

## Consolidated Document Comment Log (Table) – Internal Coordination Comments, Dispositioned

Proposed Change to **AC 27-1 MG 18**; Title: HELICOPTER TERRAIN AWARENESS AND WARNING SYSTEM (HTAWS).

Organization/ Commenter	Page & Para. No.	Comment & Reason for Comment	Recommendation / Suggested Change	Disposition / Comment Resolution
AIR-500, A. Garrett	Global Change	Incorrect format.	Is this a “Change” not a “Revision”? Make sure you include a “Page Change Control Chart” in the document to indicate where the changes took place.	Partly adopted; annotated to reflect a “change.” The need for a “Page Change Control Chart” will be provided with the pending multiple section changes to AC 27-1B.
AIR-500, A. Garrett	Pg MG 18-1, para a.(2), 3 <sup>rd</sup> sentence	Improper usage of underline.	Remove the underline from the title “Helicopter Terrain Awareness and Warning System (HTAWS)”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-1, Note Section	Improper capitalization.	Remove the capitalization from the term “technical standard order authorization”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-1, para a.(3)	Incorrect formatting for citing reference and using section symbol (§). Non-compliance to the Federal Register Document Drafting Handbook.	Do not use the section (§) symbol or the word “section” when the reference follows “XX CFR”. Only use the section symbol (§) when referring to different paragraphs/subparagraphs within the same section. For example: Correct way to cite: 14 CFR 135.605 Incorrect: 14 CFR § 135.605 Remove the section (§) symbol found before 135.605.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-1 & 18-2, para b.	Incorrect format. Label the first paragraph as b(1) and the second one as b(2).	Rewrite to read: b. Purpose. (1) This guidance sets forth a... (2) AC 27-1 provides general guidance for certification and...	Adopted; change made.
ACE-ATL- ACO-119 <sup>a</sup> R. Chupka	Pg MG 18-1, para b.	Change the term “credit validation” to “System Performance Validation” to match the heading on page 18-7, section g.(5).	Change the term “credit validation” to “System Performance Validation” to match the heading on page 18-7, section g(5).	Adopted; change made.

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AIR-500, A. Garrett	Pg MG 18-2 & 3, para c.(1)	Clarity.	Are these tables or should they be removed and labeled differently? If you choose to keep the tables, then label them properly.	Not adopted; the sub-paragraph headings are sufficient to identify the table contents.
AIR-500, A. Garrett	Pg MG 18-3, para c.(2), 5 <sup>th</sup> line on chart	Missing period. Inconsistent with the rest of the document.	Place a period after the term “Environment”.	Adopted; change made.
ACE-114 Les Lyne	Pg MG 18-3, para c.(2) “ACs, Orders, and TSOs”	Title for document AC 21-16 has a quotation mark at end. It reads: <b>RTCA Document DO-160 versions D, E, and F, Environmental Conditions and Test Procedures for Airborne Equipment”</b> .	Remove quotation mark, so that it reads: <b>RTCA Document DO-160 versions D, E, and F, Environmental Conditions and Test Procedures for Airborne Equipment.</b>	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-3, para c.(2), 6 <sup>th</sup> line on chart	Delete the apostrophe found after the term “Equipment”.	Replace with a period.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-3, para c.(3)(i)	Delete the semicolon found after the zip code”20036-4001”.	Replace with a period.	Adopted; change made.
ANM-130L N. Phan-Tran	Pg MG 18-2 & 3, para (3)	§§ 135.605 & 607 are referenced but these rules have not being published.	AC revision should not be published prior to rules become effective.	Noted; once approved, this guidance is planned to be published subsequent to the publication of these final rules.
ANM-130L N. Phan-Tran	Pg MG 18-3	This Miscellaneous Guidance (MG) 6 references MG 18, and TSO C-194 for Helicopter TAWS (HTAWS).	MG 18 is still referring TSO C-151B for TAWS. Suggest updating MG 18 to reference TSO C-194 for consistency.	Noted; however, TSO-C194 is the current reference in this guidance.
John Hill ANM-130S	Pg MG 18-3, AC 21-16	Include DO-160 Revision “G.”	Latest AC 21-16G calls out DO-160 versions D, E, F, and “G.”	Adopted; change made.
John Hill ANM-130S	Pg MG 18-3, para (2) ACs	Add reference AC 20-174	New AC as of 9/30/11 for ARP 4754	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-4, para c.(3), 6 <sup>th</sup> line on chart	Missing period. Inconsistent with the rest of the document.	Place a period after the term “Equipment”.	Adopted; change made.

