Deviation Request ETSO-C112e#1 for an ETSO approval for CS-ETSO applicable to Secondary Surveillance Radar Mode S Transponder (ETSO-C112e)
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-C112e Secondary Surveillance Radar Mode S Transponder

2.1   Summary of Deviation

Deviate from ETSO-C112e, section 3.1.1 c., section 4.2 and Appendix 1 by using RTCA DO-181E in lieu of EUROCAE ED-73E.

2.2   Original Requirement

CS-ETSO Amendment 17, ETSO-C112e section 3.1.1 — Minimum Performance Standard:
Standards set forth in the EUROCAE ED-73E, Minimum Operational Performance Standards for Secondary Surveillance Radar Mode S Transponders, dated May 2011 as amended by Appendix 1 to this ETSO.

2.3   Industry

EUROCAE ED-73E and RTCA DO-181E are harmonised and technically equivalent. This is acknowledged in section 3.29.3.2.2 of ED-73E and section 2.2.24.3.2.2 of DO-181E, where both standards result in compatible implementations to the Mode S Subnetwork. Thus, both documents implement the same edition of ICAO Doc 9871.

2.4   Equivalent Level of Safety

EUROCAE ED-73E is technically identical to RTCA DO-181E. Issuing of standards revisions is harmonised between the two standards bodies.

2.5   EASA position

We accept the deviation.