

DISPOSITION OF FAA COMMENTS

AC 25-32, Approval of Landing Performance Data for Time-of-Arrival Landing Performance Assessments

Prepared by Don Stimson and Joe Jacobsen, ANM-111

No.			
	Commenter: R. McElroy, ACE-117C		
1.	Subject title and reference to “Time of Arrival” Landing Performance Assessment is not a common industry label.	Consider change of title and subsequent references simply to “Contaminated Runway” Landing Performance. Industry operators and manufacturers will recognize that subject title as consistent with pre-existing data available for some operators.	The document covers more than just contaminated runway landing performance. It is part of the plan to implement the recommendations from the Takeoff and Landing Performance Assessment (TALPA) Aviation Rulemaking Committee (ARC) recommendations on a non-rulemaking basis. If “time of arrival” landing performance assessment is not currently part of the common industry vernacular, it soon will be.
2.	Page 5 6. DEFINITIONS, Runway Condition Code seems to be a “new” term for the industry. Is there a reason for the new term? How/who will use it?		Runway condition code has been an ICAO standard for many years. It has not commonly been used in the U.S., but will be used extensively after implementation of the TALPA ARC recommendation concepts. Airports personnel will assign a runway condition code that will be reported via NOTAM and ATC to pilots and operators. Pilots will use the runway condition code as part of the before-landing performance assessment process.
3.	Paragraphs 8.4.4 and 8.4.7: What is the source reference for the calculations included? There is no reference to “7 seconds at a speed of 98 percent of the recommended speed...” in AC-7C.		The air distance specified in the draft AC represents the consensus of the participants on the TALPA ARC and was included in their recommendations. This method for determining an operational air distance was first used in AC 121.195-1A. The TALPA ARC deliberations on this issue included reviews of operational landing distance data.

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No.	Comment	Requested Change	Disposition
Commenter: R. McElroy, ACE-117C			
4.	How is currently approved landing performance data by the manufacturer different from the data obtained through this proposed AC?	The differences need to be listed and explained.	Any differences between the currently approved landing performance data in a manufacturer’s AFM and the data developed in accordance with this AC depends on how the manufacturer developed the data in the AFM. This point is made in paragraph 5.3 of the AC. Other than accounting for the effects of runway contamination, the primary area of potential difference is in the air distance. This point is covered in paragraph 8.2.2.

No.			
Commenter: M. Ward, ACE-117C			
1.	Paragraph 8.4.1 makes reference to paragraph 19.2.3 in AC 25-7D; however, AC 25-7 is currently at ‘C’ and doesn’t use that paragraph numbering scheme.		AC 25-7D is currently out for comment concurrently with this AC. We will make sure the reference is correct in the final version of this AC, which will depend on whether AC 25-7D is issued before this AC.
2.	Paragraph 12.2 discusses approved data and data not approved. How can landing distance data be authorized for use but not FAA approved? The title of the AC is “Approval of Landing Performance.”	Please clarify the intended outcome of the data developed under this AC.	Operational use of this data will be addressed in the applicable operational guidance. Without a regulatory requirement for this data, we cannot require the data to be submitted for approval. There is plenty of precedence of data that is used in operations, but does not receive certification approval. Fuel burn data is one example.

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No.			
	Commenter: Roell, ACE-117W		
1.	Page 9 - Figure 1 and Section 8.4.4— V_{APP} is not typically used as the recommended speed over the landing threshold. V_{APP} is usually some increment above V_{REF} .	Define a new “V-speed” for the recommended speed over the landing threshold, or replace “ V_{APP} ” with “final approach speed” throughout the document.	The commenter has not provided any evidence for a reason to define a V-speed different than V_{APP} . V_{APP} is expected to be a speed higher than V_{REF} , so it is unclear where any conflict may arise. Since V_{APP} is defined as the final approach speed, it is consistent with the change recommended by the commenter. This definition recognizes that pilots are likely to carry the final approach speed to the threshold.
2.	Page 12 - Figure 2 lists a Runway Surface Condition Description of: “Warmer than 15° C outside air temperature <ul style="list-style-type: none"> • Compacted Snow” I suspect the temperature should be -15° C.	Change Runway Surface Condition Description to: “Warmer than -15° C outside air temperature <ul style="list-style-type: none"> • Compacted Snow” 	This typo has been fixed.
3.	Sections 11.4 – 11.7 appear to be sub-sections to Section 11.3.	Renumber Sections 11.4 – 11.7 to 11.3.1 – 11.3.4, and renumber Section 11.8 to 11.5.	The commenter is correct. This has been fixed.