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ACE-ATL- ACO-119 <sup>a</sup> R. Chupka	Pg MG18-4, para c.(3)(ii)	Change ARP 4754 to ARP 4754A to call out latest revision	Change ARP 4754 to ARP 4754A to call out latest revision	Adopted; change made.
ANM-100D DACO – Carlson	Pg MG 18-4, para (3)(ii)	SAE ARP 4754 is the old revision	Should be SAE ARP 4754A.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-4, para d.(9)	Improper capitalization.	Remove the capitalization from the title “functional hazard assessment”.	Adopted; change made.
ANM-130L N. Phan-Tran	Pg MG 18-5, para (iii) (A)	AC 135.14A has not been published.		Noted; AC 135-14A was published 6/20/91 however, it is not referenced in this guidance.
AIR-500, A. Garrett	Pg MG 18-5, para e.	Incorrect format. Label the first paragraph as e(1) and the second one as e(2).	Rewrite to read: e. System Description. (1) The HTAWS will assist... (2) Flight evaluations of systems have revealed that reduced...	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-5, para e., 2 <sup>nd</sup> Unidentified Paragraph	Change wording.	Rewrite to read: Operations into off- airfield and unimproved landing zones usually trigger nuisance...	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-5, para f.	Incorrect formatting.	Move paragraph f to the next page with related information.	Noted; proper pagination will be accomplished when finalized.
AIR-500, A. Garrett	Pg MG 18-6, para f.(1), 1 <sup>st</sup> sentence	Improper capitalization.	Remove the capitalization the following terms: “type certification, amended type certification, and supplemental type certification”.	Adopted; changes made.
AFS-360 Mona Tindall	Pg MG 18-6, para f.(1)	Last sentence is confusing.	Change the words “later and earlier” regulations.	Adopted; sentence was rewritten for clarification.
AIR-500, A. Garrett	Pg MG 18-6, para g.	Delete the semicolon after the term “installation”.	Replace with a period.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-6, para g.(1), 1 <sup>st</sup> sentence	Add wording.	Rewrite to read: For first time approvals, the applicant should provide a detailed systems description...	Adopted; change made.

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AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 1 <sup>st</sup> sentence	The term “functional hazard assessment” has already been defined.	Use the acronym “FHA”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 1 <sup>st</sup> sentence	Improper capitalization.	Remove the capitalization the term “system safety assessment”.	Adopted; change made.

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ANM-100D DACO – Carlson	Pg MG 18-6 para g.(2)	<p>“A failure that would lead to the loss of all HTAWS functions, when installed on rotorcraft that operates under rules that do not require HTAWS, is assigned failure condition classification of minor.”</p> <p>This statement contradicts the Failure Condition defined in the MOPS and TSO for HTAWS (RTCA DO-309 and TSO-C194). If a system is being defined to be HTAWS during airworthiness certification it implies that it will meet the performance standards defined by the MOPS and TSO. A failure condition of minor even if it is not required for operations does not meet this standard.</p> <p>The design assurance (section 2.1.6) defined in RTCA DO-309 states that, “The hardware and software shall be designed so that misleading information and unannounced loss of function shall be improbable. Both conditions are considered to be major failure conditions and shall not be more probable than 10-5 per flight hour.”</p> <p>The Failure Condition defined in TSO-C194 section 3b states, “Failure of the function defined in paragraph 3a of this TSO is a major failure condition.”</p>	<p>Defining design architecture (hardware or software) during airworthiness certification that is different if operated under Part 91 or 135 is difficult. An applicant could state that this going to be operated under Part 91 and HTAWS is not required for operations and only meet a minor classification, but without limitations well defined FSDO may grant operational approval under Part 135 without knowing that the system will not meet the performance requirements. FSDO will assume that since it is HTAWS it should meet the requirements for Part 135.</p> <p>Suggestion is that the failure condition should not change depending on the operations.</p>	Adopted; hazard classifications for different operational requirements were removed.

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ANM-100D DACO – Carlson	Pg MG 18-6, para (g)(2)	<p>“Failure of the HTAWS to provide appropriate terrain and obstacle aural and visual alerts, on rotorcraft that operate under rules that do require HTAWS, is assigned a failure condition classification of major by TSO-C194. Therefore, the HTAWS installation must meet the following criteria:</p> <p style="padding-left: 40px;">(i) The probability of a failure that would lead to the loss of all HTAWS functions that are described in paragraph e. (System Description) of this guidance, must be less than or equal to 10-3 per flight hour.”</p> <p>10-3 per flight hour would fit a minor failure condition, but not a major failure condition.</p> <p>“ (ii) The probability of a false caution and/or warning alert due to undetected or latent failure must be less than or equal to 10-4 per flight hour.”</p> <p>This does not meet the major failure condition.</p>	<p>Recommended change:</p> <p>Failure of the HTAWS to provide appropriate terrain and obstacle aural and visual alerts is assigned a failure condition classification of major by TSO-C194. Therefore, the HTAWS installation must meet the following criteria:</p> <p>(i) The probability of a failure that would lead to misleading or the loss of all HTAWS functions, must be less than or equal to 10-5 per flight hour.”</p> <p>(ii) The probability of a false caution and/or warning alert due to undetected or latent failure must be less than or equal to 10-5 per flight hour.”</p>	Adopted; hazard classifications for different operational requirements were removed.

