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1	*Airbus*			Airbus is reluctant to accept the proposed CM as it is defined today with potential significant implications on the DOA and POA activities related to fasteners. A CM is supposed to provide guidance and complementary information for compliance demonstration, and is of non-binding character. However the result of this CM and the announced CARI could be a significant additional activity and cost for a DAH, for which a Certification memo is not considered the appropriate driver.	Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic.		Yes	Not accepted	The CM applies to new certification projects and interpretation of the existing requirements in the knowledge of the current quality of standard fasteners. In parallel, EASA is considering whether rulemaking activity is required, but this would not provide an appropriate level of safety in the short term.
2	*Airbus*			This proposed CM tries to correct issues with the fastener manufacturers more downstream in the use of these fasteners (DAH design, production, maintenance). Therefore the responsibility to correct any issue is put on the shoulders of those that are not involved in the fastener manufacturing. Airbus propose to put the EASA efforts more to the source, i.e. with closer control and oversight of the companies that produce the fasteners/bolts/ nuts.	Cancel Certification Memo. EASA to consider POA implications and increased oversight of POA/ Manufacturer of fasteners/bolts/nuts instead of issuing a design CM for the DAH		Yes	Partially accepted	In parallel, EASA will also consider the POA implications and it is expected that the oversight of standard parts suppliers be improved. The industry needs to take responsibility for this aspect. POA standard part quality control is centred on conformity through a documentation process. A POA has no data upon which to base conformity checks of a kind acceptable to a Design Approval Holder (DAH) as the extent of the checks required may be installation dependent. The DAH should select component specifications based on their knowledge of the controlled level of integrity in comparison with the hazard classification of the associated failure effect. Hence, for critical applications using standard parts this is directly a DAH issue.
3	*Airbus*			Many of the activities announced in the policy are linked to POA (additional conformity checks, batch controls, criteria for acceptance, criteria for storage of fasteners) and PART145/ Maintenance organisations, for which a CM seem not the appropriate driver as these are really production/ quality aspects. EASA should not try to solve production issues by issuing a design activity via this proposed CM.	POA and quality issues should not be addressed via Design CM. Cancel Certification Memo.		Yes	Not accepted	Some of the activities are indeed linked to POA and 145 requirements, but only the design organisation knows if additional activities are necessary and what they should be. DAH should define component specifications based on their knowledge of the controlled level of integrity in comparison with the hazard classification of the associated failure effect. Hence, for critical applications using standard parts this is a DAH issue.
4	*Airbus*			EASA should be aware that the contents of this CM could cause significant activities for a DAH, that could raise additional costs to both the DOA and POA organisation. A proposed cost assessment is not part of this CM as the CM is not supposed to be any new regulation. However, Airbus strongly encourage EASA to take this into account, balancing the significant additional costs for the DAH against any safety benefits to be gained. EASA SIB 2012-06 mentions that insufficient evidence is available to determine whether an unsafe condition exist.	Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic. Undertake a Cost/Benefit analysis of the proposed action. This should include effects on POA and Maintenance.		Yes	Not accepted Comment on SIB noted	Revision 2 of EASA SIB 2012-06 refers to AD's, that have been issued when an unsafe condition had been identified. For a new design the risk should be eliminated before approval. The CM is provided to help define activities related to existing requirements that should be undertaken by applicants.
5	*Airbus*			The EASA policy does not specify any approval or acceptance process with EASA. This adds to the concern of Airbus mentioned before about the cost aspects, including the unspecified time needed for the EASA review/ agreement/ approval process	Clarify approval process		Yes	Partially accepted	The CM will be included in the certification / validation processes through a dedicated CAI / CRI.

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6	*Airbus*			This proposed CM results in disharmonisation between EASA and other authorities, resulting in additional costs for European manufacturers having to apply this proposed CM	Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic. Harmonise proposals with FAA.		Yes	Not accepted	The CM is clarifying the existing requirements because safety issues have been identified. It should be considered for new designs requesting EASA certification / validation. Harmonization with FAA is on-going. After several fastener failures in critical installations, EASA cannot delay taking action any longer.
