

	AVS Quality Management System	QPM # AIR-001-007-F1	Revision 0
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REVISION HISTORY		
Rev	Description of Change	Effective Date
0	Original	6/19/09

	AVS Quality Management System	QPM # AIR-001-007-F1	Revision 0
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1. Document No.: AC 20-24D, Approval of Propulsion Fuels and Lubricating Oils	2. Project Manager: Mark Rumizen	3. Reviewing Office: Brad Wall Rolls-Royce (317)230-8656	4. Date of Review: October 5, 2013	5. Date of Disposition:
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Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by project manager prior to sending out for comments.
Blocks 3 & 4: To be completed by reviewing office. Enter office symbol, reviewers name and phone number.
Block 5: To be completed by project manager after receiving comments from reviewing office. Enter date of disposition.
 The below columns are to be completed by the reviewing office, except for the "Disposition" column.
 Project manager's disposition in comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as:

- Adopted;
- Partially Adopted;
- Non-Concur;
- Concur but Outside of Scope (Will be considered in next change/revision); or
- Answer to Question or Statement.

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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	4 / 6.b	This definition refers to “performance” criteria for fuels and oils. Need better definition.	The performance criterion in this section does not define all of the requirements an OEM would require, only compliance with known quality control and chemical/physical properties.	Add additional language to communicate “performance requirements” in this definition refers to known quality control and chemical/physical properties. In addition, make a reference that OEM’s define the remainder of the performance requirements to assure the fluid is fit for purpose in the engine/AC.	Agree. Text changed to state “performance requirements and other characteristics”.
2.	5 / 7.b	This section describes fluid grades, specifications and designation for fluids. Further clarity for turbine lubricants is needed.	Turbine lubricants are commonly approved by brand name and specification by OEM’s, and listed as such in engine documentation.	Add: A specification in conjunction with brand name is often used to designate approved turbine lubricants.	Agree. “Brand name” added to text.

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Check The Master List To Verify That This Is The Correct Revision Before Use /s/ NMB 6/19/09

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3.	5 / 7.d	Key point missing in this section is OEM approval required to add new fuels and oils to a TC.	Any new fuel or oil added to a TC requires proper regulatory showing AND OEM approval.	Insert: "... proper regulatory showing, including OEM approval , the identified..."	Disagree. FAA regulations permit non-OEM approval of design changes to TC'd products via the STC process. Therefore, it would be incorrect to incorporate the recommended change. Also, regarding TCs/ATCs, it is implicit in the application that the OEM approves the change.
4.	6 / 7.e	The use of independent specifications and STC's are a primary concern for Rolls-Royce. OEMs must be part of this evaluation and approval process.	Without OEM input during approval or use of independent specifications, new fluids could be added to STC's and accepted by the FAA only. This may raise questions on suitability of the fluid, and could potentially compromise our products performance, reliability and safety. If a major event occurs, concerns around liability would exist.	Rolls-Royce recommends relevant OEM involvement in this process, along with the FAA. All sections related to this process should incorporate engine/AC OEM involvement.	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.

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5.	6 / 7.h	We have concerns that this section allows an applicant/producer to work with the FAA to define qualification protocol (i.e. engine tests).	It appears that OEMs are not part of defining this protocol.	OEMs in cooperation with the FAA should define engine/AC specific protocol.	Disagree. FAA regulations permit non-OEM approval of design changes to TC'd products via the STC process. The FAA cannot require that the applicant work in cooperation with the OEM.
6.	6 / 7.i.1	While we understand this AC is not regulatory in nature, it appears that listing approved fuels in TC and engine documentation is a guideline, not a requirement.	The use of the word "should" indicates optional. More emphasis on using this format to describe approved fuel listings is desired.	Use, "Approved fuels are described in operating limitations..."	Agree. Recommended change incorporated into document.
7.	6 / 7.i.2	While we understand this AC is not regulatory in nature, it appears that listing approved oils in TC and engine documentation is a guideline, not a requirement.	The use of the word "should" indicates optional. More emphasis on using this format to describe approved oil listings is desired.	Use, "Approved oils are described in operating limitations..."	Agree. Recommended change incorporated into document.

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8.	11 / 8.f	Section covers certification compliance plans for new fuels. Does not mention OEM involvement.	OEM involvement/approval is required to address engine/AC performance, safety and reliability requirements.	Add: Applicants, with engine/AC OEM review and approval, must demonstrate that the engine and the AC continue to meet all certification standards when operating with the new fuel.	Disagree. FAA regulations permit non-OEM approval of design changes to TC'd products via the STC process. The FAA cannot require that the applicant seek OEM review and approval. "Continue to meet all cert stds" is covered in para. 7.a.
9.	16 / 9.b.1	Operating limitations for oils in this section refer to oil grade or specification, but does not make reference to brand name of oil.	Rolls-Royce believes brand name of oil is a critical operating limitation for lubricating oils, which is discussed further down in paragraph 9.b.3.a.	Add "brand name" as a suitable operating limitation to this section.	Agree. Recommended change incorporated into document.
10.	17 / 9.c.4	Section covers oil certification compliance plans include applicant demonstrating in engine/AC that new oil operating limitation is fit for purpose. The section may infer without OEM involvement.	OEM involvement/approval is required to address engine/AC performance, safety and reliability requirements when using a new oil.	Add: ".. must demonstrate, along with engine/AC OEM review and approval , the engine..."	Disagree. FAA regulations permit non-OEM approval of design changes to TC'd products via the STC process. The FAA cannot require that the applicant seek OEM review and approval.

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