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AFS-360 Mona Tindall	Pg MG 18-7, para g.(2)	Second from last sentence is unclear.	May want to begin with “Rotorcraft that operate under regulations that require...See para. (3) on pg MG 18-7.	Adopted; hazard classifications for different operational requirements were removed.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 4 <sup>th</sup> sentence	Add wording.	Rewrite to read: ...is assigned the failure condition classification.	Noted; however hazard classifications for different operational requirements were removed
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 5 <sup>th</sup> sentence	Add wording.	Rewrite to read: ...that do require HTAWS, is assigned failure condition classification of major by the TSO-C194.	Noted; however hazard classifications for different operational requirements were removed
AIR-500, A. Garrett	Pg MG 18-6, para g.(2)(i)	Unnecessary wording.	Delete the term/title “System Description” found parenthesis.	Adopted; change made.
ACE-117C (mep)	Pg MG 18-6 & 7, para g.(2)	This paragraph identifies 2 assigned failure conditions: helicopters not requiring HTAWS (minor) and helicopters requiring HTAWS (major). Subsequent paragraphs (i), (ii), (iii) and (iv) assign numeric probability of failures. It is not clear that these numeric probability of failures are applicable for the minor and/or major failure classifications.	Either 1) remove probability of failures, 2) assign appropriate probabilities to the different failure conditions or 3) explain how the same numerical probability of failure applies to both a minor and major failure classification.	Adopted; hazard classifications for different operational requirements were removed..

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ANM-100D DACO – Carlson	18-7 (g)(2)	<p>“(iii) The probability of an unannounced failure of the system to provide the required alerting functions due to undetected or latent failures must be less than or equal to 10-4 per flight hour.</p> <p>(iv) The probability of the system to provide HMI to the HTAWS display due to undetected or latent failures must be less than or equal to 10-4 per flight hour.”</p> <p>These do not equal a major failure condition.</p>	<p>Recommended change:</p> <p>“(iii) The probability of an unannounced failure of the system to provide the required alerting functions due to undetected or latent failures must be less than or equal to 10-5 per flight hour.</p> <p>(iv) The probability of the system to provide HMI to the HTAWS display due to undetected or latent failures must be less than or equal to 10-5 per flight hour.”</p>	Adopted; hazard classifications for different operational requirements were removed.
ACE-ATL- ACO-119 <sup>a</sup> R. Chupka	Pg MG 18-7, para g.(3)	Change heading from “Software Qualification” to “Software and Airborne Electronic Hardware (AEH) Qualification” and the paragraph should be changed to add requirements for DO-254	Change heading from “Software Qualification” to “Software and Airborne Electronic Hardware (AEH) Qualification” and the paragraph should be changed to add requirements for DO-254	Adopted; change made.

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ANM-100D DACO – Carlson	18-7 (g)(3)	<p>“When installed on rotorcraft that operate under rules that do not require HTAWS, this same failure is assigned a failure condition of minor. The software design assurance level should be commensurate with the assigned failure condition classification.”</p> <p>This does not follow the MOPS or TSO-C194 requirements of a major failure condition.</p>	Remove this paragraph.	Adopted; hazard classifications for different operational requirements were removed.
AIR-40 Hal Jensen	Pg MG 18-7, para g.(3), Software Qualification	<p>Applicants from the EU who have EASA as their technical agent and apply for FAA TSO LODA may use EUROCAE/ ED-12 in lieu of RTCA/DO-178.</p> <p>The FAA-EASA TIP Appendix B recognizes EUROCAE/ ED-12, <i>Software Considerations in Airborne Systems and Equipment Certification</i> as an equivalent to RTCA/DO-178, <i>Software Considerations in Airborne Systems and Equipment Certification</i>.</p>	Add sentence to paragraph “(3)” to indicate: Applicants from the EU applying for FAA LODA through EASA may use EUROCAE/ ED-12, <i>Software Considerations in Airborne Systems and Equipment Certification</i> in lieu of DO-178.	Adopted; change made.

