

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion (Y/N)	Comment is substantive or is an objection (Y/N)	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	GAMA	2	4	<p>This statement in section 2 of the CM could be interpreted incorrectly: <i>During the initial deployment, Data Link services were supported by only one frequency, known as 'Common Signalling[sic] Channel' (CSC). Afterwards, additional frequencies have been deployed on the ground in order to increase capacity.</i></p> <p>The term "On the ground" can be ambiguous. An appropriate replacement would be "by the ground stations" or more accurately "by the CSPs (Communication Service Providers)". The reasoning is that there are 2 types of additional frequencies being deployed by the CSPs. These additional frequencies which are tuned using multi-frequency are classified in the VDL Mode 2 standards as a ground (terminal) frequency or an air (en route) frequency. Using "On the ground" could be mistakenly interpreted that only ground (terminal) frequencies are being deployed.</p>	Replace 'on the ground' with 'by ground stations' or more accurately 'by the CSPs (Communication Service Providers)'	Y	N	Accepted	The phrase 'on the ground' will be replaced by 'by the CSPs (Communication Service Providers)'.
2	AIRBUS	3	5	<p>Airbus concurs with the intent of the certification memo and the future CS ACNS amendment clarifying the requirement for aircraft to be multi frequency when having to comply with EC 29/2009 regulation.</p> <p>Airbus understands that:</p> <ul style="list-style-type: none"> - it applies for airworthiness approval of new DLS installation or modification of the VDL Mode 2 functionalities design of existing DLS installations (actually, for most architectures, the MF capability is supported by the CMU, the radio equipment has just to be VDL Mode 2 capable); - (future) airworthiness requirement is for aircraft to be MF capable and that ARINC 631-6 is one acceptable means of compliance. It has to be noted that ARINC 631-5 should be considered as acceptable as well since it provides only with regard to MF capability; - already certified DLS installations for which MF capability was demonstrated using previous revision of ARINC 631 (i.e. 631-5) are not impacted and still comply with the EC 29/2009 requirement for MF capability. 	N/A	Y	N	Noted	The Airbus understanding is correct.
3	GAMA	3	5	<p>This statement in section 3 of the CM is a little hard to follow:</p> <p><i>Note - Applicants for airworthiness approval of changes to, or new installation of, ACARS operating the frequencies allocated to VDL M2, on aircraft exempted from having to comply with the European Data Link Services rules are recommended to also consider implementing multi-frequency functionality.</i></p>	Applicants for airworthiness approval of any installations which support data link applications which communicate over VDL Mode 2, including those not currently defined in CS-ACNS, are recommended to also consider implementing multi-frequency functionality.	Y	N	Partially accepted.	The note will be rephrased as follows: <i>Note - Applicants for airworthiness approval of any installations which support data link applications which communicate over VDL Mode 2, including those not currently defined in the DLS Regulation (e.g. ACARS), are recommended to also consider implementing multi-frequency functionality.</i>