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No.			
Commenter: John Hed and Steve O’Neal, ANM-160S			
1.	Page 1, paragraph 1. The Note appears to just duplicate the last sentence of the paragraph.	Delete Note.	The note has been deleted. The text in the paragraph has been re-worded for clarity in response to a different comment.
2.	Page 14, paragraph 10.5. There may be conditions where during a landing on very low friction surfaces in a crosswind, the aircraft would actually be in a sliding crab to stay on the runway. In this case, use of thrust reversers could actually be a detriment, causing a runway departure. Also we should suggest, that due to the first sentence (and maybe the added recommended sentence to the right) that the operator may want to reduce their maximum crosswinds allowed during operations on contaminated runways.	Suggest an added second sentence to paragraph 10.5 such as: “Thrust reverser use may even be detrimental for directional control in some cases due to crosswinds and low friction conditions. Followed by: “Due to these described deficiencies, the operator may want to consider reducing their operational crosswind limit when operating on contaminated runways.”	Text similar to that requested has been added to address this comment.
3.	Page 16, paragraph 11.3. EASA has been defined earlier so you can use the acronym.	Change “European...” to EASA	Change adopted.
4.	Page 17, paragraph 12.3.3. There may be other limitations than the one listed.	Suggest change to: “All operational limitations associated with landing on contaminated runways (e.g., max contamination depth, crosswind limit, etc.) should be published in the AFM”	To address this comment, the following paragraph has been added: “12.3.4. Any other limitations associated with use of the landing performance data.”

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No.			
Commenter: MAS, ASW-111			
1.	Item 1 Purpose – Concern in that since there is no regulatory requirement (Part 25) certification, there is no validation methodology used in confirming the data presented and then used by 121 operators? What about smaller Part 25 (Gulfstream, Cessna, Learjet and Part 125/135 aircraft)?	<p>Closed Loop Substantiation of the Performance Data Presented.</p> <p>Clarification as to whom this is targeted as (Part 121, Part 125) Operations or operations where an Ops Spec is used.</p> <p>Not suggested for Part 25, Part 91 Operations</p>	This is a part 25 AC and as such does not address the acceptability of data used by operators. That issue will be addressed by appropriate operational guidance such as Operations Specifications, Management Specifications, and/or an AC applicable to operators.
2.	Section 2 – Applicability	Since there is no regulatory requirement, is an AC the proper vehicle for detailing this information? I don't have an alternative other than a job aid or some other information vehicle.	An AC appears to be the best vehicle for making this information available to a wide audience. Not all ACs correspond to a specific regulatory requirement.

No.	Comment	Requested Change	Disposition
Commenter: AIR-040			
1.	Paragraph 5.2. End of first sentence is missing a period.		Fixed.

