

	AVS Quality Management System	QPM # AIR-001-007-F1	Revision 0
		Title: Document Review Log	Date: June 28, 2012

1. Document No.: AC 20-24D, Approval of Propulsion Fuels and Lubricating Oils	2. Project Manager: Mark Rumizen	3. Reviewing Office: Reviewer's Name & phone #: David Parmenter, Airbus +441179360684	4. Date of Review: 28/08/2013	5. Date of Disposition:
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REVISION HISTORY

Rev	Description of Change	Effective Date
0	Original	6/19/09

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Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by project manager prior to sending out for comments.

Blocks 3 & 4: To be completed by reviewing office. Enter office symbol, reviewers name and phone number.

Block 5: To be completed by project manager after receiving comments from reviewing office. Enter date of disposition.

The below columns are to be completed by the reviewing office, except for the “Disposition” column.

Project manager’s disposition in comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as:

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

Item No:	Page and Paragraph No:	Comment: AIRBUS	Reason:	Recommendation:	Disposition:
1.	5(b). Page 3	The Reference 8 for ASTM D4054 is incorrect.	Incorrect	Change “Guideline for the Qualification and Approval of New Aviation Turbine Fuels and Fuel Additives” to “Standard Practice for Qualification and Approval of New Aviation Turbine Fuels and Fuel Additives”	Adopted.
2.	5(b). Page 4	References to documents mentioned later in the document should be added: MIL-DTL-5624, MIL-DTL-83133, MIL-HDBK-510-1, DS 91-86 & DS 91-87	Incomplete	Add references to these specifications and change title of paragraph to ‘Other Guidance’	Adopted.

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3.	5(b). Page 4	CRC 635 is about to be updated.		Change CRC 635 to CRC 663 if this AC is released after CRC663 publication.	Non-concur. CRC 663 has not yet been published.
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4.	7(e.), 7(f.) (2) and 8(e.)	<p>These paragraphs introduce a fundamental change in the airworthiness approval process for incorporating fuel as an operating limitation for a given airframe or engine application. With this proposal, the FAA will allow to deviate from the well established and controlled approval process using industry or governmental standards. Airbus fails to understand the true necessity to offer this possibility. On the contrary, Airbus can see many risks in not using controlled standards established by government or industry bodies independent from the applicant seeking approval of a fuel. The guidelines delineated further in the AC in paragraph 8.e are very general and it is difficult to precisely understand with only these guidelines how the ‘independent specification’ route will provide an equivalent level of safety to the traditional government/industry standard route.</p>	<p>Continued safety EASA/FAA Harmonization Additional burden on OEM</p>	<p>Remove the concerned paragraphs and the associated option to rely on ‘independent’ specification not issued by an industry/government body</p>	<p>Non-concur. FAA regulatory procedures prohibit the FAA from proscribing specific means of compliance to specific requirements. We are required to accommodate alternative means of compliance to specific regulations if proposed by industry.</p>
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5.	7(e.), 7(f.) (2) and 8(e.) cont'd	<p>With this proposal the FAA also introduces the risk to transfer a great deal of the approval work performed in the frame of the industry/govt bodies to a single or a couple of OEMs who will not benefit from the same amount of resources and expertise as available in the standardization bodies.</p> <p>Airbus further notes EASA did not include similar provisions in the recently published EASA Certification Memorandum EASA CM – PIFS – 009. The FAA proposal therefore creates significant dis-harmonization between the two major airworthiness regulators on a sensitive topic</p>	Continued safety EASA/FAA Harmonization Additional burden on OEM	<p>Remove the concerned paragraphs and the associated option to rely on ‘independent’ specification not issued by an industry/government body</p> <p>If the FAA chooses to maintain the paragraph, Airbus believes that the cross-reference to § 8.c of the AC in § 7e. and 7f.(2) is incorrect and should be replaced by § 8.e</p>	<p>Non-concur (see item 4 above).</p> <p>Adopted. Reference to 8.c. changed to 8.e.</p>
6.	8(a.) (3) (c) Page 7	Reference to GOST 10227 should be changed.	GOST 10227 isn't clear, could mean GOST 10227-62 (which is obsolete and doesn't contain RT) or GOST 10227-86.	Append -86 to GOST 10227.	Non-concur. Revision level suffixes not included for any specification references because this would require updating the AC for each new spec revision. “Current version” is assumed.

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7.	8.(c.)(2)(a) Page 9	This paragraph can be interpreted as meaning the inclusion of a new additive is a ‘minor’ change to the specification. The FAA should confirm this interpretation. The inadvertent use of such an additive may render the fuel not fit for purpose on a given airframe/engine combination.		Provide clarification	Non-concur. The paragraph does not specifically refer to additives and inadvertent use of an additive approved for the specification would not impact the fit-for-purpose of the fuel.
8.	8.(c.)(2)(b)(1) Page 9	Incorrect title for ASTM D4054		Change “Guideline for the Qualification and Approval of New Aviation Turbine Fuels and Fuel Additives” to “Standard Practice for Qualification and Approval of New Aviation Turbine Fuels and Fuel Additives”	Adopted.
9.	8.(e)(4) Page 11	Needs clarification	The Additives section seems unclear – does it relate to the approval of a current or new additive in an independent specification?	Clarify if paragraph is maintained	Adopted. Wording clarified to “ Additives permitted for use in independent specifications must identify additives...”.

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10.	8.(e)(4) Page 11	Assurance that any additives present can be identified	A statement outlining that a means of detecting additives in fuel produced to the independent specification must be defined, i.e. test methods for detecting additives in other specifications must work with the proposed fuel, or a new method is defined that is proven to be efficient.		Adopted.
11.	8(f)(2) Page 12	Clarification	Paragraph 8.c. refers to ASTM specifications only, but includes military and independent specifications as well.	Clarify so that 8d, e and f are referenced as well.	Adopted.
12.	8(f)(6)(b) Page 13	Use of the term ‘weathering’	The term ‘weathering’ refers to fuel stability over time in this paragraph. From an airframe perspective this term is used to describe outgassing of dissolved gasses at altitude from fuel, and may lead to confusion.	Omit the term ‘weathering’	Adopted.