## EASA CS-ETSO Deviation Consultation ETSO.DevP.08 COMMENT RESPONSE DOCUMENT ETSO.CRD.DevP08to ETSO.DevP08 published 29.05.2007 initial consultation period closed 19.06.2007

DEVIATION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE	
General	Overall the deviation requests seem reasonable although all of the requests incorporate higher standards.  Will this have any bearing on future development of ETSO C129a (is this deviation request the new standard)?	CAA UK	14.06.2007	Noted If updating EUROCAE ED-72A it is proposed to harmonize some areas with RTCA DO-229D. Both standards addressing different types of GNSS receivers but should have similar requirements for similar functions. This deviation will not force to use the newer standard as it is the nature of deviations to be requested from applicants.	
ETSO-C129a#6	It is not clear how this constitutes a deviation from the ETSO Section 3.2.2.4 j(5) requires a smooth transition from 1Nm to 0.3Nm at the FAF, not a step change.	CAA UK	14.06.2007	Partly accepted The requirement asks for a dedicated full scale cross track deviation and a transition between the two given values while the deviation uses a ILS look alike full scale value constantly varying with the distance to the threshold and going below the 0.3 NM value specified in the requirement as well. The wording in the short description will be changed to better describe the issue. The new description reads: Deviate from EUROCAE ED-72A Section 3.2.2.4.j.(4), -(5) and provide a smooth ILS look alike cross track deviation instead the requested transition to 0.3 NM full scale deviation.	
ETSO-C129a#7	Seems to be some confusion with Para 3b), requesting a 15 second alert in lieu of a 3 nautical Mile alert for the scaling change: if the 15 second rule is applied ahead of the FAF (where there is no FACF), then 15 seconds is a lot less warning than 3M (where at 120knots it would take 90 seconds to travel 3NM).		14.6.2007	Rejected The main purpose of the scale change alert is to make the pilot aware that there is an upcoming automatic change of the display behaviour. There is no direct action required by this information. As the system changes its functioning it is better to have this kind of information shortly before it	

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				happens and with a constant delay time before the action takes place instead of linking this information to a distance with a speed dependent delay until the reaction will be seen to happen.		