

**DISPOSITION OF PUBLIC COMMENTS**  
**AC 25.1329-1C, Approval of Flight Guidance Systems**  
**Prepared by Gregg Bartley, ANM-111**

No.	Comment	Requested Change	Disposition
<b>Commenter: Boeing</b>			
1	<p>Table 5-1, “Examples of Normal Conditions” page 48 in draft AC 25.1329-1B (Change 1)</p> <p>Proposed text in Table 5-1, Icing section, states:</p> <p><i>“All icing conditions covered by 14 CFR part 25, Appendix C and applicable icing conditions covered by 14 CFR part 25, Appendix X, with the exception of ‘asymmetric icing’ discussed under ‘Rare Normal Conditions’ in Table 5-2.”</i></p>	<p>Change “Appendix X” to <u>“Appendix O”</u>.</p> <p>The reference to “Appendix X” must be changed to “Appendix O” in accordance with FAA’s Notice of Proposed Rulemaking, “Airplane and Engine Certification Requirements in Supercooled Large Drop, Mixed Phase, and Ice Crystal Icing Conditions” (Notice No. 10-10; Docket No. FAA-2010-0636).</p>	<p>Comment accepted.</p>

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2	<p>Table 5-1, “Examples of Normal Conditions” page 48 in draft AC 25.1329-1B (Change 1)</p> <p style="text-align: center;">and</p> <p>Table 5-2, “Examples of Rare Normal Conditions” (page 51 in current AC 25.1329-1B)</p> <p>Proposed text in Table 5-1, Icing section, states:</p> <p style="padding-left: 40px;"><i>“All icing conditions covered by 14 CFR part 25, Appendix C and applicable icing conditions covered by 14 CFR part 25, Appendix X, with the exception of ‘asymmetric icing’ discussed under ‘Rare Normal Conditions’ in Table 5-2.”</i></p>	<p>Restore the original Icing text to Table 5-1, “Examples of Normal Conditions.”</p> <p>The Supercooled Large Drop icing conditions listed in Appendix O should be classified as “rare normal conditions” due to their low frequency of occurrence. The Ice Protection Harmonization Working Group Report indicates that encounters with the Appendix O conditions are infrequent (approximately 1-in-100 to 1-in-1000, on average, in all worldwide icing encounters). It was never the intention of the Flight Guidance System Harmonization Working Group to classify such infrequent icing environments as “Normal Conditions.”</p> <p>Move the reference to the new Part 25, Appendix O, “Supercooled Large Drop Icing Conditions,” to Table 5-2, “Examples of Rare Normal Conditions.”</p> <p>Accordingly, the Icing text of Table 5-1 would once again state:</p> <p style="padding-left: 40px;"><i>“All icing conditions</i></p>	Comment accepted.

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		<p data-bbox="835 381 1199 597"><i>covered by 14 CFR Part 25, Appendix C, with the exception of “asymmetric icing” discussed under “Rare Normal Conditions” in Table 5-2.”</i></p> <p data-bbox="783 638 1276 703">The new Icing text of Table 5-2 would state:</p> <p data-bbox="783 748 1262 813"><i>“Applicable icing conditions covered by 14 CFR Part 25, <b><u>Appendix O.</u></b>”</i></p>	

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1	<p>Table 5-1 (Normal Conditions) Icing</p> <p>All icing conditions covered by 14 CFR 25 part 25, Appendix C and applicable icing conditions covered by 14 CFR part 25, Appendix X, with the exception of "asymmetric icing" discussed under "Rare Normal Conditions" in Table 5-2.</p> <p>Table 5-2 (Rare Normal Conditions)</p> <p>Asymmetric Icing Icing conditions that result in ice accumulations that causes the FGS, if engaged, to counter the aerodynamic effect of icing conditions with a sustained pitch, roll, or yaw command that approaches its maximum authority.</p>	<p>Table 5-1 (Normal Conditions) Icing</p> <p>All icing conditions covered by 14 CFR 25 part 25, Appendix C and the portions of 14 CFR part 25, Appendix O that are approved per 14 CFR part 25.1420(a)(2) or (a)(3) applicable icing conditions covered by 14 CFR part 25, Appendix X, with the exception of "asymmetric icing" discussed under "Rare Normal Conditions" in Table 5-2.</p> <p>Table 5-2 (Rare Normal Conditions) Asymmetric Icing</p> <p>a. All icing conditions that are prohibited by limitations under 14 CFR part 25.1420(a)(1) or (a)(2). Such icing exposures will be limited to detection and exit from all icing conditions.</p> <p>b. Icing conditions that result in ice accumulations that causes the FGS, if engaged, to counter the aerodynamic effect of icing conditions with a sustained pitch, roll, or yaw command that approaches its maximum authority.</p> <p>The proposed rule §25.1420 allows the option of prohibiting operations in all or a portion of the large drop conditions</p>	<p>Comment accepted in principle. Actually, the Boeing proposed revision (discussed above) was accepted. That comment went further than this comment by AIA/GAMA. Therefore, the concern expressed in this comment has been addressed by incorporation of the Boeing comment.</p>

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		<p>(14 CFR 25, Appendix O). With these limitations, these types of aircraft are limited to inadvertent encounters with a subsequent exit from all icing conditions. In addition, in the draft AC 25-XX, section 5.f(2)(c), the average probability of encountering Appendix O conditions is defined as 1E-2., which limits the exposure to such conditions.</p> <p>Given that the conditions will be prohibited by limitation and the relatively low probability of SLD conditions, it is recommend that the unapproved portions of the large droplet environment be treated as a rare normal occurrence as defined in table 5-2. Any approved portions of the Appendix O environment are recommended to be treated as normal conditions for that aircraft as defined in table 5-1.</p>	