

**Comment Response Document (CRD)
to Notice of Proposed Amendment (NPA) 12/2005**

**for amending the Executive Director Decision No. 2003/10/RM
on
Certification Specifications, including Airworthiness Codes and Acceptable Means of
Compliance, for European Technical Standard Orders (CS-ETSO)**

**Miscellaneous ETSO.
Revision of ETSO-2C112().**

Explanatory Note

I. General

1. The purpose of the Notice of Proposed Amendment (NPA), dated 20-09-2005 was to propose an amendment to Decision N° 2003/10/RM of the Executive Director of the Agency of 24 October 2003 on Certification Specifications, including Airworthiness Codes and Acceptable Means of Compliance, for European Technical Standard Orders (CS-ETSO) to propose revision of ETSO-2C112().

II. Consultation

2. The draft Executive Director Decision amending Decision N° 2003/10/RM was published on the web site (www.easa.eu.int) on 20-09-2005.

By the closing date of 01-11-2005, the Agency had received 3 comments from 3 national authorities, professional organisations or private companies.

III. Publication of the CRD

3. All comments received have been acknowledged and incorporated into a Comment Response Document (CRD). This CRD contains a list of all persons and/or organisations that have provided comments and the answers of the Agency.
4. In responding to comments, a standard terminology has been applied to attest EASA's acceptance of the comment. This terminology is as follows:
 - **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
 - **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
 - **Noted** – The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
 - **Not Accepted** - The comment is not shared by the Agency
5. The Agency's Decision will be issued at least two months after the publication of this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided.
6. Such reactions should be received by EASA not later than **22-02-2005** and should be sent by the following link: CRD@easa.eu.int;

Para	Commentor	Comment/Justification	Response	Resulting text
Part V, para 8	CAA-UK	<p>Comment:</p> <p>It is interesting that according to paragraph 8 harmonization is an important aspect and yet this ETSO is a 2C ETSO which by definition is an index 2 ETSO (not technically similar or deviates from a FAA TSO).</p>	<p>Noted.</p> <p>Harmonization with future changes to TSO-C112(x) by the FAA will be pursued in the rulemaking task ETSO.002</p> <p>Harmonization is not achieved in this revision, and the b-revision of this ETSO therefore remains in index 2 of CS-ETSO</p>	<p>No text change.</p>
Part V, para 8	LFV, Sweden	<p>If the harmonisation is good, I think that the ETSO should be in the series without “2”, that is ETSO-C112b. Otherwise I think that the harmonisation is not as good as it should be.</p>		
General	FAA	<p><u>Comment:</u> The FAA is currently in the process of drafting a revision to TSO-C112 to arrive at a harmonized TSO/ETSO. This revision will assure consistency in international specifications, which will achieve a common international standard. Consequently, the FAA’s intentions are to request RTCA to form a new committee to revise the mops (RTCA DO-181C) to the latest amendment of ICAO Annex 10, and to harmonize with EUROCAE 49 activity and their revision of ED73. This new standard would then be invoked in the revised TSO-C112 (x). Our global harmonization efforts will ensure equipment compatibility within the global air traffic management architecture and should improve the safety of airspace operations. Our concern is with Change 1 to the MOPS.</p> <p><u>Justification:</u></p> <p>It is unclear the direction the committee will take with regard to Change 1, which provides performance and testing specifications for a “Hijack” feature given that the FAA at this time appears they will not be moving towards rulemaking. It is uncertain whether we will incorporate Change 1 or leave it out. We will discuss this at the EUROCAE WG 49 meeting in December.</p>		