

DISPOSITION OF PUBLIC COMMENTS
AC 25.795, Chemical Oxygen Security Standards
Prepared by: Jeff Gradlin, ANM-115

	Commenter	Requested Change	Disposition
1.	Antonio Parente - Agência Nacional de Aviação Civil (ANAC)	Section 6.c: as written in the chemical oxygen generator (COG) NPRM, the active tamper-evident features shall not be susceptible to tampering. This guidance is missing in the proposed AC and should be included.	Agree. We added paragraph 6.c.(3) to the AC to include this guidance.
2.	Antonio Parente - ANAC	According to section 3, “immediately obvious” would be applicable to “observable” locations. Also, the definition of “observable” refers to crew members. Therefore, question 2 in Figure 1 should be deleted; question 3 being enough.	As noted by another commenter, question 3 is more directly associated with tamper evidence, rather than “immediately obvious.” We revised the flow chart to clarify this point.
3.	Antonio Parente - ANAC	Figure 1: for a proposed design that employs both tamper resistant and evident approaches, the answer to question 4 may be “YES” depending on how this question is interpreted. Assuming that answering “NO” refers to a fully tamper resistant design (compliant to § 25.795(d)(1)), there should be another question in case the answer is “YES” to evaluate the tamper evident features. However, if answering “NO” means that not only tamper resistant features were evaluated but also tamper evident, then question 4 needs to be rewritten to avoid confusion and the notes on Table 1 related to question 4 must include the evaluation of tamper evident features. In other words, a design that combines tamper resistant and tamper evident features would always fall into the “Change the COG installation design,” depending on the interpretation of question #4.	Agree. We revised the figure in response to this and the previous comment.
4.	Antonio Parente - ANAC	Section 7: the definition of “immediately obvious” mentions “areas where OCCUPANTS are always present.” However, section 3 defines such “immediately obvious” locations as those that can be seen by a CREWMEMBER. It must be left clear if passengers can be relied upon or not for identification of a tampering attempt and revise section 3 or 7 in order to harmonize them.	We assume that any area that can be seen by passengers can also be seen by crew. The central distinction being that given the difference in numbers of crew versus number of passengers, crew might not be viewing any given location all the time. The intent is that areas in view of passengers can be considered immediately obvious, recognizing that the crew can also view the area.

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5.	Antonio Parente - ANAC	<p>According to section 7, there is no need for tamper resistance for COG installations located where any attempt at tampering would be immediately obvious. This is incoherent with the notes in Table 1 for question 3 and may lead to confusion, since such notes are related to tamper resistant and tamper evident features. Proposal is to replace the Table 1 notes currently listed for question 3 by notes more related to the “immediately obvious” definition.</p> <p>This would also make the table more coherent with the proposed rule itself, that clearly separates the immediately obvious approach from the tamper resistant and tamper evident ones.</p>	<p>Table 1 is an aid for evaluating installations. Not all the items will apply in all cases. The rule is clear that one method is to locate the COG where any attempt at access is immediately obvious.</p> <p>We changed paragraph 7 to state “any attempt to <u>tampering access</u>” to be consistent.</p>
6.	Association of Flight Attendants (AFA)	In paragraph 6.b.(2) it should be noted that rendering the COG inaccessible could have negative impact on access for maintenance.	Agree. We added a sentence to paragraph 6.b.(2) to include the ramifications on maintenance.
7.	Association of Flight Attendants	In paragraph 6.c.(2) AFA fully supports the discussion of crew training, encourages FAA to ensure adequate training programs are developed should a tamper-evident approach be used.	No change required.
8.	Association of Flight Attendants	AFA recommends that crew training procedures also be discussed in paragraph 7, which applies to installations where an attempt to access would be immediately obvious. AFA notes that the crew should be familiar with all potential security issues, including how to deal with the aftermath.	Part of this comment is beyond the scope of this AC, and is applicable as a general matter to operational training. However, a mention of crew awareness and training is noted since the subject has been discussed at high level already. We did not change the AC in regard to this comment.
9.	Association of Flight Attendants	Paragraph 5.c. has a typographical error in the reference to § 25.1447.	Corrected from § 25.2447 to 25.1447.

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10.	Boeing Commercial Airplanes	<p>Boeing recommends that the AC be revised to align with the final recommendation of the Lavatory Oxygen Aviation Rulemaking Committee (LOARC). That is, the AC should apply only to the lavatory chemical oxygen generator installations.</p> <p>Our primary concern with the proposed AC is that the scope extends beyond the final LOARC recommendation, which was to address COGs in lavatories. While the LOARC considered other areas of the airplane, the final recommendation was directed towards lavatory oxygen only.</p>	<p>The LOARC final recommendation included all installations of COGs. The FAA's retrofit action via airworthiness directive only applied to lavatories because the COG installations in the lavatories were the only identified unsafe condition.</p> <p>However, the LOARC concluded that if the same characteristics exist on other installations as they did for lavatories, the same criteria should apply.</p> <p>No change to the AC.</p>