European Aviation Safety Agency

Comment-Response Document 2013-21

Yawing Conditions (Rotorcraft)

CRD TO NPA 2013-21 — RMT.0119 (27&29.003) – 30.11.2016

EXECUTIVE SUMMARY

This CRD contains the comments received on NPA 2013-21 and the responses, or a summary thereof, provided thereto by the Agency.

In response to the comments received, no changes have been made to CS-VLR, CS-27 and CS-29 or their AMC.

Applicability		Process map	
Affected regulations and decisions:	Decision 2003/017/RM (CS-VLR); Decision 2013/015/RM (CS-27); Decision 2003/016/RM (CS-29).	Concept Paper:	No
		Terms of Reference (Issue 2):	21.10.2008
		Rulemaking group:	Yes
Affected stakeholders:	Rotorcraft TC/RTC/STC applicants	RIA type:	Light
		Technical consultation during NPA drafting:	No
Driver/origin:	Level playing field	Publication date of the NPA:	4.11.2013
		Duration of NPA consultation:	2 months
Reference:	N/A	Review group:	No
		Focussed consultation:	No
		Publication date of the Opinion:	N/A
		Publication date of the Decision:	2016/Q3

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1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this Comment-Response Document (CRD) in line with Regulation (EC) No 216/2008[1] (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure[2].

This rulemaking activity is included in the Agency's 4-year Rulemaking Programme, under RMT.0119 (27&29.003). The scope and timescale of the task were defined in the related Terms of Reference (see 'process map' on the title page).

The draft CS has been developed by the Agency. All interested parties were consulted through NPA 2013-21[3], which was published on 4 November 2013.

7 comments were received from interested parties, including industry and National Aviation Authorities (NAAs).

The text of this CRD has been developed by the Agency.

The process map on the title page contains the major milestones of this rulemaking activity.

1.2. The structure of this CRD and related documents

This CRD provides a summary of comments and responses as well as the full set of individual comments and responses thereto received on NPA 2013-21.

1.3. The next steps in the procedure

The individual Decisions containing CSs will be published by the Agency for each related CS.

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1 Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1).

2 The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure')

3 http://www.easa.europa.eu/document-library/notices-of-proposed-amendments/npa-2013-21.

2. Summary of comments and responses

7 comments were received on NPA 2013-21 from 5 commentators.

The responses to these comments can be summarised as follows:

	Accepted	Partially Accepted	Noted	Not Accepted	Total
Number of Comments	0	0	6	1	7
%	0 %	0 %	86 %	14 %	100 %

Those 'Noted' were largely supportive of the proposals.

3. Individual comments (and responses)

In responding to comments, a standard terminology has been applied to attest the Agency's position. This terminology is as follows:

(a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.

(b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.

(c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.

(d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

(General Comments)	-

comment	*2* comment by: *Airbus Helicopters* Eurocopter concurs with NPA 2013-21.
response	*Noted*

comment	*4* comment by: *Luftfahrt-Bundesamt* The LBA has no comments on NPA 2013-21.
response	*Noted*

comment	*5* comment by: *DGAC France* DGAC France has no specific comment on this NPA
response	*Noted*

comment	*6* comment by: *UK CAA* **Page No:** General **Paragraph No:** General **Comment:** CAA supports the proposed amendment and has some comments which we hope you find helpful.
response	*Noted*

2. Explanatory Note — 2.1. Overview of the issues to be addressed p. 5-11

comment

7 comment by: *UK CAA*

Page No: 8 , 9 and 13

Paragraph No: 2.1.4.3 “Environmental Conditions Applicable” and Para 3.1 “Proposal 1: Amend to FAA AC 27.351 and FAA AC 29.351,...” sub-para b. (4).

Comment: The NPA notes that there is a potential for higher loading at higher density altitudes associated with low temperature operations, and that applicants specifically requesting certification at low temperature must comply with additional requirements including xx.351. Further justification is then provided in the NPA that includes specific reasons and justifications for only using sea level ISA for the xx.351 cases in lieu of lower temperatures.

Whilst beyond the apparent scope of this rulemaking activity there is a lack of clarity as to the validity or otherwise of this S/L ISA approach to the remainder of the loading requirements of CS 27, 29, and VLA, when an application for low temperature operations has been made. Note the existing/proposed unchanged FAA AC text on page 13, para 3.1 Proposal 1, sub-para b. (4) already states “For the purpose of this section, the analysis may be performed at international standard atmosphere (ISA) sea level conditions.”

Justification: Clarification of scope of NPA proposal regarding use of S/L ISA as applicable to xx.351 only.

Proposed Text: Text of FAA AC 27.351 and FAA AC 29.351 text ref., NPA at sub-para 3.1 b. (4) on page 13 to be amended to read as follows:

“For the purposes of this section *only, (i.e. xx.351 compliance)*, the analysis may be performed at international standard atmosphere (ISA) sea level conditions.”

response

Not accepted

This is AC/AMC to CS 27/29.351. No opinion is given as to the environmental conditions necessary for certification outside the scope of xx.351. The existing text is believed to be clear and adding the word 'only' may imply an opinion that was not intended and could add further confusion.

2. Explanatory Note — 2.2. Objectives p. 11

comment

3 comment by: *bjowid*

This is a test.

response

Noted

2. Explanatory Note — 2.4. Overview of the proposed amendments p. 11-12

comment	*1* comment by: *MENY EUROCOPTER* En vol d'essais: 1. il semble évident de répondre à une visite médicale 2. D'identifier rapidement le niveau d'urgence suite à un problème 3. De pouvoir aider la conduite de l'aéronef en cas de problème, et cela dans le calme 4. Répondre à une demande du pilote 5. Ne pas interférer à une procédure 6. Avoir un bon sens aviateur Donc sans une formation adaptée comme celle d'aujourd'hui, il me semble indubitable que lors d'un problème majeur, voir mineur, la sécurité du vol pourra se dégradée rapidement.
response	*Noted*

3. Proposed amendments — 3.1. Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision) p. 13-18

comment	*8* comment by: *UK CAA* **Page No:** 15 **Paragraph No:** Para 3.1 - Figure 1 **Comment:** The figure 1 (based on the Figure AC29.351B-1 "Yaw/Forward Speed Diagram") has been amended to include a new grey line and shaded section between the lesser of that grey line, the original "line" and the abscissa and ordinate axes. In order to support the associated text of Para 3.1 c. The Figure 1 should include labelling on the grey line and the shaded areas indicating that the grey line is indicative of the maximum yaw capability of the helicopter, (maximum transient sideslip angle), and that the grey shaded area defines the scope of the loading investigations. **Justification:** Clarity and support of intent of proposed amended text. **Proposed Text:** As comments above regarding additional proposed labelling of Figure 1.
response	*Noted* The proposed changes are considered to be minor and would not significantly increase the readers understanding. The figure is intended to be when used in conjunction with the written procedure.