

**AC 25.1302 Installed Systems and Equipment for Use by the Flightcrew
All Interdirectorate Comments 1-5-2011**

Page and Para#	Commenter & comment #	Comment	Requested Change	Disposition
Overall Document	Clark Davenport, ASW-112	<p>This is an ambitious document that covers a complex and involved subject including numerous 14 CFR Part 25 sections as a matter of course. It contains excellent material, like the 25.1302 preamble and explanatory material. For the most part, we have few comments on technical content. Unfortunately, the organization of the draft that we commented on is confusing, cumbersome, and frustratingly difficult to read. Serious consideration needs to be given to reorganizing the document and leaning it out. As an example, the inclusion of the 25.1302 preamble and explanatory material is excellent as background material. It is currently located in the middle of “how to certify an aircraft” part of the AC. It needs to be in “Background” or some paragraph at the front of the AC. Additionally, there are numerous superfluous paragraphs that do not provide information relevant to showing a means of compliance. Overall, the AC does not appear to be well organized. Additionally there are numerous editorial and other issues that should be addressed.</p>	<p>Reorganize the AC: Place all background, explanatory, “how to use this AC”, and other material that does not provide direct support for developing a means of compliance in one part of the AC. Make a clear demarcation of the “what and why” part, the “how to use this AC part, and the “means of compliance” part. Analyze the overlap and redundancy between AC 25.1302 and other AC material for the regulation sections cited in the AC. If AC 25.1302 repeats what is in another AC, then suggest finding a way to reduce redundancy (if it is significant). attachment.</p>	<p>EASA AMC 25.1302 was written in accordance with the Joint European and American Human Factors-Harmonization Working Group report of June 15, 2004. It was published by the European Aviation Safety Agency in CS-25 as Amendment 3 on September 19, 2007. In harmonizing Advisory Circular 25.1302 with AMC 25.1302, we endeavored to retain a similar format and presentation of material so both documents could be easily cross-referenced. We tried to keep as much of the FAA Advisory Circular formatting and style as possible in AC 25.1302 while still enabling users to find similar references in the AMC document. Because the EASA AMC numbering and formatting is different from AC formatting, the AC numbering was modified to match the same paragraphs in AMC 25.1302, where possible.</p>

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		For example, the AC starts with the standard motherhood paragraphs (the “what and why of the AC...WW), segues into what appears to be developing means of compliance (MOC) and then reverts back to the WW, mixes in some “how to use this AC”, bounces back to teasers about means of compliance, while referring the reader forward to other paragraphs or back to previous paragraphs.		We will evaluate the organization of the AC following public comment and determine whether a reorganization would maintain harmonization.
General	W. Smith, ACE-100	Lots of great information in this document, however, it is not written in a clear and concise manner. Additionally, awkward wording, grammar errors, and spelling mistakes detract from usefulness.	Entire document should undergo extensive tech editing review	Grammar and spelling mistakes are corrected and some sentences are rewritten. We tried to retain AMC 25.1302 organization for cross-referencing information.
General	Brady, ACE-100	This is good information but I’m not sure that it is clear guidance. Most of the information appears to be more appropriate to an update to the Human Factors Design Guide instead of an AC. I do not get a clear sense of what an applicant is to do to show compliance to 25.1302.		No change was suggested. Most of the wording has already been accepted by EASA. The FAA has added additional regulatory information to the AC beyond what is in the AMC that will provide a better sense of compliance requirements.
General	ACE-117C	AC needs to be more concise	Move as much as possible from sections 1-13 into an appendix or remove and keep the meat of the guidance Sections 14-24 in the beginning of the document.	The AC was written to match the format and organization of AMC 25.1302 for cross referencing.

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General	ACE-117C	AC does not address TSO equipment approvals that heavily influence the human factors prior to any TC or STC project.	Need human factors guidance on TSO programs or change our policy on involvement in TSO approvals when an article has a large amount of human factor elements that need to be addressed early in the design phase.	TSO's do not apply to an installation approval. They are only specifications so they are not applicable.
Global Change in Footer	AIR-500	Incorrect format.	Delete the date notation from the footer.	Date notation is only for our draft. The final version will not have a date.
Global Change	AIR-500	Incorrect formatting.	When there is one paragraph in a section, move the text to be begin immediately after the title of the paragraph. For examples refer to paragraphs 1, 3, 5b, 5b(2), 6, 9, 12, 21, and 23.	For automated table of contents, there must be a space between the header and the body of the text. With a limited number of headers we may manually correct this after the final table of contents is generated.
Global Change	AIR-500	Refrain from using bullets.	Use a letter or number instead.	All bullets are now either letters or numbers.
Global Change	AIR-500	Missing space.	There should be two spaces between sentences. For examples refer to paragraphs 8a, 13f(3), 16e(2)(b), 16f(4) (on pages 30 & 31), 17(d) (on page 35), and 19b(3)(b).	Corrected.
Global Change	AIR-500	Improper capitalization.	Remove the capitalization in the term "paragraph" when referencing unless it begins a sentence.	Corrected.
Global Change	AIR-500	The term "flight management system" has already been defined.	Use the acronym "FMS".	Corrected.

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Header Section, Cover Page	AIR-500	Incorrect font.	Adjust the font size of the DOT logo and FAA title in the header. It's too small.	Corrected.
Subject Area, Cover Page	AIR-500	Incorrect spacing.	Remove the extra space between the Subject Area and the solid line. The solid line should be placed directly under the Subject Area.	Corrected.
Signature Block, Cover Page	AIR-500	Incorrect spacing.	There should be only five spaces between the paragraph and signature block.	Corrected.
Page i	R. Joslin, AIR-100		Add the sentence " <i>If the applicant uses the means described in the AC, they must follow it in all important respects</i> "	Not added. This is unstandard text and not in the TAD AC template.
Page i	R. Joslin, AIR-100		Add " <i>shall</i> " to the sentence so that it reads "Mandatory words such as must and <i>shall</i> ..."	Comment on shall is not necessary. TAD does not use the word "shall" in ACs. We added an additional paragraph on page one from legal.
Table of Contents, #s 9, 11, & 13, Page i	AIR-500	Missing capitalization.	Capitalize the following terms in the paragraph titles for consistency: "Flightdeck Certification Program", "Means of Compliance", and Other Requirements".	Corrected.
Header Section, Page 1	AIR-500	Incorrect AC number.	Replace with AC 25.1302-1.	Corrected.
Above Paragraph 1,	AIR-500	Incorrect spacing.	Remove the extra space between the header and	Corrected.

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Page 1			paragraph 1. There should be only two spaces between them.	
Paragraph 1, 1 st sentence, Page 1	AIR-500	Missing section symbol (§).	Rewrite reference to read: Title 14, Code of Federal Regulations (14 CFR) § 25.1302.	CFR format does not insert § for first time use. (Refer to 1 CFR 8.9 for correct citation format.)
Paragraph 2a, Page 1	R. Joslin, AIR-100		Add “ <i>flight test engineers</i> ” to the list of intended users	Added.
Paragraph 3, Page 1	AIR-500	Clarity.	Title does not define the content well. Consider alternate like “paragraph organization and numbering”.	Title rewritten per suggestion.
Paragraph 3, Page 1	Clark Davenport ASW-112	Suggest changing title Sentence makes no sense. What referenced regulations? Additionally, 14 CFR Part 25 is not written to match EASA AMC’s. Suggest deleting sentence RCS-ASW170: Move EASA references to an appendix. If EASA changes anything, then this AC is invalid. If appendix changes, just an appendix update needed.		Title rewritten per suggestion. Table put in appendix.
Paragraph 3, 1 st and 2 nd sentences, Page 1	AIR-500	Missing section symbol (§).	Place a section symbol (§) in front of 25.1302.	EASA uses CS, not §. This refers to EASA CS 25.1302.
Paragraph 3, 2 nd sentence, Page 1	AIR-500	Missing capitalization.	Capitalize the term “order” in the reference of 1320.46C, Appendix 1”.	Corrected.
Page 2, Table 1	ASW170-RCS		Move table to appendix or delete.	Table moved to appendix.

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Table 1, Page 2	AIR-500	Missing bold.	Bold the title “subject”, AC Paragraph”, and “AMC Section”.	Corrected.
Paragraph 4a, Page 3	W. Smith, ACE-116A	This section is one run-on sentence.	Break up sentence into shorter, clearer sentences.	Broken into three sentences.
Paragraph 4a, Page 3	R. Joslin, AIR- 100		For clarity to non-native English users change the phrase “slip of the fingers in typing” to “ <i>an incorrect keystroke</i> ”	Change made.
Paragraph 4a, Page 3	ASW-112		Suggest changing this example. Or delete it. Not sure it is clear. For instance, What kind of difference. Too open for interpretation,	Broken into three sentences.
Paragraph 4b, Page 3	John Piccola, ANM-109	Still, accident analyses have identified flightcrew performance and error as significant factors in a majority of accidents involving transport category airplanes.	Kathy Abbott wants to keep NPRM statement.	Will keep NPRM statement per Kathy Abbott.
Paragraph 4b, Page 3.	ASW-112		Suggest swapping these two paragraphs. The original (b) seems more of an intro to the background. The original (a) builds on the concept of error introduced in (b) and continues into (c)	Retained original organization.
Paragraph 4d, 2 nd sentence, Page 4	AIR-500	Change placement of section symbols (§).	Rewrite to read: ...such as §§ 25.1301(a), 25.771(a), and 25.1523.	Corrected.
Paragraph 5, Page 4	W. Smith, ACE-116A	“interfaces which” , Improper grammar	“interfaces that”	Corrected.

