

Comment				Comment summary	Suggested resolution	Comment is an observation (suggestion)	Comment is substantive (objection)	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	AIRBUS	Footnote 5	7	The Large Aeroplane requirement, CS 25.1447(d), prescribes the oxygen minimum mass flow rate if first-aid oxygen equipment is installed.	Airbus proposes to correct the First aid oxygen flow rate that is defined by CS 25.1443 (d) and not CS 25.1447 (d)		Yes	Accepted — The comment is agreed by the Agency and any <u>proposed amendment is wholly transferred to the revised text.</u>	It was a type mistake. EASA intended to cite CS 25.1443(d) as proposed by the commenter.
2	AIRBUS	Section 4.2	9	1 Any composite cylinder qualified according to ISO-11119-2 or -3 standards. As of today, only fully wrapped composite cylinders shall be is considered since when extensive comparison data exists for DOT CFFC/DOT FRP-1 fully-wrapped composite cylinders tested according to the counterpart ISO 11119-2 standard. This does not rule out the possibility that in future, when sufficient data may be available, ISO standard 11119-1 could also be included.	The composite cylinders as installed by Airbus are either fully wrapped cylinders or hoop wrapped cylinders. Both types of cylinders are extensively installed in Airbus aircraft. The Hoop wrapped cylinders are in operation in Airbus aircraft since at least 10 years. The fully wrapped cylinders are approved according to DOT-SP-10915 or DOT-SP-8162. Hoop wrapped cylinders are approved according to DOT-SP-10945. As there is extensive knowledge on these cylinders and AIRBUS never encountered any problems ISO 11119-1 standard is applicable for hoop wrapped composite oxygen cylinders. Airbus request that composite oxygen cylinders qualified according to ISO 11119-1 standard shall also be considered as acceptable standard and to be mentioned accordingly in this proposed CM.		Yes	Accepted — The comment is agreed by the Agency and any <u>proposed amendment is wholly transferred to the revised text.</u>	EASA understands the commenter' remarks. In the lack of negative in-service history, EASA accepts to consider for installation also the composite cylinders according to standard ISO 11119-1. CM text will be accordingly amended.
3	AIRBUS	Section 1.2	3	Table reference (8) ETSO-2C121	Airbus remark: The correct Reference is ETSO 2C 512	Yes		Accepted — The comment is agreed by the Agency and any <u>proposed amendment is wholly transferred to the revised text.</u>	It was a type mistake. EASA intended to cite ETSO 2C512 as proposed by the commenter.
4	AIRBUS	Section 3.1	8	Text: Oxygen is highly regulated because, as an oxidizer, "it can an existing fire " and can support the combustion of some types of flammable material, whether or not an ignition source is present.	Airbus remark: "It can an existing fire" is only a part of a sentence. It should be probably something like " it can increase the severity of an existing fire " Secondly, Airbus request EASA to reconsider if "combustion" really exist in an oxygen system without the availability of an ignition source? As, this would mean auto ignition.	Yes	Yes	Partially accepted — The comment is only agreed in part by the Agency. A text amendment will be proposed for comment 2.	1. Comment: sentence not clear Again a type mistake (due to track change problem?). The sentence was originally as follows: "...it can enhance an existing fire..." Anyway, since the meaning of the original text is sufficiently clear, <u>the change proposed by the commenter is not incorporated.</u> 2. Comment: material auto-ignition capability The auto-ignition capability of certain material (especially non-metallic but not exclusively) in presence of 100% oxygen at high pressure/temperature (stress risers) is a fact and in-service experience demonstrated such treat. This is why EASA requests applicant to perform an OFRA – Oxygen Fire Risk Analysis. Nevertheless, EASA understands the remarks from the commenter when the CM states: "(oxygen) can support the combustion of some types of flammable material, whether or not an ignition source is present ".

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									Indeed, this is not literally correct without clarifying other concurrent conditions. On the other side, any material has an auto-ignition temperature, AIT; this temperature will sensibly reduce by increasing the ambient oxygen partial pressure. At normal air pressure/temperature, the majority of solid material are, of course, not self-igniting. Eventually, EASA will re-phrase the sentence under question.