

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	Federal Aviation Administration, Transport Standards Staff		9	CS 25.933(a) includes two compliance options. The requirement in 14 CFR 25.933(a)(1)(ii) is similar to the second CS option in CS 25.933(a)(1)(i). Both the CFR and CS 25.933(a)(1)(ii) require that the airplane be shown to be fully controllable with a deployed thrust reverser. Therefore, we believe an airplane found to comply with 14 CFR 25.933(a)(1) will also comply with CS 25.933(a)(1). We acknowledge that CS 25.933(a)(1)(i) provides an alternative certification approach that could result in a different design. However, that requirement is optional.	The FAA recommends that CS 25.933(a) be removed from the SSD list.	No	Yes	Not accepted	14 CFR 25.933 is based upon in flight controllability. It requires flight test for compliance; from a design point of view, it may involve features to ensure controllability, for instance a bigger rudder etc.. CS 25.933 is based upon robust control system and it requires through qualification and safety assessment the showing compliance. From a design point of view it involves additional locking/retention means and more sophisticated controls.
2	Federal Aviation Administration, Transport Standards Staff	1.2	3	The SSD definition changed with TIP Rev. 3, approved April 23, 2013. This initial EASA SSD list should be based on the current TIP definition.	Change reference to TIP Rev. 3.	No	Yes	Not accepted	The rationale for using the current TIP rev. 2 definition is based on the following: <ol style="list-style-type: none"> TIP rev. 2 was applicable at the time when CS-25 Amdt. 12 /CFR Part 25 Amdt. 136 were issued. The SSD definition used for this comparison is the definition provided in TIP rev. 2. It should be noted that at TIP rev. 3, the SSD definition has been amended, which could potentially result in some new SSDs being added to the list. The current revision of the TIP is rev.4 (dated 22 September 2014). A new TIP revision should follow shortly.
3	Federal Aviation Administration, Transport Standards Staff	Appendix 1	5	The text refers to TIP Rev. 2, and provides the Rev. 2 SSD definition. This definition changed with TIP Rev. 3, approved April 23, 2015.	The text should be revised to reference TIP Rev. 3, and to provide the TIP Rev. 3 SSD definition.	No	Yes	Not accepted	Please see the response to comment no 2. Text has been changed for clarity. ‘This following list of SSDs which require <u>direct CS-25</u> compliance is based on the CS-25/14 CFR Part 25 Amendment pair noted in the header’.
4	Federal Aviation Administration, Transport Standards Staff	Appendix 1	5	The first sentence in the “General Comments and Assumptions” paragraph states “This following list of SSDs <u>which require direct EASA compliance</u> is based on the CS-25/14 CFR Part 25 Amendment pair noted in the header.” This underlined phrase seems to imply that compliance to each SSD must be determined by EASA with no opportunity for the FAA to make the associated compliance determinations on behalf of EASA. This may not have been the intent of the phrase, but nevertheless we believe the underlined statement should be removed to avoid misunderstanding. The process by which a determination is made by the CA to retain or delegate a compliance determination to an SSD is described in the TIP and need not be discussed in the SSD list itself.	Replace the statement “This following list of SSDs which require direct EASA compliance is based on the CS-25/14 CFR Part 25 Amendment pair noted in the header” with the following: “This following list of SSDs is based on the CS-25/14 CFR Part 25 Amendment pair noted in the header.”	No	Yes	Partially accepted	Text has been changed for clarity. ‘This following list of SSDs which require direct CS-25 compliance is based on the CS-25/14CFR Part 25 Amendment pair noted in the header’.