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ACE-114 Ruth Hirt	Pg MG 18-7, para g.(3), Software Qualification	The last sentence of this paragraph states that, “Coupled with this are the evasive maneuvers that will be employed to avoid terrain and obstacle.” right after the discussion of failure condition and software design assurance level. It seems to imply that some sorts of credits are being taken from the evasive maneuvers”.	Clarify the intent of stating the use of “evasive maneuver...to avoid terrain and obstacle”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-7, para g.(3), Last sentence	Change wording.	Rewrite to read: Coupled with this are the evasive maneuvers that will be employed to avoid terrain and obstacles.	Noted; however, this sentence is deleted.
AIR-40 Hal Jensen	Pg MG 18-7, para g.(4), Environmental Qualification	Applicants from the EU who have EASA as their technical agent and apply for FAA TSO LODA may use EUROCAE/ ED-80 in lieu of RTCA/DO-254.  The FAA-EASA TIP Appendix B recognizes EUROCAE/ ED-80, <i>Design Assurance Guidance for Airborne Electronic Hardware</i> as an equivalent to RTCA/DO-254, <i>Design Assurance Guidance for Airborne Electronic Hardware</i> .	Add sentence to paragraph “(4)” to indicate: Applicants from the EU applying for FAA LODA through EASA may use EUROCAE/ ED-80, <i>Design Assurance Guidance for Airborne Electronic Hardware in lieu of DO-254</i> .	Adopted; however, this sentence was added to the immediately preceding paragraph (3).

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ACE-114 Ruth Hirt	Pg MG 18-7, para g.(5), System Performance Validation	The first sentence of this paragraph states that "...the performance of the HTAWS, with regards to the position of the aircraft relative to the terrain or obstacle, is adequate to prevent hazardously misleading information."  Is the hazardously misleading information not based upon and/or resulted from the position of the aircraft relative to the terrain or obstacle? What is expected to be demonstrated so that "performance of HTAWS... is adequate to prevent hazardously misleading information"?	Clarification.	Adopted; added reference to DO-309 for complete performance evaluation.
AIR-500, A. Garrett	Pg MG 18-8, para h.	Missing underline and delete semicolon. Inconsistent with the rest of the document.	Underline the title "Installation Considerations".	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-9, para i. & j.	Missing underline from title.	Underline the paragraph titles "Ground Test Considerations" and "Flight Test Considerations".	Adopted; change made.
ACE-114 Ruth Hirt	Pg MG 18-9, para i.(1)(E)	Acronyms, NVIS and NVG, are used without spelling out first.	Editorial	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-9, para i.(1)(E)	Define the term for the acronyms "NVG" and "NVIS STC" first.	Use the acronyms "NVG" and "NVIS STC" after the first usage.	Adopted; change made however, STC was previously defined.
AIR-500, A. Garrett	Pg MG 18-10, para j.(2)	Improper capitalization.	Remove the capitalization from the term/title "terrain and obstacle display".	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-10, para j.(4), Bullet Section	Refrain from using bullets. Bullets can be difficult to reference.	Replace bullets with a letter for referencing purposes.	Noted; however, due to the brevity of the listing and to conserve space the use of bullets is appropriate in this case.

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AIR-500, A. Garrett	Pg MG 18-11, para k.	Missing underline from title.	Underline the paragraph title “Rotorcraft Flight Manual (RFM) or Rotorcraft Flight Manual Supplement (RFMS)”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k., Note Section	Improper capitalization.	Remove the capitalization from the term/title “terrain and obstacle display”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(1)(ii)	Improper capitalization.	Remove the capitalization from the term/title “power lines in the obstacle database”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(1)(iii)	Improper capitalization.	Remove the capitalization from the terms “protection mode” and “approach procedures or other special procedures”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(i)	Improper capitalization.	Remove the capitalization from the term “caution alert”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(ii)	Improper capitalization.	Remove the capitalization from the term “warning alert”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(iii)	The term “Flight Manual (or Supplement) has already been defined.	Use the acronym “RFM (or RFMS)”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(iii), Bullet Section	Refrain from using bullets. Bullets can be difficult to reference.	Replace bullets with a number.	Noted; however, due to the brevity of the listing and to conserve space the use of bullets is appropriate in this case.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(iii), Bullet#2	Delete the question mark found after the term “inhibited”.	Replace with a period.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-12, para 1., 1 <sup>st</sup> sentence	The term “instructions for continued airworthiness” has already been defined.	Use the acronym “ICAs”.	Adopted; change made.

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ANM-130L N. Phan-Tran	Pg MG 18-16, para (13)	Flight Data Monitoring System as required by §135.605. This system has a similar requirement of recording parameters and sampling rates as the Flight Data Recorder (FDR) system required in §29.1459.	If these 2 systems would be considered as separate systems, please add a statement to clarify it.	No action taken; this comment appears to be toward the AC 27 MG 6, which was duplicated on the comment log for that AC change.
ANM-130L N. Phan-Tran	Pg MG 18-16, para (13)(i)	The Flight Data Monitoring System requires to be tested per DO-160F or later revision.	If this system will be required under operational §135.605 and not required for part 29, DER will not be able to assist FAA in approving DO-160 test results for compliance.	No action taken; this comment appears to be toward the AC 27 MG 6, which was duplicated on the comment log for that AC change.