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No.	Comment	Requested Change	Disposition
Commenter: AIR-040			
2.	Whole document: Uses “feet” and “ft/sec.” Should a metric equivalent be provided?		The references to ft/sec are in terms of a descent rate, which in aviation is generally still given in these terms. The references to “feet” are in terms of the height above the runway surface at which the landing distance starts, which is specified in terms of feet in 14 CFR 25.125. (One of the usages of “feet” is in terms of the length of runway that fails a friction test. This usage is consistent with the applicable Airports AC guidance. We will coordinate with Airports about potentially adding a reference to this length in meters.
3.	Paragraph 8.4.7. Last parenthetical. Remove extra space.		Fixed.
4.	Paragraph 9.1. Sentence rewrite suggestion.	<p><u>Current:</u> “Because the contaminant drag increases with depth, the deeper the contaminant, the shorter the stopping distance.”</p> <p><u>Suggested Change:</u> “Because drag increases with contaminant depth, the deeper the contaminant is the shorter the stopping distance will be.”</p>	Accepted.
5.	Paragraph 9.4. This references EASA as having an acceptable means of calculating contaminant drag. Are there similar guidance/regulations from other State organizations/agencies that also provide an acceptable means of calculating contaminant drag?		The referenced EASA guidance is the only method we will currently accept.

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No.	Comment	Requested Change	Disposition
Commenter: AIR-040			
6.	Paragraph 11.2. Sentence rewrite suggestion.	<p><u>Current:</u> “In lieu of providing data in terms of both runway surface conditions and pilot reported braking actions, it is acceptable to provide the data in terms of either runway surface conditions description or pilot reported braking actions.”</p> <p><u>Suggested Change:</u> “Although it is preferred to have both runway surface conditions and pilot reported braking actions available, it is acceptable to provide only one of these.”</p>	<p>The sentence has been rewritten close to what the commenter suggested. It now states:</p> <p>“Although it is preferred to have the data presented in terms of both runway surface conditions and pilot-reported braking actions, it is acceptable to provide the data in terms of only one of these.”</p>
7.	Paragraph 11.3. This references both JAA and EASA as having an acceptable contaminated runway type certification or operating requirements. Are there similar guidance/regulations from other State organizations/agencies that also provide an acceptable means?		The referenced EASA guidance is the only method we will currently accept.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	Cover page, Date	The "Date:" should be the signature date.	Per template	Keep this blank until the AC is signed, and then insert the signature date.	Agree. Change made.
2.	Cover page	The cover page needs a reference to the feedback form.	As per the guidance from AIR-501	Add reference in the introduction to the feedback form.	Agree. Change made.
3.	Cover page	The AC template calls for the signature block on the cover page to be 5 lines under last sentence.	Per template	Move signature block up to be 5 lines under the last sentence of the cover page.	Agree with the guidance, but removed the signature block since it should only be added before final issuance. It should not be included when the AC is submitted for internal FAA or public comment.
4.	Cover page	Jeffrey Duven is no longer Acting Manager.		Update signature block by removing "Acting".	No longer applicable. See comment 3.
5.	Page ii, Table of Contents	The Table of Contents (TOC) does not follow the template in the following area: There are too many spaces between "Paragraph" and page, headers and the start of the content.	Per template	Reduce the spacing gap as per the template.	Agree. Changed the TOC to comply with the AC template.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
6.	Page ii, Table of Contents	The TOC does not follow the template in the following area: The lines between paragraph titles and the page numbers should not be solid lines.	Per template	Replace the solid lines with dotted lines.	See comment 5.
7.	Page ii, Table of Contents	The TOC does not follow the template in the following area: The paragraph numbering and titles should not be bold.	Per template	In the TOC, use bold font only for paragraph and page headers.	See comment 5.
8.	Page ii, Table of Contents	The TOC does not follow the template in the following area: The page numbers should not be bold.	Per template	Use regular font for the page numbers.	See comment 5.
9.	Page ii, Table of Contents	The TOC does not follow the template in the following area: The margin alignment between Heading 1 and Heading 2 listings does not follow the template.	Per template	Follow the template's guidance for alignment. For example, 8.4 and 8.5 should align with the "D" in the word "Determination" in 8. Also, the second line of a title should be indented.(see8/9)	See comment 5.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
10.	Page ii, Table of Contents	The TOC does not follow the template in the following area: All Heading 1 titles should align (10-12 don't align with 1-8).	Per template	Reformat to ensure that all Heading 1 titles align with each other under the first title: "Purpose."	See comment 5.
11.	Page ii, Table of Contents	There are several significant words in the paragraph titles that should be capitalized. Note: if the MS Styles auto-TOC generator is used, then be sure to change these words in the AC text itself, which will then be updated when displayed in the TOC.	Consistent formatting	Please capitalize the following words: 7. Performance 9. Drag Loose Contaminants 10. Reverse Thrust 11. Existing Type Design 12.1 Location 12.2 Status 12.3 Provided Landing Performance Data	Agree. Change made.
12.	Page ii, Table of Contents - Figures	The header "Figure" should be "Figures" and should be centered and in bold. The words and page numbers under "Figures" should not be in bold.	Per template	Add an "s" to "Figure" and then center the word in bold above this section. Also, use normal font , no bold for the words and page numbers under "Figures".	Agree. Change made.