7	*Airbus*			Supplier standard parts is a worldwide activity. It is not clear how EASA will apply the proposed CM to the whole process including worldwide suppliers spares direct delivery to the operators.	Ensure proposal is practical in the international environment of aircraft operations and harmonised with other authorities. Ensure that DAH are not the only ones actioned, knowing that direct delivery to operators will not be addressed.		Yes	Not accepted	As described in the CM the parts will be qualified, where necessary, and specified in the type design by the DAH, thus covering also spares.
8	*Airbus*	3.1	8	3.1 does not clarify the applicability: is the EASA policy only applicable for new development programs, or has it a retrospective character also? Retrospective character should not be part of the Certification Memo. Anyhow, the majority of the comments below are applicable for both.	Clarify applicability		Yes	Partially accepted	The CM is applicable to new applications. As stated in the CM, EASA may issue a Continued Airworthiness Review Item (CARI) to TCHs to address the potential hazard for existing designs.
9	*Airbus*	1.4 2.1.5 3.1	6 7 8	CSXXX.607 text is not consistent with the CS25.607 a1 and a2 referring to other criteria. Moreover, is the list of critical installations and the reference to unsafe conditions from §3.1 linked to the criteria of CS25.607 a1 and a2, or those of CS25.603? This is not clear. The definition of critical installations in §1.4 is also not in line with usual criteria for the wording "critical".	Better define criteria for critical and include and ensure consistence with CS25.607 definitions.		Yes	Partially accepted	Definition of criteria for "critical" should be performed at the aircraft level by the DAH.
10	*Airbus*	3.1	8	Tens of Thousands fasteners exist in an aircraft for which a high proportion would be associated to aircraft primary structure. To perform the requested selection of critical fasteners could be a major activity with significant costs and Engineering activity	Ensure proposed solution is practical to implement and not an undue burden for DAH, Operators and Maintenance organisations. Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic.		Yes	Noted	The CM is revised to clarify that a variety of approaches may be taken to ensure appropriate selection and definition of fasteners and their quality control through production and service.
11	*Airbus*	3.1	8	What is the definition of "qualified standard fasteners" as referred to in §3.1? Existing standards in CS25 already provide the means to ensure "qualified standard fasteners" in the Type Design. CS25.603b request for approved specifications, CS25.613 request for design values that are based on statistical basis	Clarify definition of qualified standard fastener and ensure consistency with existing EASA terminology. Clarify that today fasteners when meeting CS25 requirements can be considered as qualified fasteners.		Yes	Partially accepted	Definition revised. Currently no additional means of conformance is provided by the DOA with respect to standard fasteners when used in compliance with CS-25, so the proposal from Airbus does not clarify the definition.
12	*Airbus*	2	7	Airbus questions the need for "appropriate measures for initial certification" as referred to in chapter 2. CS25.601, 25.603, 25.607, 25.613, and 25.625 already provide appropriate rules for creating safe designs. The additional measures proposed seem to really overshoot the in-service issues found that are mostly linked to fastener manufacturer problems.	Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic. If the issue is POA/ Quality related it should not be addressed via Design CM.		Yes	Not accepted	See response to comments #2 and #6.

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13	*Airbus*	3.1	8	Many of the risks for critical locations are negated by the existing CS25.607. For instance, the fact that FAR/CS25.607a and AC20-71 exist already mitigates many of the risks that EASA is concerned with for critical locations by design solutions. Even the AC refers to in-service issues as one of the drivers for the existence of the AC and FAR/CS25.607. Also AC20-71 accepts the principle of fail safety as a criterion to select critical areas, while the §3.1 excludes these considerations.	Ensure harmonisation with existing rules and guidance. Identify for which cases CS25.607a does not provide an adequate design solution		Yes	Partially accepted	The criticality of adequate design solutions is dependent on both the design itself and the potential failure modes of the fastener. EASA cannot identify in advance all inadequate design solutions. If the design solution offers redundancy and is not susceptible to common cause failure it would clearly be acceptable. A fail safety criterion, for instance considerable redundancy of fasteners, may be acceptable, but the likelihood of common cause failure and the probability of detection of failures should also be taken into account in the evaluation of whether a standard part is sufficient without further qualification.