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Paragraph 5, Page 4	ASW-112		Insert all of Chapter 14 here. This is where the preamble material and explanatory material of 1302 should be. The original location was in the middle of how to show compliance v. here in the background/overview section.	Retained original.
Paragraph 5, Page 4	ASW-170		Consider moving to appendix.	Retained original.
Paragraph 5, Page 4	ASW-112		Move old para 8 to here. Makes more sense from information flow. This is part of the “What/Why” in the AC. Specifically, what does this AC cover? Also allows for removal of old table in 5. Both tables contain the same information.	Retained original.
Table 2, Page 4	ASW-112		Suggest changing to “list of Part 25 rules that inter-relate with 25.1302. The existing wording, especially “requirements” is not normally used (at least outside of the TAD)	Changed to “List of Part 25 rules that relate to this AC. “ and first column to Part 25 Rules.
Table 2, Page 4	ASW-112		Move from “Other related documents” This table contains same information as the table in Other related docs.	Retained original.
Paragraph	Cathy Swider,	Notice 8110.98 was cancelled	Delete reference to	Deleted.

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5a(3), Page 5	AIR-120	5/10/2003	cancelled notice.	
Paragraph 5b, Page 5	R. Joslin, AIR- 100		Replace the phrase “ <i>cross-side reach</i> ” with “ <i>cross-cockpit reach</i> ”	Changed to “cross-flightdeck reach.”
Paragraph 5b, Page 5	ASW-112		Move old para 8 to here. Makes more sense from information flow. This is part of the “What/Why” in the AC. Specifically, what does this AC cover? Also allows for removal of old table in 5. Both tables contain the same information.	Retained.
Paragraph 5b, Page 5	ASW-112		Suggest changing to “list of Part 25 rules that interrelate with 25.1302. The existing wording, especially “requirements” is not normally used (at least outside of the TAD)	Retained.
Paragraph 5b, Page 5	AIR-500	Missing capitalization.	Capitalize the term “documents” in the title.	Corrected.
Paragraph 5b(1), Page 5	Dave Rich, AIR-110		Change Society of Automotive Engineers to SAE International	Change made.
Paragraph 5b, 2 nd sentence, Page 5	ASW-112		Suggest deleting this sentence unless expanded. Information only for the applicant or is there other significance to this statement? IOW, do you	Retained.

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			expect the applicant to heed and incorporate those special constraints and limitations into their design in order to show compliance? If so, then make a statement to that effect. If not, then delete this sentence.	
Paragraph 5b(1)(b) & (c), Page 5	AIR-500	Inconsistent formatting.	Include the date of these SAE for consistency with (a).	Dates added.
Paragraph 5b(2), Page 5	AIR-500	Redundant information.	Delete "FAA Report".	Leave as is. If there are other FAA reports it would also go in this section.
Paragraph 5b(3)(a), Page 5	AIR-500	Delete subparagraph (a).	Move the text to be included directly after (3).	Corrected.
Paragraph 5b(3)(b), Page 5	AIR-500	Incorrect placement of subparagraph.	Move (b) ICAO to be (4) (b).	Corrected.
Paragraph 5b(4)(b), Page 5	AIR-500	Clarity.	This is not ICAO. This should be (5).	Corrected.
Paragraph 6a, Page 6	Cathy Swider, AIR-120	Wrong case - AC- Advisory circular	Capitalize Circular	Corrected.
Paragraph 6a, Page 6	Dave Rich, AIR-110		Change Society of Automotive Engineers to SAE International	Corrected.
Paragraph 6a, Page 6	AIR-500	Incorrect formatting.	Adjust the alignment of the acronyms to align directly under the title of subparagraph 6a. Abbreviations and	Corrected.

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			Acronyms.	
Bottom of Page 6	AIR-500	Incorrect formatting.	Remove page break.	Removed.
Paragraph 6b, Page 7	AIR-500	Remove bold in title.	In the labeling of the subparagraph place the letter “b”.	Removed.
Paragraph 6b, Page 7	AIR-500	Missing numbering and adjust alignment.	Number the definitions for reference purposes.	Numbered.
Paragraph 6b, Page 7	AIR-500	Definition “display”, missing comma.	Place a comma after the term “visual” in the definition of the word “display”.	Comma added.
Paragraph 7b, 2 nd sentence, Page 8	ASW-112		Delete the definition of complexity because it is defined in paragraph 9.	Deleted.
Paragraph 7b, Page 8	ASW-112		Make definition of interface specific: Flightcrew-aircraft system interface and interaction can be one of the contributors to error. Design can mitigate this. Suggest adding these definitions.	Will consider comment but definition of interface is retained.
Paragraph 7b, Page 8	ASW-112		Paragraph 9 has this term, integration, in it as “new” concepts. The definitions should be here.	Deleted. Definition of integration is retained in paragraph 9.
Paragraph 7b, 2 nd sentence, Page 8	AIR-500	Missing acronym.	Place the acronym “TC” after the term “type certificate”.	Added.
Paragraph	W. Smith,	Last sentence is very confusing and	Reword to clearly state	Rewritten.

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7c, Page 8	ACE-116A	unclear. Not sure what a “maintenance flightcrew” is.	those actions performed on the ground that do not involve operation of the aircraft, such as mx, are not applicable. Use “maintenance personnel” in place of “maintenance flightcrew”	
Paragraph 7c, Page 8	R. Joslin, AIR-100		Add the sentence “ <i>This AC applies to both mandatory and optional systems or equipment</i> ”	Disagree – applies to all installed equipment (mandatory and optional).
Paragraph 7d, Page 8	R. Joslin, AIR-100		Delete the words “ <i>and checked out</i> ” for consistency with paragraph 5(b) which states that the AC “does not apply to training, qualifications, or licensing requirements for flightcrews	Changed to just “checked” and not “checked out.” “Checked” is the correct term.
Paragraph 7e, last sentence, Page 8	AIR-500	Incorrect spacing.	Remove space from between the 25.1302 and (d) in the reference.	Removed.
Paragraph 7e(1) thru (4), Page 8	AIR-500	Missing capitalize.	Capitalize the terms “Skill-related and errors” at the beginning of each sentence.	Capitalized.
Paragraph 7e(4), Table 3,1 st box under relevant material in this AC	AIR-500	Incorrect spacing.	Remove extra space from in front of reference to paragraph 18.	Corrected.

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section, Page 8				
Paragraph 7e, Table 3, Page 9	AIR-500	The term “advisory circular” has already been defined.	Use the acronym “AC”.	Corrected.
Paragraph 7e, Table 3, Page 9	AIR-500	Suggestion.	Use bullets in columns 2 and 3 in order to delineate different lines.	All bullets converted to letters and numbers per AIR-500.
Paragraph 7e(4), Table 3, 4 th box under General Topic section, Page 8	AIR-500	Incorrect format.	Remove the period after the term “conditions” under § 25.1309(c) in the general topic section.	Corrected. Period removed.
Paragraph 7e, Table 3 Page 8	ASW-112		Suggest changing to “list of Part 25 rules that interrelate with 25.1302. The existing wording, especially “requirements” is not normally used (at least outside of the TAD)	Retained.
Paragraph 7e, Table 3 Page 8	ASW-112		Move from “Other related documents” This table contains same information as the table in Other related docs.	Retained.
Paragraph 7e(4), Table 3, 4 th box under relevant material in	AIR-500	Missing capitalization.	Capitalize the term “Information”.	Corrected.

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this AC section, Page 8				
Paragraph 7f, last sentence, Page 10	AIR-500	Improper usage of comma.	Remove the comma after the term “material”.	Comma removed.
Paragraph 7f, 1 st sentence, Page 8	ASW-112		“guidance” regarding what? Showing compliance to other mentioned requirements?	Added the word “with.”
Paragraph 7f, page 10	ASW-112		Suggest moving this paragraph up to just below the suggested placement of the preamble/explanatory paragraph	Retained – kept.
Paragraph 8a, 2 nd sentence, Page 10.	ASW-112	How is the process in this AC different then the process used for other Act’s?	Suggest incorporating at least paragraphs 9, 10, 11 into this paragraph. They discuss applicant activities and processes to for showing compliance as stated in this paragraph..	Retained.
Paragraph 8a(2), Page 10	ASW-112	Does the guidance in para’s (1), (2) conflict with sequencing process or are we not sequencing any more?		Not within the scope of the AC. The sequencing process is not yet formulated.
Paragraph 8a(3), Page 10	ASW-112	Could this paragraph lead an applicant to believe that they can get certification credit for the design (as a whole) if they and the FAA agree that one HF issue is shown to be compliant?		Paragraph rewritten.
Paragraph 8a(3), Page 10	Cathy Swider, AIR-110	Add phrase for clarification at end of final sentence	...”certification credit,” and the TIA will include a reference to the human factors evaluation.	Disagree. Different process.

