

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

Proposed Change to **AC 29-2 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	Clarity. Missing required pages and formatting.	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.	Missing period. Inconsistent with the rest of the document.	Place a period after the paragraph title “Background”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-1, para a.(2), 3 rd sentence	Unnecessary underline.	Remove the underline from the TSO title “Helicopter Terrain Awareness”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-1, para a.(2), Note Section	Improper capitalization.	Remove the capitalization from the title “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	Adopted; change made.
ACE-ATL- ACO-119 ^a R. Chupka	Pg MG 18-2, 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.
AIR-500, A. Garrett	Pg MG 18-2, 2 nd unidentified para	Missing paragraph identifier.	Label the unidentified paragraph that begins with “AC 29-2” with a letter or number for the proper format and reference purposes.	Adopted; change made.
ANM-130S John Hill	Pg MG 18-2 (1) Regulate	Include 29.1431.	Critical Environment conditions need to be considered.	Adopted: added 29.1431; previously DO-160 for comprehensive environmental testing

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AIR-500, A. Garrett	Pg MG 18-2, para c.(1), Table	Missing labeling of table.	The table is not necessary; however, if you decide to keep the table, and then make sure you label it for referencing purposes.	Not adopted; the sub-paragraph headings are sufficient to identify the table contents.
AIR-500, A. Garrett	Pg MG 18-3, Table at top	Missing labeling of table.	The table is not necessary; however, if you decide to keep the table, and then make sure you label it for referencing purposes.	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 th line on chart	Missing period. Inconsistent with the rest of the document.	Place a period after the term “Environment”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-3, para c.(2), 6 th line on chart	Typo.	Remove the quotation mark found after the term “Equipment”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-3, para c.(3)(i)	Improper usage of semicolon. Delete the semicolon after the zip code “20036-4001”.	Replace with a period.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-3, para c.(3)(i), Table	Missing labeling of table.	The table is not necessary; however, if you decide to keep the table, and then make sure you label it for referencing purposes.	Not adopted; the sub-paragraph headings are sufficient to identify the table contents.
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.
ANM-130S John Hill	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.
ANM-130S John Hill	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.

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AIR-500, A. Garrett	Pg MG 18-4, para c.(3), 6 th line on chart	Missing period. Inconsistent with the rest of the document.	Place a period after the term “Equipment”.	Adopted; change made.
ANM-100D DACO- Carlson	Pg MG 18-4, para c.(3)(ii)	SAE ARP 4754 is the old revision.	Should be SAE ARP 4754A.	Adopted; change made.
ACE-ATL- ACO-119 ^a R. Chupka	Pg MG 18-4, 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.
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 Par (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. and unidentified paragraph	Incorrect formatting and missing paragraph identifier.	Re-label paragraph e to read: e. System Description. (1) The HTAWS will assist... (2) flight evaluations of system...	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-5, para f.	Incorrect format.	Move paragraph f to 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 st sentence	Improper capitalization.	Remove the capitalization from the following terms: “type certification, amended type certification, and supplemental type certification”.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-6, para f.(1), 1 st sentence	Incorrect usage of acronyms. The acronym “TC” stands for “type certificate” not “type certification”.	Delete the following acronyms: “TC, ATC, and STC”.	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.	Missing period.	Place a period after the term “installation”.	Adopted; change made.

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AIR-500, A. Garrett	Pg MG 18-6, para g.(1), 1 st sentence	Add wording.	Rewrite to read: For first time approvals, the applicant should provide a detailed system description and design features...	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 1 st sentence	The term “functional hazard assessment” has already been defined.	Use the acronym “FHA” after the first usage.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 1 st sentence	Improper capitalization.	Remove the capitalization from the term/title “System Safety Assessment”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 4 th sentence	Add wording.	Rewrite to read: ...do not require HTAWS, is assigned the failure condition classification of minor.	Noted; however, hazard classifications for different operational requirements were removed.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2), 5 th sentence	Add wording.	Rewrite to read: ...rules that do require HTAWS, is assigned the failure condition classification of major by the TSO-C194.	Noted; however, hazard classification for different operational requirements was removed.
AIR-500, A. Garrett	Pg MG 18-6, para g.(2)(i)	Unnecessary wording.	Remove the text found the parenthesis title “System Description”.	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	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>(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>	<p>Noted; hazard classifications for different operational requirements were removed.</p>