14	*Airbus*	2.1.1	7	EASA refers to Part21.A.804(b) that states that authorised release documentation shall include the information that could not be marked on the part. As we are speaking about potentially ten thousands of fasteners affected, Airbus is very worried about this point and the practical implementation, and can see no MoC that is readily implementable	Ensure proposed solution is practical to implement and not an undue burden for DAH, Operators and Maintenance organisations. Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic.		Yes	Noted	The need to create a unique part number is envisaged to be limited to critical installations only and only where unique identification of the part is necessary. Solutions such as identifying fastener producers who apply the required checks to all the affected fasteners they produce may also be possible and is current practice in many cases.
15	*Boeing Commercial Airplanes*	All		The certification requirements currently in 14 CFR §25.607 and CS 25.607, as well as the guidance in AC 20-71, already sufficiently address the issue of standard fasteners in aircraft design and manufacture for all design approval holders (DAH). The addition of the recommendations in the proposed Certification Memorandum (CM) does not enhance the design and certification processes and are not viewed as being value-added. Additionally, the majority of the affected industry already employs standard part design specifications and processes, as well as internal and supplier quality oversight systems, that more than meet the intent of the proposed CM. Performing the design or airworthiness reviews listed in the proposed CM would be redundant of these current processes and certification efforts, would add unnecessary burden and costs to programs, and would not result in any appreciable increase in the current level of airplane safety.	The proposed Certification Memorandum, CM-S-003, Issue 1, should be withdrawn.		Yes	Not accepted	The CM is clarifying the existing requirements because safety issues have been identified. CS 25.607 is specific to locking devices and the effects of the environment on fasteners and their locking devices. See Comment #13 regarding general aspects of redundancy. Double locking features in compliance with CS 25.607 that are not susceptible to common cause failure are not in question. Experience has shown that in several cases, the existing quality systems have not prevented parts failing in critical installations. This does not mean EASA will not accept proven well managed supplier oversight systems that ensure controls exist for the critical characteristics of the standards as part of the substantiation for appropriate selection and use of standard fasteners.
16	*Eurocopter* *(comment shared with Airbus)*			Eurocopter is reluctant to accept the proposed CM as it is defined today with potential significant implications on the DOA and POA activities related to fasteners. A CM is supposed to provide guidance and complementary information for compliance demonstration, and is of non-binding character. However the result of this CM and the announced CARI could be a significant additional activity and cost for a DAH, for which a Certification Memo is not considered the appropriate driver.	Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic.		Yes	Not accepted	See response to comment # 1.

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17	*Eurocopter* *(comment shared with Airbus)*			Many of the activities announced in the policy are linked to POA (additional conformity checks, batch controls, criteria for acceptance, criteria for storage of fasteners) and PART145/ Maintenance organisations, for which a CM seem not the appropriate driver as these are really production/ quality aspects. EASA should not try to solve production issues by issuing a design activity via this proposed CM.	POA and quality issues should not be addressed via Design CM. Cancel Certification Memo.		Yes	Not accepted	See response to comment # 3.
18	*Eurocopter* *(comment shared with Airbus)*			This proposed CM results in disharmonisation between EASA and other authorities, resulting in additional costs for European manufacturers having to apply this proposed CM	Cancel Certification Memo, launch a rulemaking activity that better reflect on any potential safety issue (if any) and cost topic. Harmonise proposals with FAA.		Yes	Not accepted	See response to comment # 6.
19	*Eurocopter*			It is obvious (as reminded at the end of § 3.1) that standard parts cannot be used as critical parts, as defined in CS 27/29.602. Consequently, it is guessed that EASA concern is on the use of standard fasteners where they participate in the integrity of critical installations, although being not themselves critical parts. However, such concern seems already covered by the concept of two separate locking devices for fasteners used in critical installations, as defined in CS 27/29.607 and associated AMC (AC 27/29.607 and AC 20-71).	Ensure harmonisation with existing rules and guidance. Identify for which cases CS 27/29.607 do not provide an adequate design solution.		Yes	Partially accepted	Clarification for applicants has been found to be needed with respect to the intent of the critical parts requirement. For fasteners the failure of which could be catastrophic it is highly likely that they will have critical characteristics such as fatigue strength or reliability objectives related to their function that need to be identified. Processes that might affect these characteristics must be controlled by the TCH's critical parts plan to ensure the required level of integrity. Standards associated to standard parts do not rely on frozen manufacturing and design change processes that are normally used to ensure the level of reliability demanded for critical parts. Redundancy of fasteners does not automatically negate the need to qualify the fasteners as all the fasteners on a joint could originate from a common defective batch. Required double locking functions on fasteners may also need qualified standard fasteners to ensure the fail safe design philosophy is maintained when that locking function is susceptible to common cause failure. Text revised to express this more clearly.