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Paragraph 8a, 1 st sentence, Page 10	AIR-500	The term “aircraft certification office” has already been defined on page 6.	Use the acronym “ACO”.	Corrected.
Paragraph 8a(4), Page 10	W. Smith, ACE-116A	Second line has, “AC which”	“AC that”	Corrected.
Paragraph 8(4) Page 10	ASW-112	This information is already set out in Paragraph 3. If more detail is needed, then suggest adding it to paragraph 3. Let the flowchart speak for itself. Additionally explaining paragraph content seems to be redundant here and out of place		Retained.
Paragraph 8, Figure 1 (3) lower input Page 11	Cathy Swider, AIR-120	Wrong case - Criteria: applicability Of...	Use lower case – Criteria: applicability of...	Corrected.
Paragraph 8a(4), Figure 1, Page 12	AIR-500	Missing capitalization.	Capitalize the following terms “approach, planning, certification, design-related, human, performance, and issues” in the title.	Corrected.
Paragraph 8a(4), Figure 1, Page 12	AIR-500	Missing period.	Place a period at the end boxes labeled and numbers 2 and 4.	Corrected.
Paragraph 8a(4), Figure 1, Page 12	AIR-500	Remove period at the end of box E.	Boxes A-E are subjects, 1-4 are actions.	Corrected.
Paragraph 9,	ASW-112	“plan”? the program is the program		No requested change was made.

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Page 13		defined in Part 21. The complexity, breadth, and depth of the certification plan and certification activities appears to be what this paragraph discusses.		
Paragraph 9, Page 13	ASW-112	Incorporate this para as a subpara for 9 above		Paragraph incorporated.
Paragraph 9, Page 12	ASW-112		Suggest using “plan” vs. “program”.	Changed plan to program.
Paragraph 9a, Page 13	ASW-112	What systems?		Sentence clarified.
Paragraph 9a, 2 nd Sentence, Page 13.	ASW-112	This sentence doesn’t mean anything in context. Suggest “This means the applicant must consider the flightdeck controls, information, and system behavior as it relates to flightcrew-aircraft interaction. OR delete. It is not needed.		Wording retained because it is the same as the EASA wording.
Paragraph 9a, 3 rd Sentence, page 13	ASW-112	Suggest adding “and analyze” The following sentence talks about “The objective of this analysis . . . “ Yet there is now analysis mentioned in the previous sentences.		Added analyze.
Paragraph 9a, 4 th Sentence, page 13	ASW-112	What analysis?		See disposition above.
Paragraph 9b, 1 st sentence, page 13	ASW-112	Suggest replacing “may be” with “will be”. Integration, complexity and novelty will be....		Sentence rewritten.
Paragraph 9b, 2 nd sentence, page 13	ASW-112		Suggest deleting. Not needed.	Deleted.
Paragraph 9,	AIR-500	Missing capitalization.	Capitalize the terms	Corrected.

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Page 13			“Flightdeck Certification Program” in the title.	
Paragraph 9a, last sentence, Page 13	AIR-500	Be consistent when using paragraph titles. Delete them.	Rewrite to read: Paragraph 15 of this order provides guidance.	Rewritten.
paragraph 9b1. 1st sentence, Page 13	ASW-112	Definition, include in definitions		Not required since it is defined here.
paragraph 9b2. 1st sentence, Page 13.	ASW-112	Definition, include in definitions What is meant by “the flightcrew’s perspective”? Is this the transparency of how integrated the systems are to the crew? Will the crew see the flow-through sequencing of actions between the control activation and the resultant output?		No change. Examples are provided in paragraphs 13-21.
Paragraph 9b. 3a Page 13	ASW-112	WAAS LPV is an example. Not necessarily a hardware change in technology but a software change that affects multiple systems and can affect aircraft handling.		Added sentence to (3)(a).
paragraph 9b. 3b Page 13	ASW-112	“unusual” seems odd here. “New” is “unusual”. So are non-normal procedures. Is there another word available. Suggest using “new”		The word “new” is already in the sentence. The word novel comes to mind but this relates to operational procedures. Will leave as is with no change.
Paragraph 9b, last sentence, Page 12	AIR-500	Missing comma.	Place a comma after the term “novel”.	Comma added.
Paragraph 9c, last sentence,	AIR-500	Clarity.	Must the features be shown to comply with § 25.1302	No change to text

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Page 14				
Paragraph 10, page 14	ASW-112		Make this a sub-paragraph for 9 above	Renumbered to resemble EASA format and numbering.
Paragraph 10a. Page 14	ASW-112	This sentence is not clear. 25.777(a-c) does not include “means of demonstrating compliance” nor does it require that MOC “must be selected”		Sentence rewritten.
Paragraph 10b, 2 nd sentence, Page 14	ASW-112	Integration, novelty, complexity are the only characteristics identified in Paragraph 9.		Deleted design characteristics.
Paragraph 10b, last sentence, Page 14	AIR-500	Change wording.	Rewrite to read: the applicability of these considerations depends on the design characteristics identified in paragraph 9 above.	Used word “above” at end of entire sentence.
Paragraph 10c, Page 14	ASW-112	This paragraph again refers to paragraphs already defined as to their contents. This “referral” concept takes up space and, to some extent, is annoying as one wades through the AC.		Agree, rewritten with new format.
Paragraph 11c, Page 14	ASW-112	Suggest breaking into two or more sentences. i.e., “Once the human performance issues have been identified and means of compliance have been selected and proposed to the FAA, the FAA may agree, as part of the certification planning process, that a specific evaluation, analysis, or assessment of a human factors issue will become part of the demonstration. Once successfully demonstrated, the design will be found in compliance with requirements.”		Paragraph rewritten.

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Paragraph 11d, Page 15	ASW-112	Expand sentence...output from what step? The process in the overall paragraph or in paragraph (d)?		paragraph (d) removed, not needed.
Paragraph 11, c and d, Pages 14 and 15	ASW-112	These two paragraphs appear to relate closely with paragraph on “scope of cert” (para 9). Suggest making these sub paragraphs of para 9.		Deleted d, c matches EASA so it stands.
Paragraph 11, Page 14	AIR-500	Missing capitalization.	Capitalize the terms “means and compliance” in the title.	Corrected.
Paragraph 11c, Page 14	W. Smith, ACE-116A	First sentence is run-on sentence.	Break up sentence into shorter, clearer sentences	Rewritten.
Paragraph 11c, Page 14	W. Smith, ACE-116A	Second sentence has “data is transmitted”, third sentence has “This data”	“data are transmitted”, “These data”	Corrected.
Paragraph 12h, Page 15	AIR-500	Clarity.	Should this be “ACO” instead of just FAA certification office?	Leave wording. Leaves room for more than just the ACO. For example the directorate.
Paragraph 12, Bottom of Page 15	AIR-500	Incorrect formatting.	Remove page break.	Removed.
Paragraph 13, Page 15	ASW-112	This title is confusing. Isn’t the entire AC “guidance for complying with....”?		Title rewritten.
Paragraph 13a(2). Page 15	ASW-112	Suggest rethinking the layout and format of the AC. We seem to repeat stuff discussed earlier. Is there a reason we keep mentioning what is in other paragraphs? Why do we include steps in para 13 that were accomplished in para 9, 10? We keep restarting things.		Reformatted to match EASA numbering and layout.
Paragraph 13, Page 15	AIR-500	Missing capitalization.	Capitalize the terms “Other Requirements” in the title.	Capitalized.
Paragraph	AIR-500	Missing section symbol (§).	Rewrite to read: ...the	Corrected.

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13b, 1 st sentence, Page 15			requirements of § 25.1302...	
Paragraph 13c, last sentence, Page 16	AIR-500	Change wording.	Rewrite to read: ...complying with thus overall objective, the following seven paragraphs provide guidance.	Rewritten.
Paragraph 13c – reference section, Page 16	AIR-500	Missing numbering/labeling.	Label the reference of the paragraphs with a number for reference purposes.	Numbers added.
Paragraph 13c, reference to paragraph 15, Page 15	AIR-500	Missing capitalization.	Capitalize the term “tasks” in title of reference to paragraph 15.	Capitalized.
Paragraph 13d, 2 nd sentence, pages 15 and 16	ASW-112	???		New sentence written beforehand to clarify.
Paragraph 13d, 3 rd sentence, page 16	ASW-112	Makes no sense.		Sentence deleted and new sentence added.
Paragraph 13d, 4 th sentence, page 16	ASW-112	Choose either “§” or “section”. Recommend using §. Spelling out “section” looks funny and out of place. Especially when the §25.130x is often referred to as a “paragraph” when talking. §§		Rewritten to TAD editorial standards.
Paragraph	ASW-112	We did this in the explanatory material.		Sentences 4 and 5 rewritten.

