/FAA) accept the proposed wire flammability testing in accordance with Eurocae ED-14G/RTCA DO-160G as an acceptable wire flammability test method for showing compliance to 25.1359, 25.869(a)(4), and 25.1713(c) in lieu of the wire flammability in accordance with Appendix F.accept the deviation." JUSTIFICATION: We would like a definitive statement from the authorities accepting the test method in Eurocae ED-14G/RTCA DO-160G as an acceptable method of compliance to the applicable wire flammability rules.	Terry L. McVenes	11th July 2016	See response to comment #2. This deviation request is related to ETSO authorization and the text will stay focused on CS-ETSO level. Boeing might express the request to the authorities at the aircraft level process. With the acceptance of this specific deviation EASA recognizes consistency between this Fire, Flammability test requirements on equipment and aircraft level.