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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
13.	Page ii, Table of Contents	A header for the "Appendices" section should be added, and the word should be centered and in bold above this section.	Per template	Add the header "Appendices" above the reference to "Appendix A", making it bold and centered.	Disagree. The Feedback Form should be included as an attachment to the AC, not an appendix. Therefore, no appendix heading is needed.
14.	page ii, Table of Contents	The name of paragraph 3 is a bit awkward: "Code of Regulations...Regulations"	Clarity for reader	Consider changing the title of paragraph 3. Perhaps: "Related FAA Regulations" (be sure to make any changes to both the TOC and the heading title in the text).	Partially agree. Changed to "Related Regulations."
15.	Paragraph 1, page 1:	"(AC)" was already spelled out + acronym on the cover page, so both are not needed again here.	Acronym usage	Strike "advisory circular (AC)" and replace with "AC"	Disagree. The acronym is no longer defined on the cover page, so it needs to be defined on the first page of the AC.
16.	Paragraph 3.2	"(AC)" was already spelled out + acronym on the cover page, so both are not needed again here.	Acronym usage	Replace "Advisory Circulars" with "ACs" for this paragraph title.	Agree. Change made.

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17.	Paragraph 3.2, page 2 and universal:	Do not cite the most recent version of an AC that would become obsolete with updates to such ACs.	To keep text current	For AC 25-7D and all such references with the most current version cited, drop the "D" (or corresponding version indicator) and related dates.	Disagree. The latest version of the AC at the time of publication must be cited because guidance in previous ACs might no longer be accepted or applicable. Also, we added a statement to paragraph 3.2 that specifies the reader should refer to latest revision if the document is updated after publication of the AC.
18.	Paragraph 4.1	In the third line, the words "guidance information" are redundant.	Grammar	Please strike the word "information".	Agree. Change made.
19.	Paragraph 4.2	SAFO is defined above, and the full title of SAFO 06012 is spelled out above, so no need to repeat both here.	Acronym usage	Strike the full wording of SAFO and the full title such that the sentence reads: "...the FAA issued SAFO 06012, which urgently recommended that...."	Agree. Change made.

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20.	Paragraph 5.1, page 3	"Title 14, Code of Federal Regulations (14 CFR)" was already defined in 3.1, so not needed again here. Also, the sections listed on the first line are not "parts," so that word should not be used here.	Proper usage	Strike words and start the sentence with: "14 CFR 91.1037, 121.195,..."	Partially agree. Changed to "Sections 91.1037, 121.195...."
21.	Paragraph 6, page 5	The Table used is not a standard table, making the presentation of data here confusing. Also, the different column headings ("Term," "Subterm," and "Description") are also confusing in a table.	Ease of reading	Either use a standard table or format this information with numbers like the rest of the AC. The terms also need to be in alphabetical order.	Agree. Moved the definitions out of the table and numbered them according to the AC template.
22.	Paragraph 6, page 5	Subterm: Water -- this subterm's definition does not end with a period and the other definitions end with a period.	Consistent formatting	Add a period at the end of "Frozen water."	Agree. Change made.
23.	Paragraph 6, page 6	Under Subterm, the "Medium*-to-poor section, the asterisk should be moved up to the previous line in the "Description" column to be associated with the word "medium."	Clarity for reader	Move the asterisk up to be immediately behind the word "medium" in the "Description" column.	Agree. Change made.