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						
5	Boeing Commercial Airplanes	GENERAL COMMENT		<p>The proposed CM does not reflect more recent CS-25 and 14 CFR Part 25 amendments. The proposed CM uses CS-25 Amendment 12 (dated 6 July 2012) as its basis for comparison with 14 CFR part 25 Amendment 136 (dated 27 December 2011).</p> <p>CS-25 is currently at Amendment 16 (dated 12 March 2015) and 14 CFR Part 25 is at Amendment 141 (dated 14 November 2014). The difference in the respective amendments being used can be seen in that 14 CFR 25.307(a), highlighted as having different wording with respect to CS 25.307(a), was harmonized with CS-25 at 14 CFR 25 Amendment 139 (dated 24 September 2014).</p>	<p>Boeing recommends that the list of Regulatory Significant Standards Differences be revised to reflect the <u>latest</u> amendment levels for both EASA's CS-25 and FAA's 14 CFR Part 25.</p> <p>As indicated in our example, unless the regulations are compared to the latest amendment levels, the information provided will not be useful, since it is already outdated and could be confusing.</p>	Yes		Noted	Once this CM is published, the current and the future regulatory amendment pairs will be considered as necessary. The next revision of regulatory standard differences list would also take into account any further TIP developments.
6	Boeing Commercial Airplanes	GENERAL COMMENT		<p>The proposed CM does not identify 25.571(b) as being a Significant Standards Difference (SSD).</p> <p>CS 25.571 does not appear to match 14 CFR Part 25 Amendments 96 or 132 with regard to freedom from widespread fatigue damage (WFD).</p>	Boeing recommends that the proposed CM be revised either to address this difference or to note that CS 25.571 will be addressed by the forthcoming release of the EASA "Ageing aircraft structures" rules (reference: NPA 2013-07).	Yes		Not accepted	<p>14 CFR 25.571(b) at Amendment 132 is believed to be more demanding with regard to WFD showing of compliance than CS 25.571(b) at Amendment 12. Therefore CS 25.571 is not identified as an SSD.</p> <p>It should be noted that the on-going rulemaking tasks such as NPA 2013-07 are not considered in this CM, and the SSD's are based on a comparison between two Amendment pairs as published.</p>
7	Airbus	General comment		<p>Airbus supports this initiative to establish a list of Significant Standards Differences (SSDs) between CS-25 and FAR 25. Nevertheless this document would be more useful if it also included the list of the non-significant differences. Indeed, the frontier between the SSDs and the Non-SSDs is sometimes very close and it would be more helpful to have a comprehensive list of differences. In addition, with only the SSDs, it is not clear if there is no difference or if the difference is just non-significant. An alternative could be to have a separated document with Non-SSDs as it is proposed by the FAA.</p>	Airbus suggests to extend this document to non-significant differences or to publish an additional document with non-SSDs.	Yes		Noted	<p>At this revision, the CM will publish the EASA SSDs for the Amdt. pair as reflected herein.</p> <p>Further revisions of the CM will include GVIs. The need to produce a Non-SSD list based on the TIP rev. 2 will be assessed, however, it should be noted that at the TIP rev. 3 (approved 23 April 2013) the Non-SSDs were removed.</p> <p>Looking forward, unless otherwise stated in a future revision of the TIP, a Non-SSDs list will no longer be required.</p>
8	Airbus	Appendix 1	Page 6	<p><u>CS 25.373 Speed control devices</u></p> <p>Airbus would recommend to be more specific as follows:</p> <p>CS 25.373 (b) specifically refers to CS25.341 (a) and (b) while FAR 25.373 (b) only refers to FAR 25.341 (a)</p>	Please modify this item.	Yes		Partially accepted	The text has been changed to be more specific with regards to paragraphs 25.371, 25.373 and 25.391. Since only CS 25.341 (b) and (c) constitute SSDs, the relevant specific SSD subparagraphs have been quoted in the CM's 'comments' column, as appropriate.
9	Airbus	Appendix 1		<p><u>CS 25.631 Bird strike damage</u></p> <p>Airbus considers this paragraph should be mentioned in the list. CS 25.631 requires considering bird strikes for the complete aircraft while FAR25 is only requiring such an assessment for the empennage. Although FAR 25.571(e) is referring to bird strikes for the complete airframe, this is only addressing the residual strength aspects for the airframe structure</p>	Please add this subject in the table.	Yes		Accepted	Although it is EASA understanding that compliance with the bird strike requirement could be equivalent when considering all related requirements including 25.631, 25. 571, 25.1309 and in particular the associated advisory material, this item is retained as an SSD based on the differences at the requirements' level only.

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						
10	Dassault-Aviation	General		<p>Dassault thanks the EASA for submitting this Certification Memo to Industry comments, and supports this initiative.</p> <p>We agree with the content of this Certification Memo, with some comments identified below and filed in the attached form.</p> <p>However, for the purpose of commenting the proposed SSD list, it would have been helpful to be provided also with the list of NSSD (non-significant standards differences). The frontier between SSD and NSSD is sometimes very thin, and we think we could have provided more efficient comments knowing both lists.</p>		Yes		Noted	Please see response to comment no 7.
11	Dassault-Aviation	General		<p>Dassault-Aviation agree with the content of this Certification Memo, with some comments identified below. However, for the purpose of commenting the proposed SSD list, it would have been helpful to be provided also with the list of NSSD (non significant standards differences). The frontier between SSD and NSSD is sometimes very thin, and we think we could have provided more efficient comments knowing both lists</p>		Yes		Noted	Please see response to comment no 7.
12	Dassault-Aviation	25.629 (d)		25.629 (d)(8)(i) is missing. Difference between FAR and CS : CS refers to 25.903 (d), not FAR		Yes		Not accepted	As 14 CFR 25.629(d)(8)(i) refers to 14 CFR 25.571(e), which includes uncontained engine failures, it is believed that CS 25.629(d)(8)(i) which refers to CS 25.571(e) and CS 25.903(d) is not any different.
13	Dassault-Aviation	25.631		25.631 is missing. CS requires bird strike to be considered at any point of the airplane.		Yes		Accepted	Please see response to comment 9 above.
14	Dassault-Aviation	25.813 (a)		25.813 (a): difference is limited to sub-paragraph (2) of 813 (a)		Yes		Accepted	The 'Comments' column has been updated.
15	Dassault-Aviation	25.1185 (a)		25.1185 (a) is missing. Difference between FAR and CS: CS addresses any tank or reservoir, whereas FAR excludes integral oil sumps specified in §25.1183(a)		Yes		Noted	Both CS/14 CFR 25.1185 (c) refer to CS/14 CFR 25.1183 (a). 14 CFR 25.1183 (a) indeed excludes integral oil sumps for reciprocating engines, however since CS-25 is applicable for large aeroplane with turbine engine, the requirements are equivalent.
16	Dassault-Aviation	25.1305 (a)		25.1305 (a): difference is limited to sub-paragraph (2) of 1305 (a)		Yes		Accepted	The 'Comments' column has been updated.
17	Dassault-Aviation	25.1355 (c)		25.1355 (c): reference to "this chapter" in FAR is understood as referring to chapter 14CFR, which covers TC as well as US operating rules.		Yes		Accepted	The SSD has been removed from the list.