Comment				Comment summary	Suggested resolution	From the commenter point of view a modification of the published text is*: -Not requested; - Recommended; -Requested	EASA comment disposition	EASA response
NR	Name of the organisation commenting	Section, table, figure	Page					
1	*FOCA*			*Following a review of the subject concerning an application for a major change to a Type Certificate for large aeroplanes, the proposed design change relates to the installation of an APR thrust control system. This system is designed to automatically increase the thrust of the operative engine in the event of an engine failure during take-off.* *Provided that all applicable requirements and means of compliance are addressed to ensure that the system operates in accordance with the specifications approved as part of the major modification certification process, including the ability to deactivate the automatic function at any time, the FOCA Airworthiness Department fully supports the incorporation and certification of this design change during the manufacturing and production process of the aircraft type design.* *However, for any subsequent retrofit installations involving this major type design change, the introduction of such a modification is not recommended. This recommendation takes into consideration aircraft that have already been designed and certified without a means of deactivating the automatic function. This includes the aircraft models and their respective certifying authorities listed on page 3 of the consultation paper.* *This approach would provide an equivalent basis for addressing the safety findings while limiting the implementation.*	*The introduction of such a modification in retrofit is not recommended.*	Recommended	Not Accepted	Thank you for your review and for your support on the ATTCS installation concept. EASA would like to clarify that the ATTCS function as currently defined is intended to be available both for linefit and for retrofit installation. In this respect, EASA do not see a safety basis to distinguish between the two installation paths, provided that the complete certified ATTCS standard is embodied on the aircraft. When ATTCS is installed in retrofit, the certification approach and level of demonstration remain the same as for an installation embodied during production. In other words, retrofit installation of ATTCS is not considered a partial or alleviated implementation: the same applicable requirements, the same means of compliance, and the same adherence to the relevant ESF conditions must be met before approval of the modification. More specifically: • ATTCS can only be installed if the aircraft incorporates the necessary prerequisite modifications and system standards required for proper operation of the function. • If those prerequisites are not embodied, ATTCS cannot be installed and hence not activated. • Once the full ATTCS configuration is installed and activated, the aeroplane is compliant with the same certification basis and the same ESF compensating factors, irrespective of whether the embodiment occurred in production or through retrofit. For these reasons, EASA do not support a general recommendation to exclude retrofit installations as a matter of principle. Therefore, the text of the ESF has not been changed based on this comment**.**
2	*DGAC-FR*	ABBREVIATIONS	2	Abbreviation : abbreviations that are not used in the document (FHA, MMEL, SSA et TOGA) should be removed in order to avoid confusion.	Remove unused abbreviations.	Recommended	Accepted	The comment is accepted. The chapter on "Abbreviations" has been updated accordingly.
3	*DGAC-FR*	§ 3. e) 1	5	The meaning of "*safety-significant*" could be more explicit (making reference to a source document for guidance/assessment for instance). Regarding the consequences, if the consequences must be less than or equal to Major (and not strictly less than), me way suggest to rephrase as "*Show that the criticality of the consequences of the failure conditions is no more than "Major";*	Refer to comment.	Recommended	Accepted	The intent of paragraph (e)(1) is to limit the acceptable failure consequences to those classified as **Minor** or **No Safety Effect**; this is also the intended interpretation of the term **"not safety-significant"**. Failure conditions with a higher severity classification should instead be assessed under paragraph (e)(2). Please note that the wording **"not safety-significant"** is harmonised with terminology used by other authorities in similar contexts; see, for example, ELOS AT10219IB-T-P-12 and ELOS AT2587NY-T-P-5. The text of the ESF has been updated to clarify the intended interpretation of the terminology used.

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4	*DGAC-FR*	§ 3.e) 2	5	It could be useful to add a short definition of the manual deactivation means in order for instance to avoid any confusion with “disconnect” means/function.	Refer to comment.	Recommended	Accepted	The term “**manual deactivation means**” is used consistently with the terminology “means for the flight crew to deactivate the automatic function” used in CS-25 Appendix I, 25.6(c)(2) and should be interpreted accordingly. In this context, it refers to the **physical means** provided to the flight crew **to disable the automatic function** of the ATTCS. The text of the ESF has been updated to clarify the intended interpretation of the terminology used.

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