20	*Eurocopter*	1.4	6	Critical installations are defined as "Structural/mechanical assemblies including fasteners the failure of which (single or multiple due to common cause) is classified as hazardous or catastrophic." In order to be in line with rotorcraft certification specifications (CS 27.602 and 29.602), "critical" should be associated to catastrophic failure conditions only, not to hazardous or catastrophic.	Proposed definition: "Structural/mechanical assemblies including fasteners the failure of which (single or multiple due to common cause) is classified as catastrophic"		Yes	Not accepted	CS 27/29.601(a) and CS 27/29.607(a) address any fastener whose loss could jeopardise the safe operation of the rotorcraft and are therefore one of the relevant reference points for the CM needing to address both hazardous and catastrophic scenarios rather than just catastrophic ones. The use of the term critical is in relation to the definitions provided in this CM. Also, this CM is applicable to fixed wing applications as well as rotorcraft.
21	*Eurocopter*	2.1	7	The listed requirements do not totally reflect the requirements in all CS, especially: - § 2.1.3: the "critical parts" concept is also defined in CS-E and CS-P, although not strictly identical, - § 2.1.4: analogous texts can also be found in § 23.603, 27.603 and 29.603, - § 2.1.5: the extracted text can only be found in § 27.607 and 29.607, although analogous texts can be found in § 23.607 and 25.607.	Either extract texts from the other CS or indicate when equivalent texts can be found in other CS.	Yes		Not accepted	The intent of § 1.2 References is to present equivalent CS requirements. Equivalent text can be found in the list of requirements not marked with ".---". CS marked with ".---" are indicating that no requirement exists (as also defined under § 1.4. Definitions).

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22	*Safran MBD*	3.1	8	The EASA policy provides guidance for appropriate actions, in parallel we just received the SIB 2012-06R2 which defines actions required by EASA for the uses of self-lock nuts.	Include the requirements of the SIB in that proposed CM-S-003.			Not accepted	The SIB – which provides non-mandatory continued airworthiness information (Non-MCAI) – is intended to be followed by a CARI (continued airworthiness review item). The CM provides initial airworthiness guidance. Some of the SIB recommendations could be adapted by the DAH for qualification of fasteners.
23	*Safran MBD*	3.1	8	There is no requirement about equipment already delivered to end users with fasteners which did not follow this inspection policy.	Define the policy to apply for equipment already delivered.			Not accepted	See response to comment # 8.
24	*Safran MBD*	2	7	In the background the following observation « Within the last few years an accumulation of failed standard fasteners (nuts and bolts) in aviation has been observed (refer to EASA Safety Information Bulletin 2012-06). The failures occurring in high strength steel fasteners **may happen immediately after installation or in a worst case after only a few flight cycles**" tells that the failures appears quickly, is it possible to conclude that after many cycles this failure scenario is no more applicable?	Define if possible that after many cycles there is a risk mitigation for the rupture of the nut.			Noted	Unfortunately it is not possible to conclude, after how many cycles this failure scenario is no longer applicable. A risk mitigation would not be an option to be a replacement for a qualification of standard fasteners.