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13d, 4 th sentence, page 16		Why do it again here?		
Paragraph 13d, Page 16	Cathy Swider, AIR-120	Unclear on the 2 parts - There are two parts to this AC: the applicants...the AC.	Please rephrase for better clarity.	Rewritten using EASA version.
Paragraph 13d, Pages 15 & 16	AIR-500	Unnecessary information.	Delete the last sentence.	Want to leave this part. EASA cross reference text retained.
Paragraph 13f(4), Page 16	ASW-112	The use of “section” may be correct but it looks strange. Suggest using the “§” symbol.		You can’t start a sentence with §. You must use the word Section. We also tried to match EASA format so use of section is non-standard.
Paragraph 13, page 16 to Paragraph 15, page 24	ASW-112	This is redundant to the material in “Applicability and Explanatory Material to 25.1302”		Retained to enable cross reference with AMC 25.1302.
Paragraph 13e, 1 st sentence, Page 16	AIR-500	Inconsistent formatting. List title of paragraphs once when referencing.	Delete the title “Background and Scope Assumptions”.	Deleted.
Paragraph 13e, last sentence, Page 16	AIR-500	Change wording.	Rewrite to read: ...for addressing those methods and designs in the following ways:	Leave it. We find it useful to have the title in the paragraph.
Paragraph 13f(2), 1 st sentence, Page 17	AIR-500	Change wording.	Rewrite to read: Section 25.1302(b), requires that, must be provided in a clear...	Agree – makes consistent with above.
Paragraph 13f(3) Page 17	Brady	Reads: the installed equipment must be predictable an unambiguous	the installed equipment must be predictable and unambiguous	Agree – corrected.
Paragraph 13f(3) Page	J. Prickett, ACE-116A,		3 rd sentence: “an” should be “and”	Same – agree.

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17	ACE-100			
Paragraph 13f(3), Page 17	Dave Rich, AIR-110		Typo? Change “predictable an” to “predictable and”	Same – agree.
Paragraph 13f(4), last sentence, Page 17	AIR-500	Change wording.	Rewrite to read: Paragraph 19 provides relevant guidance.	Rewritten.
Paragraph 14c(1), Page 18	Dave Rich, AIR-110		Missing word? ‘such as “indicator bugs” for minimum and critical speeds to support airspeed by the flightcrew.’	Agree – suggest using words “support airspeed management.”
Paragraph 14c(1), last sentence, Page 18	AIR-500	Change wording.	Rewrite to read: Tasks associated with intended functions include all...	Wording changed.
Paragraph 14c(1), last sentence, Page 18	AIR-500	The term “flight management system” has already been defined.	Use the acronym “FMS”.	Corrected.
Paragraph 14c(1)(c), 1 st sentence, Page 18	AIR-500	Add wording.	Rewrite to read: Provisions of this paragraph presume a qualified flightcrew (as specified in §§ 91.1 through 91.21) is trained to use the installed equipment...	Added is.
Paragraph 14c(2), last sentence, Page 19	AIR-500	Delete the colon after the term “tasks”.	Replace with a comma.	Corrected.
Paragraph	AIR-500	Incorrect spacing.	Delete the extra space	Deleted.

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14c(3), 1 st sentence, Page 19			between 25.1302 and (b) in the reference.	
Paragraph 14c(3),4 th sentence, Page 19	AIR-500	Add wording.	Rewrite to read: Sub-paragraphs (1) through (3) of the regulation specify these design requirements.	Agree – rewritten.
Paragraph 14c(3)(b), Page 19	AIR-500	Missing period.	Place a period after the term “making”.	Added.
Paragraph 14c(3)(4)(c), Page 20	AIR-500	Change wording.	Rewrite to read: For controls, the requirement means that the flightcrew must be...	No change. Statement is correct as it stands.
Paragraph 14c(5), 2 nd sentence, Page 20	AIR-500	Incorrect spacing.	Remove extra space from between § 25.779 and (a).	Removed.
Paragraph 14c(5), last sentence, Page 20	AIR-500	Incorrect spacing.	Remove extra space from between § 25.777 and (a).	Removed.
Paragraph 14c(6) Page 20	W. Smith, ACE-116A	First line contains “don’t”	Use “did not”	Changed.
Paragraph 14c(6)(c), 1 st sentence, Page 20	AIR-500	Missing comma.	Place a comma after the term “controls”.	Added.
Paragraph 14c(6)(d) Page 21	W. Smith, ACE-116A	Two periods at end of sentence	Delete one period	Deleted.
Paragraph 14c(6)(d)	Brady, ACE-111	Reads: requirements in a sufficiently general	Take out second period: requirements in a	Deleted.

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Page 20		way..	sufficiently general way.	
Paragraph 14c(6)(d), Page 21	AIR-500	Typo.	Delete the extra period after the term “way”.	Deleted.
Paragraph 14c(7)(b), Page 21	W. Smith, ACE-116A	Fourth line “factors which”	“factors that”	Corrected.
Paragraph 14c(7)(b), Page 21	W. Smith, ACE-116A	Eighth line “do not need”	“does not need”	Corrected.
Paragraph 14c(7)(b), Page 21	J. Prickett, ACE-116A	5 th sentence: there is an extra “between”	Remove extra “between	Removed.
Paragraph 14c(7)(b), Page 21	Brady, ACE-111	Reads: distinguishes between the between system behavior	distinguishes between the system behavior	Corrected.
Paragraph 14c(7)(b), Page 21	Dave Rich, AIR-110		Change “do” to “does” in “the flightcrew needs to know how to use the system and its limitations, but do not need to know the actual computer code used to make the system work.”	Changed.
Paragraph 14c(7)(b), last sentence, Page 21	AIR-500	Change wording.	Rewrite to read: ...but does not need to know the actual computer code used to make the system work.	Rewritten.
Paragraph 14c(8), Page 21	W. Smith, ACE-116A	Fifth line, “predicable”	“predictable”	Corrected.
Paragraph 14c(8)(a),	R. Joslin, AIR-100		Add the words “ <i>and/or flying qualities</i> ” to the	Added this because flying quality is not the same as performance.

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Page 21			sentence so it reads “Under some circumstances, the same actions may affect airplane performance <i>and/or flying qualities</i> ”	
Paragraph 14c(8)(a), 1 st sentence, Page 21	AIR-500	Missing section symbol (§).	Rewrite to read: System behavior must be predictable and unambiguous (§ 25.1302(c)(1)) because the actions...	Rewritten.
Paragraph 14c(8)(a), 2 nd sentence, Page 21	AIR-500	Change wording and delete section symbol (§). Incorrect spacing.	Rewrite to read: Section 25.1302(b)(3) also requires flightcrew awareness. Remove extra space from between § 25.1302 and (b).	Corrected.
Paragraph 14c(8)(a), last sentence, Page 21	AIR-500	Missing comma.	Place a comma after the term “case”.	Comma added.
Paragraph 14c(8)(a), last sentence, Page 21	AIR-500	Missing section symbol (§).	Rewrite to read: ...about the result of possible flightcrew selections, § 25.1302(b)(1).	Symbol added.
Paragraph 14c(10), Page 22	W. Smith, ACE-116A	Eighth line “procedure which”	“procedure that”	Corrected.
Paragraph 14c(10)(c), page 22	R. Joslin, AIR-100		Add the words “ <i>well intentioned</i> ” to the first sentence so that it reads “...qualified, <i>well intentioned</i> , and trained	Leave as written. We have discussion in good faith later. Addressed in para 10(e).

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			flightcrew”	
Paragraph 14c(10)(c), page 22	R. Joslin, AIR-100		Change the word “ <i>projected</i> “ to ” <i>predicted</i> “	Predicted is better.
Paragraph 14c(10)(d), 3 rd sentence, Page 23	AIR-500	Improper capitalization.	Remove the capitalization from the term “subpart” in the reference unless it begins a sentence.	Corrected.
Paragraph 14c(10)(e), 2 nd sentence, Page 23	AIR-500	Delete the colon the after the term “include”.	Replace with a comma.	Replaced.
Paragraph 14c(10)(e), 3 rd sentence, Page 23	AIR-500	Define the acronym “ARAC”.	Use the acronym after the first usage of the term.	Corrected.
Paragraph 14c(10)(e), 4 th sentence, Page 23	AIR-500	Missing comma.	Place a comma after the term “occurs”.	Comma added.
Paragraph 14c(10)(f), Page 23	R. Joslin, AIR-100		Add the words “ <i>or who is physiologically impaired</i> ” at the end of the first sentence	Leave – gives different meaning.
Paragraph 14c(10)(g), Page 23	W. Smith, ACE-116A	This section appears to duplicate a statement made in (e) on the prior page	Either add detail to clarify why stated again or delete	Deleted g.
Paragraph 14c(10)(g), Page 23	Dave Rich, AIR-110		Is this an intentional repetition of the text in (e) or accidental?	Deleted g.
Paragraph 14c(10)(g), last sentence, Page 23	AIR-500	Missing comma.	Place a comma after the term “situation”.	Deleted g.

