

EASA Proposed CM-PIFS-006 Issue 01 – Guidance for Rain and Hail Ingestion Testing for Turbine Engines - Short Hail Burst - Comment Response Document

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	UK CAA			No comments					
2	Rolls-Royce plc			The Certification Memorandum seeks to introduce new guidance material and requirement change to CS-E 540(b) and effectively CS-E 790, i.e. additional test requirements to specifically address short term high intensity hail storm encounters. This is effectively rulemaking and therefore surely outside the defined scope of a certification Memorandum: "Certification Memoranda are not intended to introduce new certification requirements or to modify existing certification requirements and do not constitute any legal obligation"		No	Yes	Not Accepted	<p>As identified within the purpose and scope of the Certification Memorandum, the purpose of this Certification Memorandum is to provide specific guidance to applicants for showing compliance with CS-E 540 (b):</p> <p>"The Engine must be designed so that the strike and ingestion of foreign matter that is likely to affect more than one Engine in any one flight will not preclude the continued safe flight and landing of the aircraft as a consequence of a Hazardous Engine Effect or an unacceptable:</p> <p>(1) Immediate or subsequent loss of performance;</p> <p>(2) Deterioration of Engine handling characteristics;</p> <p>(3) Exceedance of any Engine operating limitation."</p> <p>This Certification Memorandum describes how to complement the AMC to CS-E 540 (b) in demonstrating compliance with the requirements of CS-E 540.</p> <p>Experience has shown that the requirements of CS-E 790 and the guidance material contained in AMC E 790 may not address the threats posed by high intensity hail bursts. Given that the threat exists, both FAA and EASA have decided to pursue non-binding policy material. The Certification Memorandum as issued by EASA for safety and harmonization reasons is at the same regulatory level as published by the FAA.</p> <p>This Certification Memorandum therefore attempts to provide additional guidance to applicants in order to consider the threat posed by short hail bursts when developing their compliance plans for CS-E540.</p> <p>The intent of this Certification Memorandum is in line with the preamble contained on page 1 of the Certification Memorandum:</p> <p>"EASA Certification Memoranda clarify the European Aviation Safety Agency's general course of action on specific certification items. They are intended to provide guidance on a particular subject and, as non-binding material, may provide complementary information and guidance for compliance demonstration with current standards. Certification Memoranda are provided for information purpose only and must not be misconstrued as formally adopted Acceptable Means of Compliance (AMC) or as Guidance Material (GM). Certification Memoranda are not intended to introduce new certification requirements or to modify existing certification requirements and do not constitute any legal obligation."</p>