25	*Cessna Aircraft Company*	All		The primary concern on the part of EASA is that the fasteners in question do not meet the engineering requirements of the fastener standards. Non-conformance to type design is an indication of a Quality system failure, rather than a deficiency in engineering requirements. Imposition of the recommended actions via engineering requirements will result in a significant burden to OEM's. The recommended actions include Engineering qualification of standard fasteners, imposition and maintenance of qualified producers lists, added fastener quality inspections/testing, changing maintenance manuals to ensure only qualified fasteners are used, and implementing a logistical system to provide qualified fasteners to the field.	It is our opinion that this issue should be addressed via enhancements in manufacturer oversight by Quality organizations and enforcement of current engineering requirements.			Partially accepted	The proposed solution may in the medium to long term be viable. In the short term, however, it is necessary to drive these actions through the responsibilities of the TCH considering the criticality of affected installations. Current quality assurance is often only done by the parts manufacturer and experience shows it does not work to a level acceptable in critical installations. The extent to which an OEM is impacted will depend on whether the OEM has a robust process for selection of design standards and their use and control of standard parts. The need for and type of additional qualification depends on the criticality of the installation and characteristics of the part that may need to be controlled. Oversight responsibility for the quality of any part lies with the approved production organisation and this may require inputs from the design approval holder to ensure the definition of quality controls and product design standard are appropriate for the final use of the part on the product.
26	*Rolls-Royce Deutschland*	1.4	6	What defines a "qualified standard fastener"? Can this be done by suppliers?	Clearer definition of "qualified standard fastener".	No	Yes	Partially accepted	Definition adapted. Refer to 1.4 Definitions. Chapter 3.1 clarifies the means to qualify the parts. Corresponding tests and/or inspections can then be conducted by the suppliers/MOA/POA.
27	*Rolls-Royce Deutschland*	1.4	6	What does EASA mean by saying "qualified" in relation to our design and material specifications and design standards, all of which are directly or indirectly approved by EASA?	Clearer definition of "qualified standard fastener".	No	Yes	Accepted	Qualified can mean any additional step specified or acceptable to the TCH beyond the standards called by the standards associated to the standard part. Definition adapted.
28	*Rolls-Royce Deutschland*	2	6	The general retrospective application to legacy products is not appropriate.	Retrospective application to legacy products only where reasonably practicable and required.	No	Yes	Noted	The CM is addressing new certification only. (See also response to Comment # 8.) The implementation of EASA policy on legacy products will take into account this comment.

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29	*Rolls-Royce Deutschland*	2.1.5	7/8	Need to be clear what "jeopardise the safe operation" means?	Provide clear definitions in line with e.g. 25.1309.	No	Yes	Noted	Refer also to response to comment # 20. Jeopardise is existing CS wording; that within the frame of the CM means hazardous or catastrophic failure conditions.
30	*Rolls-Royce Deutschland*	3.1	8	Whilst a definition of a "critical installation" is offered, there is no attempt to define "critical location" or "critical assembly".	Provide clear definitions in line with e.g. 25.1309.	No	Yes	Accepted	"critical locations/assemblies" replaced by critical installations.
31	*Rolls-Royce Deutschland*	3.1	8	What does "list of parts" mean exactly? They are part of our Bill of Material (Drawing Introduction Sheet - DIS) and we list them as line items in the FMECA (w/o part numbers). Is that sufficient to EASA ?	Clarification required.	No	Yes	Partially accepted	The intent is, for the DAH, to create a list of critical installations, where only qualified standard fasteners may be used. The text has been revised to address this.
32	*Rolls-Royce Deutschland*	3.1	8	"Replacement of qualified fasteners by qualified fasteners" - qualified by whom, if not the OEM? Qualification requirements?	See Items 1 and 2.	No	Yes	noted	See response to comment #26 (item 1) and comment #27 (item 2).
33	*Rolls-Royce Deutschland*	1.4	6	The definition of a Standard fastener refers to "not directly approved by the agency" – this then implies a Qualified Standard Fastener is directly approved by the agency.	The need for Qualified Standard Fastener to be approved (or not) by the agency should be clearly stated.	Yes	No	Accepted	The qualified standard fasteners and standard fasteners are part of the approved type design and as such may be investigated by the Agency through the certification process but are not directly approved in any separate process.
