

**Disposition of Public Comments on Draft AC 20-24D, Approval of Propulsion Fuels and Lubricating Oils**

	<b>Commenter</b>	<b>Page &amp; Para</b>	<b>Comment:</b>	<b>Disposition</b>
1	Boeing Commercial Airplanes	Pg 6, Para 7.e	... it appears that applicants can provide a fuel specification that they themselves have defined and request the FAA to grant them an STC for use of that fuel. We do not support this proposed change as we consider it has the potential to add risk to the use of the fuel in the airplane and in the fuel handling equipment.	Non-concur. FAA regulatory procedures prohibit the FAA from proscribing specific means of compliance to specific requirements. We are required to accommodate alternative means of compliance to specific regulations if proposed by industry.
2	Brazilian ANAC, Adalton R. Martuscelli	Pg 10, Para 8.c.(2)(c)3	The AC does not specify the minimum expected cetane number of Jet A fuel. Compression Ignition (CI) reciprocating engines require fuel with an acceptable cetane number to ensure stable combustion across the entire operating envelope, but the ASTM specification for Jet A fuel, D1655, does not specify a minimum cetane number.	Response to comment. The FAA does not have the capability or resources to determine the minimum expected cetane number in jet fuel. ASTM is currently investigating this issue. Until the ASTM investigation is complete, the TC/STC applicant will need to provide an analysis to the FAA that substantiates the cetane number of the jet fuel used for certification testing. As stated in the comment, cetane is an uncontrolled input condition. This policy was devised to accommodate the certification of diesel aviation engines.
3	SAE E-34 Committee	7i(2)(a) on page 6	The example given under 7i(2)(a) on page 6 is a bit mixed up!! “Aeroshell Oil W 15W-50 meeting SAE International Standard (AS5780)”	Adopted. Changed to “...meeting SAE International Standard J1899”.
4	SAE E-34 Committee	9.b.(3)(b)(1)	As there is a (small) risk associated with many of the QPG decisions I would suggest to include the word “significant” in 3.2.b.1: Changes that have a significant potential to adversely impact the engine oil system will result in brand re-identification which will require review by the regulatory authorities.	Adopted. Changed to “SAE requires brand re-identification if these changes have a significant potential to adversely impact the engine oil system.”

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			Such a significant change would likely also cause the QPG to need more than the allotted 40 days to come to a decision. The QPG is probably the best body to debate and determine what the differences are between a change, a significant change, and a change that - in effect- constitutes of the approval of a new product.	