

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	Airbus Helicopters	SC GP 27.33	16	A coma after “the type” would help the reading	Add a coma after “the type”	Yes	No	Accepted	Text corrected as suggested
2	Airbus Helicopters	SC GP 27.45	17	Paragraph (f) refers to “aeroplane’s “	Change to “gyroplane”	Yes	No	Accepted	Text corrected as suggested
3	Airbus Helicopters	SC GP 27.917B	68	Paragraph (c) indicate that means to prevent the likelihood must be identified. The likelihood cannot be prevented, but is rather minimised at best. Preventing would mean suppressing the possibility to have damages which can be said more directly by “prevent damages”	EASA to clarify the intent of “prevent the likelihood”, depending on the original intent of the requirement	Yes	No	Accepted	The SC GP 27.917B paragraph (C) is modified as follows:  (c) A safety assessment must be performed to ensure that the pre-rotating drive system functions safely over the full range of conditions for which certification is sought. The safety assessment must include a detailed failure analysis and identify any pre-rotating drive system parts driven by the rotor in flight. The assessment must identify means to <b>minimise</b> the likelihood of pre-rotating drive system damage, which might affect continued safe flight and landing.
4	Airbus Helicopters	SC 27.917A & SC 27.1301A	120	The title is indicating “ROTOR DRIVE SYSTEM3 instead of “ROAD DRIVE SYSTEM” according to our understanding of this chapter	Indicate “ROAD DRIVE SYSTEM3 in the chapter title	Yes	No	Not accepted	The reference to rotor drive system is kept as is related to the road drive system interaction with the rotordrive system. What it is relevant to the airworthiness of the product and not its usability as road vehicle.
5	Airbus Helicopters	SC 27.1301A	120	The SC refers to an hazard analysis that is not defined elsewhere. The sentence seems incomplete or erroneous: the Hazard analysis must show which possible hazardous mistakes or damages <i>may occur or can reasonably be expected?</i>  The sentence refers to “mistakes” which are not defined, contrarily to “errors”  It is surprising to have no human factors related requirement in the paragraphs of the SC applicable to equipment for use by the crew. Indeed specific HF requirements have been developed in the frame of RMT.0713 and equally applicable to CS-27 products. Also the Agency has incorporated HF requirements in SC VTOL.2600 with the requirement “The system and equipment design must account for flight crew errors, which could result in additional hazards.”	Define what is the purpose of the referred to hazard analysis and the requirement to have it done.  Use “error” instead of “mistake”  EASA to clarify the rationale for not incorporating human factors related requirements in the SC, in particular for equipment used by the crew.	Yes	Yes	Partially accepted	The proposed SC requirements were based on the certification specifications (and equivalent) that were in force at the application date for TC, when the referred RMT task and VTOL requirements had not yet been initiated or published.  For the creation of the certification basis, articles from CS-27 and CS-23 were selected when applicable. Additional requirements were generated when necessary due to the gyroplane principle and road use of the vehicle. For CS-27 rotorcraft, Human Factors are part of the Miscellaneous Guidance of AC 27-1B (AC 27 MG 20).  In any case, while only the requirement SC 27.1301A for “safety of conversion” is reported in this publication, associated MOCs have been also prepared but are not published with this SC: EASA will address Human Factors in this project through a dedicated CRI MOC.
6	Airbus Helicopters	SC GP 27.562	40	The intent of the requirement is unclear. The objective to minimize load factors in the forward direction does not clearly relates to static or dynamic landing conditions. Is the intent of this paragraph to ensure protection of occupants against emergency crash landing dynamic condition?	EASA to clarify the rationale for not incorporating additional requirements related to emergency landing dynamic conditions in the SC, at least dynamic conditions that are likely to occur in an emergency landing.	No	Yes	Noted	EASA did consider the dynamic conditions and took into account the different flight characteristics of a gyroplane. It was concluded that the loading conditions are different from conventional rotorcraft and that taking dynamic seat testing into account for the comparably low g-loading of gyroplanes would not increase the safety level.

7	Europe Air Sports / Nils Rostedt	All	All	<ul style="list-style-type: none"> <li>EAS supports the issuance of this SC, as it could foster innovation and contribute to further recruitment and interest in general aviation and air sports.</li> </ul>		Yes	No	Noted	EASA notes EAS support
8	Europe Air Sports / Nils Rostedt	Subpart A - GENERAL SC GP 27.1 Applicability	14	<ul style="list-style-type: none"> <li>EAS notes that the SC will not apply to gyrocopters with an MTOM of 600 kg or less, unless the conditions of Regulation (EU) 2018/1139 Article 2(4) are met. In EAS' view, this caveat should be mentioned for clarity in SC GP 27.1 <i>Applicability</i>.</li> </ul>		Yes	No	Not accepted	The commenter's proposal is not deemed necessary as the limitation is already included in Annex I of EU Regulation 2018/1139, which explicitly excludes gyroplanes (1 or 2 seats) with MTOM not exceeding 600 kg., and for standardisation purposes with already published CSs.