34	*Rolls-Royce Deutschland*	2	6	The term "deviations from standard" could refer to inherent manufacturing variability and/or manufacturing errors/flaws – the intent should be more clearly stated.	Provide additional clarification to be clear what is meant by "deviations from standard".	No	Yes	Accepted	The term "Deviations from the standard" is intended to primarily address manufacturing errors/flaws. However, it also has the objective of ensuring that the inherent variability associated to the standard is understood. Based on recent experience, consideration should be given to probable manufacturing flaws and errors that are not prevented or detected by the processes currently associated to the standard. The qualification of all parts should ensure control of manufacturing variability to a level that is compatible with the intended function.
35	*Rolls-Royce Deutschland*	1.4	6	The DAH providing the means of conformance verification to the POA and DOA surely does not define a Qualified Standard Fastener.	Not clear what the POA and DOA is required to do with the means of conformance verification provided by the DAH. Surely it would be better to describe these parts as fasteners that require verification of their compliance to specification, and control of their source and method defined by the DAH.	No	Yes	Accepted	CM definition changed to clarify intent. Standard fasteners that require additional verification of compliance to specification and control of their source, by methods defined by the DAH. Corresponding tests and/or inspections can then be conducted by the suppliers/MOA/POA.
36	*Rolls-Royce Deutschland*	2.1	7/8	Having confirmed the Purpose and Scope covers CS-E and CS-P and both are listed in the References section, it is not clear why there isn't an extract from both of those specifications in section 2.1?	Include appropriate extracts of existing CS-E and CS-P specification requirements in section 2.1, or include comment to state why they are not included.	No	Yes	Noted	The intent of § 1.2 References is to present all equivalent CS requirements. Chapter 1.4 Definitions explains the designators for ".---" which is applied under 1.2. For reasons of clarity we have reduced the amount of cited requirements by using representative examples.
37	*Rolls-Royce Deutschland*	2.1.3 and 2.1.5	7	The use of "XXX" in the subtitles is implied rather than explicitly stated.	The use of "XXX" should be clear.	Yes	No	Accepted	The CM text had been changed under chapter 1.4 Definitions by adding a definition for the place holder "XXX".
38	*Rolls-Royce Deutschland*	2.1.5	a	Within the text of this paragraph, it seems this requirement only applies to rotorcraft.	Make this clearer in the paragraph 2.1.5 heading.	No	Yes	Accepted	Text of CM has been revised to provide clarity.

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39	*Bombardier-Shorts*	1.1 1.4	4 6	"standard fasteners" as written 1.1, not defined in 1.6	Use same actual words	Yes	No	Accepted	Definition table 1.4 revised. Standard fasteners. Meaning. Fasteners that are standard parts. Fasteners (nuts and bolts) being produced according to a certain standard which is not directly approved by the agency. They fall within the category of standard parts as defined in Commission Regulation (EU) No 748/2012 21.A.303(c).
40	*Bombardier-Shorts*	2	6	"Deviations from the standard.." is presumably intended to reflect manufacturing errors – given that "standard parts" will have been selected by the DAH in the expectation that minimum declared standards are achieved, and that only parts meeting or exceeding these standards are acceptable for use in the type certificated product, the DAH has already taken "appropriate measures"	Agency should take "appropriate measures" with POAs and MROs to ensure there are no Quality system drop-offs within POAs and MROs in terms of obtaining satisfactory evidence from their selected supply base that the standard parts they buy-in have been certified to the Engineering specified standards which have already been reviewed as part of the design approval process and deemed to be suitable	No	Yes	Partially accepted	See response to comment # 2
41	*Bombardier-Shorts*	2	6	Retrospective application by way of a CARI is not appropriate	The "issue" should be addressed at source within the Supply Chain/MRO/POA environment	No	Yes	Not accepted	The CARI is not the subject of this CM and the extent of its application will depend on the risk posed to continued airworthiness by parts already in use or in the supply chain.
42	*Bombardier-Shorts*	3.1	8	As written, it appears that the Agency is promoting action by DAHs because of issues in the Production / Maintenance / Supply Chain environments.	Issues in the Production / Maintenance / Supply Chain environments should be addressed by the appropriate oversight body (EASA and/or NAA)	No	Yes	Partially accepted	See response to comment #2 and comment #40. Please note that the POA and MOA also have responsibility for the condition and quality of the parts fitted to a product.