

EASA Proposed CM-PIFS-008 Issue 01 – Regulatory Differences CS-E vs CFR 14 Part 33 (for validation by EASA of FAA certified engine types) - 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	Airbus	Annexes	6, 7	The tables provide lists of the regulations where there are regulatory differences. They would be more useful if they contained even brief descriptions of what the differences are and the implications of these differences.	Addition of descriptions of what the differences are and the implications of these differences.	Yes	No	Not Accepted	The tables are provided to establish the Certification Basis for the benefit of applicants who require EASA validation of FAR Part 33 approved engines. Where a requirement or subpart is listed then compliance with that requirement or subpart is required in full. If further refinement to this is required then that has been included in the remarks column. For this purpose the contents are considered sufficient.
2	Rolls-Royce plc	Appendix A	6	Whilst the SD and VI's have been identified/tabulated, some simply point to a complete regulation that may comprise many paragraphs (the majority of which are not the reason for the SD or VI). It is therefore important to be clear to the reader just what the notable difference is that is being highlighted/to be addressed - this should be detailed in the Remarks column to ensure clarity without any misunderstanding, rather than relying on the reader to rely on their own interpretation.	Use existing Remarks column to spell out the regulatory differences that are being highlighted.	Observation and suggestion	Substantive	Partially Accepted	The comments may be true for some older lists; many of these are unlikely to be used again however. In the case of the most recent listings where whole requirements have been quoted then the whole requirement is considered to be required. It is therefore considered that no change is necessary to the remarks column. Applicants who for whatever reason may require further details as part of their validation programme will be able to discuss this directly with their assigned EASA PCM.
3	UK CAA			No comments.		---	---	Noted	