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	*Andy Evans (Aerossurance)*	3.1(a)	4	We strongly support the statements: "The competency and responsibility for the assessment of VHM capability should reside with the TCH / VHM STCH and not with the operator" and "Continued airworthiness review of VHM performance will consequently be the responsibility of the TCH / STCH, thus ensuring that compliance with CS 29.1465 is maintained after certification and entry into service." The fallacy that operators can ensure the safety critical effectiveness of a VHM required under an operating rule has been shown by the failure of previous national operational rules to ensure the effectiveness and evolution of certain VHM systems.	No action required.	Observation		Noted	
2	*Andy Evans (Aerossurance)*	3.1(a)	4-5	While some CSIs conducted by NAAs may provide some useful evidence (provided rigorous and regular reviews with all key stakeholders were conducted and actions tracked), we note that EASA MS NAA's have not been Competent Authorities for certification matters on CAT helicopters and their systems for a number of years and unless such reviews were conducted by or coordinated by personnel with direct rotorcraft and VHM certification experience, they may offer only very limited assurance. Hence, we are strongly supportive of the statement: "full compliance with CS29.1465 will still need to be demonstrated by the TCH or VHM STCH".	No action required.	Observation		Noted	
3	*Andy Evans (Aerossurance)*	General		The approach EASA propose will allow certified VHM to be used in the response to continued airworthiness problems in future AND will address a current problem that some systems - that have not been certified functionally as effective health monitoring systems (merely having a no hazard no credit installation approval), and may also lack suitable ICA to allow operator's and their maintenance organisations to determine if an aircraft is safe to release to service - are being used today beyond their certified scope. What was acceptable in 1991 should not still be the default in 2019!	No action required.	Observation		Noted	
4	*Elizabeth Barnhart (BHTI)*	2.	4	The 1st Jan 2019 date to show compliance with 29.1465 is too aggressive for current, fielded HUMS if any design changes are required as a result of the safety analysis. In addition, since no previous systems have demonstrated compliance against 29.1465, we anticipate the time period required to do so -even without design changes – will be longer than traditional certification due to the new/novel nature of the rule.	A 1st Jan 2020 alternate date is proposed to allow sufficient time to demonstrate compliance.			Disagree	This CM only clarifies the need for certification of VHM systems associated with the operational rule "SPA.HOFO.155", which was issued by the European Commission on the 22nd of July 2016. The 1st of January 2019 date is established by this rule and not by the CM itself. Therefore, EASA has no direct authority to alter this date.

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5	*Elizabeth Barnhart (BHTI)*	3.1	5	It is unclear if demonstrating compliance to 29.1465 for the purpose of operating under SPA.HOFO.155 requires completion of the controlled introduction to service phase. Please specify. If completing CSI is required for operation under SPA.HOFO.155, then a 1 Jan 2021 date may be more appropriate since such a demonstration phase may take up to one year.	Clarification required.			Agreed	Clarification has been added to the CM, CSI is not required prior to certification and, therefore, completion of the CSI is not necessary before 1st of January 2019.
6	*Tony Morris (British International Helicopters)*	General		What about old helicopters using VHM systems designed by third parties?	Clarification needed.			Noted	EASA would expect the STC holder of the VHM system to demonstrate compliance, as stated in the CM. EASA recommends an early application by the STC holder in case issues arise or modifications need to be made to the VHM system.
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