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Paragraph 14c(10) (h&i), Page 23 and 24	R. Joslin, AIR-100		Replace the phrase “within the available time” with <i>“in a timely manner commensurate with the severity of the situation”</i>	Do a search to find words in doc and then respond. This is the only place it is used. The suggest phrase is more exact so it is used.
Paragraph 15a, 1 st sentence, Page 24	AIR-500	Delete colon and incorrect placement of quotation mark.	Rewrite to read: Section 25.1301(a)(1) requires that each item of installed equipment must “be of a kind and design appropriate to its intended function”.	Corrected.
Paragraph 15c, Page 24	AIR-500	Missing comma.	Place comma after the reference to § 25.1302.	Comma added.
Unidentified paragraph under paragraph 15c, bullet section, Page 24	AIR-500	Missing paragraph identifier/labeling.	Label the unidentified paragraph with a letter or number.	Labeled.
Paragraph 15d, Page 24	R. Joslin, AIR-100		Add a subparagraph with the question <i>“Is it hazardly misleading ?”</i>	Does not apply to definition of intended function.
Paragraph 15d, Page 24	ASW-112	Suggest deleting. It essentially states the same thing that the first sentence in b. states.		Retained.
Paragraph 15d, Page 24	ASW-112	Not needed.		Retained.
paragraph 15(c and d), Page 24.	ASW-112	Suggest combining (c) and (d). Delete “this type of information . . . “ in (c) The two paragraphs are tightly integrated, make them part of a paragraph. The sentences talking about		c and d are in a format to cross-reference with EASA.

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		POH, OpsMans appear to drive to one level of detail but (d) drives to another. UNLESS “This type of information . . . “ sentence is clarified.		
Paragraph 15d(8), Page 25	ASW-112	These appear to be require greater level of detail than is mentioned in c. above (“This type of information is of the level typically provided in a pilot handbook or operations manual. . . “		Test retained.
Paragraph 16a, Page 25	AIR-500	Add wording.	Rewrite to read: ...and manage the airplane and its flight control surfaces, systems, and other equipment. Controls may include:	Do not agree
Paragraph 16a, Page 25	ASW-112	Consider deleting this since it is a definition included in “Terms and Definitions”, therefore redundant. Start para with “Controls may . . . “		Change made.
Paragraph 16a, Page 25	ASW-112	Suggest deleting “for purposes . . .” Are there other definitions for controls in other AC’s, (particularly the new Controls AC)? Plus, we have defined in definitions. “For the purposes . . .” does not add anything to the paragraph.		Deleted.
Paragraph 16a, (1), Page 25.	ASW-112	Move the (1) wording here.		Moved to (1).
Paragraph 16a(1), Page 25	AIR-500	Change wording.	Rewrite to read: Equipment in the flightdeck such as:	Leave as is.
Paragraph 16b(1), 1 st sentence, Page 25	AIR-500	Incorrect spacing.	Remove the extra space from between § 25.1302 and (b).	Removed.

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Paragraph 16b(1)f, Page 25	ASW-112		Too wordy. If a parenthetical phrase is needed to explain, then is unclear. Suggest rewording: Provide adequate feedback to the flightcrew.	Rewritten
Paragraph 16(b)(2), Page 25	R. Joslin, AIR-100		Add a subparagraph “ <i>Accessibility within functional reach of the anthropometric design</i> ”	Need clarification on what is not already covered. Also look at definition for functional reach.
Paragraph 16(b)(2), Page 26	R. Joslin, AIR-100		Add a subparagraph “ <i>functional grouping</i> ”	Functional grouping is already referenced in f.
Paragraph 16(b)(3), Page 26			Delete, it’s a dangler.	Made paragraph (3).
Paragraph 16c(1), Page 27	W. Smith, ACE-116A	Third line has statement, “The applicant evaluate consequences”	Perhaps “must” should go between “applicant” and “evaluate”?	Word added.
Paragraph 16c(1), Page 27	Dave Rich, AIR-110		Missing word? “The applicant evaluate consequences of control activation to show that they are predictable and obvious to each flight crewmember.”	Word added.
Paragraph 16c(1), Page 27	R. Joslin, AIR-100		Add the phrase “ <i>and phase of flight</i> ” at the end of the first sentence	Phrase added.
Paragraph 16c(1), Page 27	R. Joslin, AIR-100		Add the words “ <i>operating sense</i> ” to the sentence that begins with “ <i>Controls can be made distinguishable or</i>	Added “motion and effect.” e.g. 25.779.

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			<i>predictable by differences in.... “</i>	
Paragraph 16c(1), Page 27	AIR-500	Incorrect formatting.	Move the second line up directly after terms “distinguishable and predictable controls”.	Paragraph given an “a.”
Paragraph 16c(1), 3 rd sentence, Page 27	AIR-500	Clarity.	Missing word or words between the terms “applicant and evaluate”.	Sentence rewritten and added a statement on single controls.
paragraph 16c(1), 5th sentence, Page 27	ASW-112		Consider adding “Also include using a single control for multiple functions.” Multifunction controls are out there and can be confusing especially if “little or no familiarization is required”.	Paragraph rewritten
Paragraph 16c(2)(a), Page 27	R. Joslin, AIR-100		Add the sentence “ <i>Electronic touchpad buttons shall have all text visible and readable with at least 75% of the button in view</i> ”. Statement based on a recent SAD decision related to the new Garmin touchpad	No change. will consider adding to AIR 120 controls AC.
Paragraph 16c(2)(a), Page 27	W. Smith, ACE-116A	Third sentence reads, “Section 25.1302(a) and (b) requires that information necessary to accomplish defined tasks and that controls and information intended for flightcrew use must be provided clearly at a resolution and precision appropriate to the task.” is	Reword to something like, “Section 25.1302(a) and (b) requires that information necessary to accomplish defined tasks, along with controls and information intended for	Rewritten.

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		difficult to read and comprehend	flightcrew use, must be provided clearly at a resolution and precision appropriate to the task.	
Paragraph 16c(2)(a) Page 27	R. Joslin, AIR-100		Add the words “ <i>with harness fastened</i> ” after the words “normally seated position”	“Normally seated position” includes the position taken with the harness fastened, so the extra phrase is unnecessary.
Paragraph 16c(2)(a), 1 st sentence, Page 27	AIR-500	Missing comma.	Place a comma after the term “controls”.	Corrected.
Paragraph 16c(2)(a), 2 nd sentence, Page 27	AIR-500	Missing AC title.	Place the title to AC 25-11A after the listing.	Corrected.
Paragraph 16c(2)(a), 2 nd sentence, Page 27	AIR-500	Incorrect spacing.	Remove the extra space from between Chapter 5 and (c).	Corrected.
Paragraph 16c(2)(a), 2 nd sentence, Page 27	AIR-500	Incorrect citation of reference. Change wording.	Rewrite to read: ...Chapter 5 paragraph (c)(2).	Agree – add word “paragraph” – Corrected.
Paragraph 16c(2)(a), 3 rd sentence, Page 227	AIR-500	Missing comma.	Place a comma after the terms “tasks” and “use”.	Sentence rewritten.
Paragraph 16c, (2)(c) Page 27	ASW-112	This is unclear and confusing. Reword to clarify.		Last two sentences deleted to clarify.
Paragraph 16c, (3),(a), Page 27	ASW-112	Not necessary, disrupts the reader. Insertion of the section citation in this manner appears regularly through this section and others. Delete them all, it is		Disagree, it is necessary. Legal says every time we use must a rule is required as reference.

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		unnecessary.		
Paragraph 16c(2)(e), Page 27	R. Joslin, AIR-100		Change the word “ <i>should</i> ” to “ <i>shall</i> ” to denote mandatory compliance in the sentence “In all cases, the applicant <i>shall</i> show the use of icons.... “	Leave – not rule language. Look at correction regarding removal of the word “rate” and perhaps the word “made” Change to rate of errors made.
Paragraph 16c(3), Page 28	AIR-500	Missing labeling of paragraph.	Label move paragraph directly after the title of subparagraph (3).	Corrected.
Paragraph 16c(3), Page 28	AIR-500	Missing section symbol (§).	Rewrite reference to read: (§ 25.1302(a)).	Corrected.
Paragraph 16d(1), Page 28	R. Joslin, AIR-100		Add the words “ <i>or aircraft upset</i> ” at the end of the last sentence.	Added.
Paragraph 16d(1), Page 28	W. Smith, ACE-116A	Concludes with statement, “...unless the controls need to be accessed with the restraint locked in a hard landing.”	Delete, “...in a hard landing”, reference to just restraint locked is sufficient	Deleted.
Paragraph 16d(2), Page 28	ASW-112	Unclear as to the purpose of this statement. How does this relate to showing compliance with 1302? Isn't this covered when showing compliance with 777(c)?		Rewritten.
Paragraph 16d(2), Page 28	AIR-500	Change wording.	Rewrite to read: ...arrangement of each flightdeck control permits full and unrestricted movement of that control...	Rewritten.
paragraph 16d(3), 2 nd sentence, Page 28	ASW-112	A lot of references to 1302(b) in a lot of different places. This is necessary? Consider deleting “14 CFR 25.1302 (b) requires that information intended for		Corrected.