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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.	Noted; hazard classifications for different operational requirements were removed..
ANM-100D DACO- Carlson	Pg MG 18-7, para 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>	Noted; hazard classifications for different operational requirements were removed.
ANM-100D DACO- Carlson	Pg MG 18-7, para 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.

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ACE-ATL- ACO-119 ^a 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.
AIR-40 Hal Jensen	Pg 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 in lieu of DO-178.</i>	Adopted; change made.
AIR-500, A. Garrett	Pg 18-7, para g.(3), last sentence	Change wording.	Rewrite to read: Couples with this are the evasive maneuvers that will be employed to avoid terrain and obstacles.	Noted; however, this sentence was deleted.

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AIR-40 Hal Jensen	Pg MG 18-7, para g.(4) Environmental Qualification	<p>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.</p> <p>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>.</p>	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).
AIR-500, A. Garrett	Pg MG 18-7, para g.(4), 6 th sentence	Clarity.	What do these acronyms “TC, ATC, or STC” mean? It does not mean “type certificate, amended type certificate, or supplemental type certificate”, and then have to spell the terms out completely.	Adopted; changes made.

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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; sentence added to reference appropriate paragraph in DO-309 for performance evaluation.
AIR-500, A. Garrett	Pg MG 18-8, para h.	Delete the colon. Inconsistent with the rest of the text.	Underline the title “Installation Considerations” and place a period after the title.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-9, para i. & j.	Missing underline from paragraph title. Inconsistent with the rest of the text.	Underline both paragraph titles “Ground Test Considerations” and “Flight Test Considerations”.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-9, para i.(1)(v)	Suggestion.	Make sure you have defined each acronym before you use them.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-10, para j.(2)	Improper capitalization.	Remove the capitalization from term/title “terrain and obstacle display”.	Adopted; changes 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.	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 paragraph title. Inconsistent with the rest of the document	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., 1 st and 2 nd sentences	Missing space.	There should be two spaces between sentences.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k., 2 nd and 3 rd sentences	Missing space.	There should be two spaces between sentences.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-11, para k., Note Section, 1 st sentence	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., Note Section, 2 nd sentence	Improper capitalization.	Remove the capitalization from the term “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 obstacles database”.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(1)(iii)	Improper capitalization.	Remove the capitalization from the term/title “protection mode” and “approach procedures or other special procedures”.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(i)	Improper capitalization.	Remove the capitalization from the term/title “caution alert”.	Adopted; changes made.
AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(ii)	Improper capitalization.	Remove the capitalization from the term/title “warning alert”.	Adopted; changes made.

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AIR-500, A. Garrett	Pg MG 18-11, para k.(2)(iii)	Change wording.	Rewrite to read: inhibit. For those installations that include the ability to inhibit all or some of the HTAWS audio alerts, the RFM or RFMS should state:	Adopted; changes 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 letter.	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), 2nd bullet	Delete the question mark after the term “inhibited”. Inconsistent with the rest of the document.	Replace with a period.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-12, para l.	Missing underline from paragraph title.	Underline the paragraph title “Instructions for Continued Airworthiness”.	Adopted; change made.
AIR-500, A. Garrett	Pg MG 18-12, para l., 1 st sentence	The term “Instructions for Continued Airworthiness” has already been defined.	Use the acronym “ICAs”.	Adopted; change made.
ACE-117C (mep)	Pg MG 18-12, para l.	References part 27, Appendix A.	Correct to reference part 29, Appendix A.	Adopted; change made.
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.