

Deviation Request ETSO-C2d#2 revA for an ETSO approval for CS-ETSO applicable to Airspeed Instruments (ETSO-C2d) Consultation Paper

1 Introductory Note

The hereby presented deviation requests shall be subject to public consultation, in accordance with EASA Management Board Decision No 7-2004 as amended by EASA Management Board [Decision No 12-2007](#) products certification procedure dated 11th September 2007, Article 3 (2.) of which states:

“2. Deviations from the applicable airworthiness codes, environmental protection certification specifications and/or acceptable means of compliance with Part 21, as well as important special conditions and equivalent safety findings, shall be submitted to the panel of experts and be subject to a public consultation of at least 3 weeks, except if they have been previously agreed and published in the Official Publication of the Agency. The final decision shall be published in the Official Publication of the Agency.”

2 ETSO-C2d#2 revA Airspeed Instruments

This deviation is an update of already approved deviation C2d#2, published in [ETSO.DevP.02](#) in 2007 and for which EASA received a comment. This deviation ETSO-C2d#2 revA supersedes preceding deviation ETSO-C2d#2.

2.1 Summary of Deviation

Deviates from SAE AS8019 §3.2.3 to not display Instrument Title and unit of measure for instruments indicating Airspeed always in the same unit of measure.

2.2 Original Requirement

SAE AS8019 §3.2.3 states:

“Instrument Identification: The instrument face shall be marked with "Airspeed" or "IAS" and also with the units of measure applicable to the instrument.”

2.3 Industry

The data is presented on a display in industry standard format following the conventional “basic T” arrangement for display instruments and is consistent with other flight deck instrumentation to minimise potential confusion without said labelling.

Additionally ARP4102-7 does not recommend labelling of the function or units for airspeed.

The airspeed unit of measure is not selectable from the user.

2.4 Equivalent Level of Safety

The display presents a scrolling Airspeed tape with digital readout in a standardized format and a standard location that does not need the specific label of Airspeed. The Airspeed tape is presented directly to the left of the Attitude indicator on the display consistent with other primary flight display information.

An equivalent level of safety is provided by ensuring that the Airspeed information on the display is in a similar arrangement to the one of the Primary Flight Instruments and is always indicated in the same unit of measure.

Additionally ELOS to not display the unit of measure is achieved if the installation Manual, User Manual and DDP clearly indicate the unit of measure for the installer, with a limitation of installation “ the equipment shall be installed only in flight deck system using Airspeed indication being “xxxx”* ”.

(*) : please replace xxxx by the applicable unit of measure: mph, km/h, or knots.

2.5 EASA position

We accept the deviation.