

Comment				Comment summary	Suggested resolution	Comment is an observation (suggestion)	Comment is substantive (objection)	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	BOEING	§ 2.1	1	The proposed requirement is overly prescriptive. While a hardware control is probably the most practical means for the crew to activate the ASR today, other acceptable means may be identified in the future and should not be excluded.	Requested change: “2.1/ ASR activation The ASR shall be activated only while selected by the crew upon use of a dedicated hardware control (such as a Push-to-Command (PTC) button). The crew shall have a means to activate the ASR, such as a dedicated Push-to-Command (PTC) hardware button, speaking a keyword, or by other appropriate means. Means to prevent or mitigate an erroneous continuous ASR activation shall be provided. PTC controls shall be designed to mitigate the risks of selection error with respect to the Push to talk (PTT) controls.”		X	Not accepted	For initial application of the special condition paragraph 2.1 is drafted on purpose to request dedicated hardware control for activation only. In future projects depending on the development and experience with the use of voice recognition systems the special condition could be modified to take into account other activation means.
2	BOEING	§ 2.4	2	Not all functions of a particular aircraft are appropriate to control through ASR. For example, a command for shutting down the engine would be inappropriate if it could be inadvertently executed in air due to only a speech recognition error. An applicant must be able to show that the functions that can be controlled through ASR are appropriate and safe.	Requested addition: “2.4/ Commands Spoken commands accepted by the ASR functions shall be consistent with the corresponding aircraft instruments and controls markings and be in the same language. Consideration shall be given to which functions are appropriate to control through ASR. For those functions that can be controlled through ASR, the hazard level shall be determined to be acceptable for cases where speech recognition errors result in the execution of unintended commands.”		X	Noted	The comment is noted and agreed, however the proposed addition is already covered by paragraph 3 of the special condition (ASR shall comply with provisions of CS 27.1301 and 1309). In addition, the Special Condition will be raised on projects through a dedicated Certification Review Item (CRI) which will provide proposed acceptable means of compliance on safety analysis of speech recognition systems.

- **Accepted** — The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
- **Partially accepted** — Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
- **Noted** — The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
- **Not accepted** — The comment or proposed amendment is not shared by the Agency.