EASA Proposed CM-CS-001 Issue 01 – Use of Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12 – 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	*CAA UK*	Overall	Overall	CAA UK has no comment on the proposed Certification Memorandum.				Noted	
2	*AIRBUS*	3.1 First sentence	5	In the sentence: "EASA concurs with the content of FAA Policy Memo ANM–01–01 and therefore recognizes as equivalent to the test methods of CS-25 Appendix F the test methods described in the latest revision issued by the FAA of the following Chapters of the Aircraft Materials Fire Test Handbook DOT/FAA/AR-00/12" Does this "latest revision" refer to the one posted on the FAA-TC website?	Please clarify whether the term "the latest revision" applies to the revisions made by the FAA-TC and posted on fire safety branch web site.			Accepted	The text of the Certification Memorandum will be revised to include the clarification proposed by Airbus.
3	*Sabena Technics BOD*	3.1	5	Starting Chapter 6, the subsequent chapters listed do not match the content of Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12. For example Chapter 7 should be Oil Burner Test for Seat Cushion instead of Oil Burner Test for Cargo Liners. For information, same mistake already exists in Attachment to FAA memorandum 00-115-16.	The list of Chapters should be in accordance with the page iv of Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12	X		Accepted	The text of the Certification Memorandum will be revised to include the correct reference to Chapter 7 and Chapter 8 of the Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12.
4	*Sabena Technics BOD*	3.1	5	The Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12 gives in its Appendix F a list of Laboratories actively using the fire test procedures from the handbook.	It is suggested that EASA give credit to these laboratories. This could be supported by the EU and US cooperation agreement on civil aviation safety.	X		Not accepted	EASA disagrees with the proposed change. EASA is not responsible for the qualification of test facilities. Each Design Organization has to qualify test facilities in accordance with its own applicable procedures.
5	*Sabena Technics BOD*	3.1	5	The FAA memorandum ANM-115-09-XXX provides guidance on acceptable methods of compliance with flammability requirement.	As the acceptable methods of compliance of the FAA memorandum ANM-115-09-XXX have already been accepted by EASA through Certification Review Items, it is suggested to add the reference to this memorandum as guidance for the determination of materials subject to flammability testing.	X		Not accepted	EASA disagrees with the proposed change. The scope of the Certification Memorandum is to allow the use of test methods described in the Aircraft Materials Fire Test Handbook DOT/FAA/AR-00/12. As soon as FAA Policy Memo ANM-115-09-XXX is officially released, an equivalent EASA Certification Memorandum will be issued.
6	*Rolls-Royce Deutschland*	DOT/FAA/AR-00/12		Only a large fuel burner is mentioned for fire tests on relative large components.	Industry standard is large gas burner in accordance with ISO2685.		X	Not accepted	The test methods described in Chapters 11 through 14 of the Aircraft Materials Fire Test Handbook DOT/FAA/AR-00/12 are related to powerplant. They are not addressed and not referenced in the Certification Memorandum.
7	*Rolls-Royce Deutschland*	DOT/FAA/AR-00/12 Chapter 11.5		Turnoff of burner between temperature and heat flux calibration is allowed. This is in contradiction with industry fire test procedures and in contravention of AC20-135 and current industry practice (Airbus generic fire test specification and Boeing fire testing using AS 1055).	Turnoff of burner between temperature and heat flux calibration is not allowed.		X	Not accepted	See response to Comment #6.
8	*Rolls-Royce Deutschland*	ISO 2685		The average temperature measured of the flame must be at least 1100 °C, not 1100 ± 80 °C as is mentioned in ISO 2685.		X		Not accepted	See response to Comment #6.
9	*Rolls-Royce Deutschland*	DOT/FAA/AR-00/12 Chapter 11.6.2		Oil flow through hoses for fire test is based on hose type/size, not minimum normal operating conditions/worst case. This is not in accordance with SAE AS150 Revision E.	Meet requirements of SAE AS150 Revision E.		X	Not accepted	See response to Comment #6.

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10	*Rolls-Royce Deutschland*	DOT/FAA/AR-00/12 Chapter 14		Only compliance with fire resistant standard is assumed for wires. There is probably no requirement for fireproof standard of wiring connected to fire detection elements or other systems which may have a function after engine shutdown. Fire detection has a function after engine shutdown because of: - Persisting fire warning for second shot, ~ one minute after first shot. - Persisting fire warning may be reason for emergency procedures after landing.	Consider need for fireproof wiring	X		Not accepted	See response to Comment #6.
11	*Airworthiness Office KLM*	3.1	5	Chapter 7 - The Oil Burner Test for Seat Cushions (ref. 25.853) is missing.	Add Chapter 7 - The Oil Burner Test for Seat Cushions (ref. 25.853)	Observation	Substantive	Accepted	See response to Comment #3.
12	*Airworthiness Office KLM*	3.1	5	Number of current Chapter 7 (The Oil Burner Test for Cargo Liners specified in § 25.855 and Appendix F of Part 25) is not correct.	Revise Chapter number from 7 to 8 as follows: Chapter 8 (The Oil Burner Test for Cargo Liners specified in § 25.855 and Appendix F of Part 25)	Observation	Substantive	Accepted	See response to Comment #3.
13	*Recticel*	Overall	Overall	The EASA Certification Policy differs from the FAA Policy Memo ANM-01-01. Chapter 7 is about the Oil Burner Test for Seat Cushions, and not the Oil Burner Test for Cargo Liners.Chapter 8 is about the Oik Burner Test for Cargo Liners				Accepted	See response to Comment #3.