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		flightcrew use must be provided in a clear and unambiguous form, be accessible and enable flightcrew awareness. “		
Paragraph 16d(3), Page 28	W. Smith, ACE-116A	Sixth line “device which”	“device that”	Corrected.
Paragraph 16d(3), 2 nd sentence, Page 28	AIR-500	Missing section symbol (§) and delete extra space in reference.	Rewrite to read: 14 CFR § 25.1302(b) requires that information intended...	Rewritten.
Paragraph 16d(3), 2 nd sentence, Page 28	AIR-500	Missing comma.	Place a comma after the term “accessible”.	Comma added.
Paragraph 16d(3), 3 rd sentence, Page 28.	ASW-112	This is not a complete thought. Is there a “but” statement missing. As it stands it does not make sense. I think it ties to the next sentence, however, as written, is confusing and unclear. The tie to the following sentence is unclear.		Rewritten.
Paragraph 16d(3), 3 rd sentence, Page 28.	ASW-112	Add “for aircraft requiring dual pilots.		Not necessary.
Paragraph 16d(3), 3 rd sentence, Page 28.	ASW-112	Doesn’t MMEL take this into consideration?		Sentences rewritten for clarity. Not part of MMEL.
Paragraph 16d(3), last sentence, Page 28	AIR-500	Incorrect spacing.	Remove extra space from between the terms “accessibility” and “must”.	Corrected.
Paragraph 16d(3), last	ASW-112	These citations to the §25.1302 are sprinkled throughout this chapter either		Disagree, they are necessary. Legal says every time we use must

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sentence, Page 28		parenthetically or as “hangers” on sentences. This is annoying to the reader and confusing. Stop it.		a rule is required as reference.
Paragraph 16d(3), 3rd sentence, Page 28.	ASW-112	Add “for aircraft requiring dual pilots.		Not necessary.
Paragraph 16d(3), 3rd sentence, Page 28.	ASW-112	Doesn’t MMEL take this into consideration?		No, the sentence clarifies the controls.
Paragraph 16d(3), last sentence, Page 28	ASW-112	These citations to the §25.1302 are sprinkled throughout this chapter either parenthetically or as “hangers” on sentences. This is annoying to the reader and confusing. Stop it.		Disagree, they are necessary. Legal says every time we use must a rule is required as reference.
Paragraph 16d(4), Page 29	ASW-112	If x-ref to 779 desired, then find another way to do it. The second sentence needs reword or delete it.		Rewritten.
Paragraph 16e, Page 29	AIR-500	Missing capitalization.	Capitalize the term “controls”.	Corrected.
Paragraph 16e, Page 29	AIR-500	Missing period.	Place a period after the term “controls” in the subparagraph title.	Placed.
Paragraph 16e(1)(a), Page 29	R. Joslin, AIR-100		Add the words “ <i>within the aircraft’s approved operational envelope</i> ” so the sentence read “Turbulence or vibration <i>within the aircraft’s approved operational envelope</i> ”	Added.
Paragraph 16e(1)(b), 2 nd sentence,	AIR-500	Incorrect spacing.	Remove extra space from between the terms “must” and “afford”.	Corrected.

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Page 29				
Paragraph 16e(1)(c), Page 29	ASW-112		add in the event there is a non-normal situation or a loss of control event.	If is better English than “in the event.” If there is a non-normal situation or a loss of control event...
Paragraph 16e(2)(a), page 29.	ASW-112	Is there some aspect of display-control compatibility we need to talk about that is not covered by other AC material (779 for instance)? This is a regurgitation of 777(b). If there is not a specific 1302 concern then delete this paragraph.		Paragraph rewritten.
Paragraph 16e(2)(a), Paragraph 16e(2)(a), 2 nd Sentence, page 29.	ASW-112		Delete. Stated this many times before. Redundant.	Deleted.
Paragraph 16e(2)(a), 2 nd sentence, Page 29	AIR-500	Incorrect spacing.	Remove the extra space from between the reference 25.1302 and (b).	Corrected.
Paragraph 16e(2)(a), 4th Sentence Page 29	ASW-112	Don't tie to a 'rotary' knob. There are other control devices that may not operate or control in line with flightcrew expectations. I.e., track balls that move the cursor up with forward roll compared to other flight deck "controls" (trim controls for instance) that command a "nose down" or "down" motion.		Paragraph rewritten.
Paragraph 16e(2)(a), 5th	ASW-112	This statement "hangs". Does not seem to fit. Does not seem to logically connect with preceding or following		Paragraph rewritten.

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sentence, Page 29.		sentence. Talks specifically about 'response' to info. What about need to change parameter, etc. Suggest delete.		
Paragraph 16e(2)(a), 4 th sentence, Page 29	AIR-500	Missing comma.	Place a comma after the term "example".	Placed.
Paragraph 16e(2)(b), 1 st sentence, Page 29	AIR-500	Incorrect spacing.	Remove the extra space in front of the term "requires".	Deleted.
Paragraph 16e(2)(c), Last sentence, Page 30	ASW-112	What are acceptable error rates and access times (relative to the function and "urgency" of the action?)		Part of third sentence deleted.
Paragraph 16e(2)(c), Last sentence, Page 30	ASW-112	777 doesn't talk about types of errors, error rates, or access times, (does talk about confusion.) Suggest deleting or talk about confusion to tie back to 777.		Text added and subject clarified.
Paragraph 16e(2)(c), 3 rd sentence, Page 30	AIR-500	Incorrect spacing.	Remove extra space from between the terms "must" and "show".	Removed.
Paragraph 16e(2)(d), 2 nd sentence, Page 30	AIR-500	Incorrect spacing.	Remove extra space from in front of the term "or".	Removed.
Paragraph 16e(2)(d), last sentence, Page 30	AIR-500	Change wording.	Rewrite to read: Section 25.1302(b)(2) requires that information intended for use by...	Rewritten.
Paragraph 16	ASW-112	flightcrew members or flight		flightcrew members is correct.

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e(2)(e), Page 30.		crewmembers		
Paragraph 16f(1), Page 30.	ASW-112	Delete “. . . or followed by . . .” If the input was correct, the system accepted it, but did not “follow” the input, sounds like there is a malfunction. Suggest adding “For example, if an installed electronic flight bag (EFB) does not provide adequate feedback, the flightcrew may spend more time assessing whether or not the EFB accepted their input to the exclusion of other primary flight deck duties.” As an example.		Partly accepted – removed the words “or followed.”
Paragraph 16f(2)(1), last sentence, Page 30	AIR-500	Incorrect spacing.	Remove the extra space from the between the reference of “§ 25.1302 and (b).	Space removed.
Paragraph 16f(2), 1 st sentence, Page 30	AIR-500	Incorrect spacing.	Remove the extra space from the between the reference of “Section 25.1302 and (b).	Space removed.
Paragraph 16f, (2)d, Page 31	Cathy Swider, AIR-120	Confusing phrasing- If awareness is required for safe operation feedback/awareness...	Add commas – If awareness is required for safe operation, feedback....	Rewritten.
Paragraph 16f(2)(d), 2 nd sentence, Page 31	AIR-500	Missing comma.	Place a comma after the term “operation”.	Added.
Paragraph 16f(2)(d), Page 31	ASW-112	Target speed is an actuator or indication of an actuator’s travel?		Agree, removed target speed due to possible confusion with this example.
Paragraph 16f(2)(d),	ASW-112	Delete, makes no sense.		Paragraph retained.

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Page 30.				
Paragraph 16f(2)(d), Page 30.	ASW-112	Move up to (1). Leads into control feedback.		Paragraph retained.
paragraph 16f(4), 2 nd sentence, Page 31	ASW-112	delete, same as previous sentence		Deleted.
Paragraph 16f(4) Page 31	ASW-112	Delete. “. . . and is responding as expected.” Is not a function of tactile response.		Deleted.
Paragraph 16f, 4, Page 31	Cathy Swider, AIR-120	Redundant, confusing phrasing- Controls (primarily flight and thrust controls) that. . .unrelated displays should provide tactile feedback.	Remove text/add comma - Controls that. . .unrelated displays, should provide tactile feedback.	Corrected.
Paragraph 16f, 4, Page 31	W. Smith, ACE-116A	Third line, “feedback which “	“feedback that”	Corrected.
Paragraph 16f(4), 2 nd sentence, Page 31	AIR-500	Missing comma.	Place a comma after the term “example”.	Placed.
Paragraph 17a(1), Bullet Section, Page 31	AIR-500	Missing period.	Place a period at the end of each word phrase in the bullet section.	Bullets changed to letters and periods added.
Paragraph 17b.(1)(b), First sentence, Page 32	ASW-112	Reword this sentence fragment, it does not make sense. .		Paragraph rewritten.
Paragraph	ASW-112	This is confusing. Suggest using		We believe the human factors

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17b.(1)(b), 2 nd Sentence, Page 32		industry (as in aviation) standard wording. Is “qualitative display format” a commonly used term? Does the audience reading this document know what a “qualitative” display format is? How prevalent is the use of “qualitative” and “quantitative” displays in the real world?		audience would know the difference. The words (e.g. digital) were added to quantitative to help distinguish the difference. We also made presentation plural.
Paragraph 17b.(1)(c), Page 32	ASW-112	Motherhood? Clarify		Added suggested sentence.
Paragraph 17b(2), 1 st sentence, Page 32	AIR-500	Missing comma.	Place a comma after the term “lines”.	Comma added.
Paragraph 17b(2), Page 32	R. Joslin, AIR-100		Add the words “ <i>or turbulence</i> ” in the sentence that ends with “...adverse conditions such as vibration”	Words added.
Paragraph 17b(3)(a), last sentence, Page 33	AIR-500	Missing period.	Place a period after “AC 25-11A”.	Placed.
Paragraph 17b(3)(b), 2 nd sentence, Page 33	AIR-500	Missing comma.	Place a comma after the term “yellow”.	Comma added.
Paragraph 17b(3)(e), 1 st sentence, Page 33	AIR-500	Incorrect spacing.	Remove the extra space from the between the reference of “§ 25.1302 and (b).	Space removed.
Paragraph 17c(1)(a),	AIR-500	Missing comma.	Place a comma after the number (3).	Placed.

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4 th sentence, Page 34				
Paragraph 17c(2)(b), 2 nd sentence, Page 35	AIR-500	Incorrect reference.	Delete the letter (a) found after the term “must”.	Reference to rule 25.1302 added.
Paragraph 17c(2)(b), 3 rd sentence, Page 35	AIR-500	Missing comma.	Place a comma after the term “information”.	Comma placed.
Paragraph 17c(2)(d), last sentence, Page 35	AIR-500	Missing comma. Add wording.	Place a comma after the term “priority”. Add the title to AC 25.1322.	Comma added.
Paragraph 17c(3), 2 nd sentence, Page 35	AIR-500	Incorrect spacing.	Remove the extra space from between the terms “must” and “show”.	Space removed.
Paragraph 17c(3), last sentence, Page 35	AIR-500	Missing comma.	Place a comma after the term “operation”.	Placed.
Paragraph 18a(1)(a), 2 nd sentence, Page 35	AIR-500	Missing comma.	Place a comma after the term “safely”.	Placed.
Paragraph 18a(2), Page 35	ASW-112		Note sure if this adds anything. It is not needed. Delete.	Paragraph retained.
Paragraph 18a(5), 4 th sentence, Page 36	AIR-500	Incorrect spacing.		Sentence deleted.
Paragraph	AIR-500	Incorrect spacing.	Remove the extra space	Corrected.

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18a(5), 4 th sentence, Page 36			from the between the reference of “§ 25.1302 and (c).	
Paragraph 18a(5), 5 th sentence, Page 36	AIR-500	The term “full authority digital engine controls” has already been defined.	Use the acronym “FADEC”.	Corrected.
Paragraph 18a(5), 5 th sentence, Page 36	ASW-112	What about trim systems? Does the crew need to be aware of the status of an autotrim system or trim-following?		The answer depends somewhat on the exact system. For example, at the higher level, the crew needs to be aware if the system is operating correctly but not necessarily the exact trim position during normal operation. The answer is conditional. No change to text.
Paragraph 18b, Page 36	ASW-112	Delete, this is paragraph 18.		Paragraph retained.
Paragraph 18b, Page 36	AIR-500	Missing comma.	Place a comma after the reference to § 25.1302.	Corrected.
Paragraph 18b, Page 36	AIR-500	Incorrect spacing.	Remove the extra space from between the terms “applicant” and “must”.	Corrected.
Paragraph 18b(2), Page 36	AIR-500	Add wording.	Place the term “and” after the term appropriate.	Added.
Paragraph 18c(2), 2 nd sentence, Page 37	AIR-500	Incorrect formatting.	Move the section symbol to the next line to be included with related information.	Symbol moved.
Paragraph 18c(3)(a) ₂ , Page 37	AIR-500	Delete the number <u>1</u> .	Move the text up to be included directly after the last sentence in subparagraph (a).	Text. moved. (Now 18c(3)).

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Paragraph 18c(3)(a), Page 37	ASW-112		Delete. Proposing a means to show compliance does not meet the requirements of 1302.	Text retained and merged with (a).
Paragraph 18c(3)(b), Page 37	ASW-112		Delete. Para (a) is good intro to the sub para's.	Text retained.
Paragraph 18c(3)(b) <u>2</u> , Page 37	ASW-112		Add sentence	Sentence added.
Paragraph 18c(3)(b) <u>4</u> , last sentence, Page 37	AIR-500	Missing AC title.	Place the title of AC 25.2329-1B immediately after it.	Title placed.
Paragraph 18c(3)(b)(4), 2 nd sentence, Page 37	AIR-500	Incorrect spacing.	Remove the extra from between the terms "must" and "be".	Removed.
paragraph 18c(4)(b), 1st sentence, Page 37	ASW-112		Reword. This is confusing. For instance, why would one choose an analysis method that was incomplete?	Sentence rewritten.
Paragraph 18c, (5)(a) Page 38	ASW-112		Change to ". . . and supervised by . . ."	Sentence rewritten.
Paragraph 18c, (5)(a) Page 38	ASW-112	What is meant by "under supervision of the flightcrew"? Where on the continuum is "supervised" from "monitored"?		Sentence rewritten.
Paragraph 18c, (5)(a) <u>3</u> , 1 st Sentence, Page 389	ASW-112	Do we need to add something about "without resulting in excessive flightcrew workload to maintain aircraft control"???		Not necessary, paragraph retained.

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Paragraph 18c, (5)(a)3, Page 38	J. Prickett, ACE-116A	Spelling Error	3 rd sentence: “looses” should be “loses”	Corrected.
Paragraph 18c(7)(a), Page 39	ASW-112	At what level of understanding by the crew?		Sentence rewritten.
Paragraph 18c, (7)(a), Page 39	AIR-500	Missing comma.	Place a comma after the terms “must” and (1).	Sentence rewritten.
Paragraph 18c,(7)(c), Page 39	AIR-500	Unnecessary bold. Typo.	Remove the bold from the comma.	Bold removed.
Paragraph 19a(2), Page 40	AIR-500	Change wording.	Rewrite to read: To comply with § 25.1302(d), that a design enables the flightcrew to...	Corrected.
Paragraph 19a(3), last sentence, Page 40	AIR-500	Improper capitalization.	Remove the capitalization from the term “to”.	Removed.
Paragraph 19a, (4)(a), Page 40	ASW-112		delete (a)	Retained.
Paragraph 19a, (4)(b), Page 40	ASW-112	Clarify this statement		Retained.
paragraph 19a, (5) Page 41	ASW-112	Not needed if it is explicit in the rule and it was discussed previously.	Delete paragraph	Retained.
Paragraph 19a(5), last sentence, Page 41	AIR-500	Missing dash mark.	Place a dash mark between the terms “design-related”.	Added dash.
Paragraph	ASW-112		Delete or move to the	Retained.

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19a(6), Page 41			beginning of the paragraph.	
Paragraph 19a(6), Page 41	ASW-112		Delete, not needed. Understood as within the scope of the AC.	Retained.
Paragraph 19a(6), Page 41	ASW-112		Delete unless there is different information in these than the MOC's described in para 24	Retained.
Paragraph 19a(8), 1 st sentence, Page 41	AIR-500	Change wording.	Rewrite to read: ...discussed in paragraphs 21 through 24 by itself or in combination.	Corrected.
Paragraph 19a(8), 3 rd sentence, Page 41	AIR-500	Change wording.	Rewrite to read: ...other related references to understand error occurrence.	Changed.
Paragraph 19a(8)(a), 1 st sentence, Page 41	AIR-500	The term "aircraft certification office" has already been defined.	Use the acronym "ACO".	Corrected.
Paragraph 19a(8)(c), 3 rd sentence, Page 42	AIR-500	Missing comma.	Place a comma after the term "cases".	Comma added.
Paragraph 19a(8)(d), 1 st sentence, Page 42	AIR-500	Improper capitalization.	Remove the capitalization from the following terms: "demonstrations and tests".	Removed.
Paragraph 19a(9) Page 42	ASW-112	Consider rewording this. If some errors do occur then were they detected, managed, isolated, etc before they had a negative impact on the system? We said previously that "error-free" does not exist. This sentence belies that		Rewritten.

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		concept by insinuating that errors are not allowed.		
Paragraph 19a(9), Page 42	AIR-500	Missing paragraph identifier.	Identify the paragraph that appears after subsection (9)(c) or combine it with the previous subsection.	Made to (d).
Paragraph 19b(9)(a), Page 42	ASW-112	Presenting the flight plan prior to acceptance allows the crew to detect the error themselves. It does not provide the flightcrew with awareness of errors.		No change made. Statement changes the meaning.
Paragraph 19b(2)(a) <u>2</u> , last sentence, Page 42	AIR-500	Change wording.	Rewrite to read: Paragraph 17 contains additional guidance to determine...	Title deleted.
Paragraph 19b(2)(b) <u>1,2</u> and <u>3</u> Page 43	Cathy Swider, AIR-120	Are <u>1</u> , <u>2</u> , <u>3</u> really necessary? The wording is not consistent with previous sections. Seems to repeat things mentioned earlier.	Remove <u>1</u> , <u>2</u> , <u>3</u> or reword. “Nevertheless” and “For this reason” don’t fit the format. The structure is like an essay.	Yes, they are necessary. They clarify our position from the basic EASA text. The wording is consistent with our text and EASA text.
Paragraph 19b(2)(b) <u>1</u> , 4 th sentence, Page 43	AIR-500	Missing dash mark.	Place a dash mark between the terms “non-normal”.	Dash added.
Paragraph 19b(2)(c) <u>1</u> , Page 43	Cathy Swider, AIR-120	Inconsistent with examples in earlier sections – <u>1</u> Examples include monitoring systems...	Add the <u>1</u> to 19b(2)(c) ; eliminate separate section.	Moved text up.
Paragraph 19b(2)(c) <u>1</u> , 1 st sentence, Page 43	AIR-500	Incorrect formatting.	Move the text up a line to be included with subparagraph (c).	Moved text up, now 19b(2)(c).
Paragraph 19b(2)(c) <u>1</u> , 1 st sentence,	AIR-500	Change wording.	Rewrite to read: Examples include monitoring systems such as TAWS	Rewritten. Moved text up, now 19b(2)(c).

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Page 43			and TCAS.	
Paragraph 19b(3), Page 44	J. Prickett, ACE-116A	Spelling Error	1 st sentence: “Should” should not be capitalized	Corrected.
Paragraph 19b(3), Page 44	Cathy Swider, AIR-120	Wrong case – (3) The applicant Should...	Use lower case – (3) The applicant should...	Corrected.
Paragraph 19b(3), Page 44	AIR-500	Improvement capitalization.	Remove the capitalization from the term “should”.	Corrected.
Paragraph 19b(3)(b), Page 44	ASW-112		Change the sequence. Priority is system design to catch and alert, followed by reliance on training and CRM. However, reliance on the pilot to detect should be the last resort.	Last sentence rewritten.
Paragraph 19b(3)(c), Page 44.	ASW-112	How does this statement relate to AC 20-88?		See the Purpose statement to AC 20-88, which is referenced.
Paragraph 19b(3)(c), Page 44	AIR-500	Incorrect spacing.	The term “powerplant” is one word not two separate ones.	Corrected.
Paragraph 19b(4), Page 44	ASW-112	Precedent for what?		Added the word “design” to the sentence for clarification.
Paragraph 19b(4), last sentence, Page 44	AIR-500	Missing comma.	Place a comma after the reference paragraph 24a(7).	Comma added.
Paragraph 19c(c)(1), Page 44	AIR-500	Missing comma.	Place a comma after the term “to”.	Comma added.
Paragraph 19c(4),	ASW-112		Change to “flightcrew performance”? If we	Procedures is correct. Used AMC wording.

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Page 45			evaluate the “procedures” we learn that the procedures are adequate. This paragraph’s topic is establishing the reasonable expectation the flightcrew will use the controls to correct the error.	
Paragraph 19d(1), Page 45.	ASW-112		Delete (e) and move here. Delete (d) (see comment below)	Disagree, paragraph retained.
Paragraph 19d(1)(a), Page 45.	ASW-112		Delete. This is error detection	Disagree, sentence retained.
Paragraph 19e(1), Page 45	ASW-112		Delete, evident from the rule. Motherhood.	Sentence deleted.
Paragraph 20a(2), Page 46	AIR-500	Delete the section symbol (§).	Rewrite to read: Section 25.1302 requires that:	Rewritten.
Paragraph 20a(2)(a), Page 46	AIR-500	Incorrect formatting.	Delete the labeling of (a) and move the text up a line to be included with subparagraph (2).	Corrected, (a) is deleted.
Paragraph 20a(3), bullet section, Page 46	AIR-500	Missing period.	Place a period at the end of each reference to paragraph 20.	Corrected.
Paragraph 20a(3)(b), Page 46.	ASW-112		Delete. Not needed.	This cross-references with EASA and must remain.
Paragraph 20b(2), 2 nd sentence,	AIR-500	Change wording.	Rewrite to read: ...and abbreviations recommended in ICAO	Corrected.

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Page 47			8400/5.	
Paragraph 20b(2), 4th sentence, Page 47	ASW-112	Agree with sentence, but what is “inappropriate standardization”? Who is the sentence targeting, the applicant or the FAA?		Sentence rewritten.
Paragraph 20c(1), 6 th sentence, Page 47	AIR-500	Missing comma.	Place a comma after the term “cases”.	Comma added.
Paragraph 20d(3), Page 48	Cathy Swider, AIR-120	Should this stand alone? (3) An example of poor physical ...position.	Add to (2) and eliminate separate section. Or is part of (3) missing?	Rewritten, (3) deleted and added to (2).
Paragraph 20e(3), (a) and (b), Page 49	Cathy Swider, AIR-120	These are examples of design features, while (2) and (4) discuss what needs to be evaluated. May be confusing.	Remove (3)(a) and (b).	Text reorganized for clarity.
Paragraph 21, Page 49	ASW-112	Delete. Does not discuss consideration in selecting MOC. However, the overall title “Means of Compliance” should encompass 22,23,24.		Required to cross-reference with EASA.
Paragraph 21, 1 st sentence, Page 49	AIR-500	Change wording.	Rewrite to read: paragraphs 21 through 24 discuss considerations in selecting means of compliance.	Rewritten.
Paragraph 22(a)(5), Page 50	ASW-112		Delete, not necessary. Don’t need to shill for upcoming paragraphs.	Required to cross-reference with EASA.
Paragraph 22b, Page 50	Cathy Swider, AIR-120	Confusing phrasing – The choice of an appropriate compliance means or combination of several different means depends...	Add commas – The choice of an appropriate compliance means, or combination of several different means, depends...	Commas added.
Paragraph	AIR-500	Missing period.	Place a period after the	Corrected.

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24, Page 51			term “compliance” in the title.	
Paragraph 24a. Page 51	ASW-112	Word likes it better if it is written in the active voice.		Rewritten to active voice.
Paragraph 24a(1)(g), Page 51	ASW-112	Suggest finding a more relevant example. A window design is more of a structural issue?		Inserted new example.
Paragraph 24a, (1-8), Pages 51-57	Cathy Swider, AIR-120	Items are mislabeled. Should all five general means of compliance have introductions?	Order should be (1) Statement of Similarity <i>introduction?</i> (2) (a) Drawings (b) Configuration Description (c) Design Philosophy (3) Calculation and Analysis - <i>introduction?</i> (4) Evaluations (5) Tests	Put into AC format.
Paragraph 24, Pages 51-57	AIR-500	Clarity.	These pages (51 -57) should be figures or tables. In reality, the table doesn't seem necessary and the AC format for paragraphs could easily be adhered to.	Put into AC format.
Paragraph 24a(1)(g), Page 51	Paul Bernado, ANM-111		I suggest choosing another example instead of 25.773 to illustrate compliance by similarity since 25.773 explicitly requires flight test. Recommend replacing the current example with the following:	Used Paul's example.

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			“If the cursor control device in a new airplane is identical in design to that in an existing airplane, a statement of similarity may be an acceptable way to show compliance with § 25.1555(a).	
Paragraph 24a(1), Page 51	AIR-500	Improper capitalization.	Remove the capitalization from the term “similarity”.	Corrected.
Paragraph 24a(2) and (4), Page 52	AIR-500	Improper capitalization.	Remove the capitalization from the term “description”.	Corrected.
Paragraph 24a(5), Page 53	AIR-500	Improper capitalization.	Remove the capitalization from the term “philosophy”.	Corrected.
Paragraph 24a(6), Page 53	AIR-500	Improper capitalization.	Remove the capitalization from the term “analysis”.	Corrected.
Paragraph 24a(8)(e), under the conformity, Page 56	AIR-500	Add wording.	Rewrite to read: The facility me be conformed per the 14 CFR § 60.13.	Corrected.