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24.	Paragraph 6, page 6	Under the term "Slippery when wet," the acronym for "Advisory Circular" should be used.	Acronym usage	Replace "Advisory Circular 150/5320-12C" with "AC 150/5320-12C"	Agree. Change made.
25.	Paragraph 7.2.1, page 7	The information listed here should be labeled as a table	Consistent formatting	Please label as a table, with the label in bold and centered above the table.	Agree. Change made.
26.	Paragraph 7.2.2, page 7	The box labeled "Pilot Reported Braking Action" and the *Note under it are not needed.	The reference to the definitions on page 6 is sufficient.	Strike the box and the *Note and leave just the first line of 7.2.2.	Partially agree. Moved the information out of the table and into a bulleted list, but kept the note.
27.	Paragraph 7.3.7.1 and 7.3.7.2, page 8	Heading 4 paragraphs should not align with Heading 1-3 paragraphs. These two paragraphs must be indented to 1.5".	Per template.	Indent these two Heading 4 paragraphs to the template-prescribed 1.5" place.	Agree. Change made.
28.	Paragraph 7.3.7.2, page 8	This paragraph ends with a semi colon, but it should end with a period.	Proper punctuation	Please replace the semi colon at the end of this paragraph with a period.	Partially agree. For clarity, moved the paragraphs 7.2.7.1 and 7.2.7.2 directly into paragraph 7.2.7. Kept the semicolon.
29.	Paragraph 8.1, page 8	The label and title for Figure 1 should be in bold and located above the figure	Per template	Please move the title of Figure 1 to above the figure, centering its title and using bold.	Agree. Change made.

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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
30.	Paragraph 8.1, page 8	The terms used in the description in 8.1 of Figure 1 do not match completely. If there are just "three segments," can't the same term be used in 8.1 and then again in Figure 1?	Clarity for reader	Clarify, if needed: "airborne segment" vs. "air distance" "transition segment" vs. transition distance" "final stopping" vs. "full braking"	Disagree. The use of both terms are correct. Segment is the general term, and distance is specific term to be quantified. Industry uses both terms interchangeable; therefore, it is important to use both terms in the AC.
31.	Paragraph 8.4.1, page 9 & Universal. Also in 8.5.1 (p. 11)	In the first line, the reference to "Figure 1" should be in lower case.	Consistent formatting	Replace "Figure 1,..." with "figure 1,..."	Agree. Change made.
32.	Paragraph 8.4.1, page 9	The reference to specific paragraphs in another AC should be avoided.	To keep the text current	Strike "...as described in paragraph 19.2.3 of AC 25-7D,..." and replace with "...as described in AC 25-7D,..."	Agree. Change made.
33.	Paragraphs 8.4.5.1 - 8.4.5.3, page 10	As per the rule cited above, Heading 4 paragraphs should not be aligned with Heading 1-3 paragraphs. Also, if the "Note:" goes with these three paragraphs, it should be indented with them as well.	Per template	Indent all Heading 4 paragraphs to 1.5". Indent the corresponding "Note:" to align with the Heading 4 paragraphs.	Agree. Change made.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
34.	Paragraph 8.4.7, page 10	The final sentence in the parentheses has an extra space between "should" and "be".	Grammar	Please remove the extra space.	Agree. Change made.
35.	Paragraph 8.4.7, page 10	There is a page break in the text after 8.4.7 that should be removed.	Consistent formatting	Remove the page break after 8.4.7.	Agree. Change made.
36.	Paragraph 8.4.5.2, page 10	This paragraph has no punctuation at its end.	Grammar	Please insert a period at the end of the sentence.	Agree. Change made.
37.	Paragraph 8.5.6, page 11	The reference to "Figure 2" should use lower case: "figure 2" Also, figure 2 should be moved to the space just after 8.5.6 -- just after its first reference.	Consistent formatting	Change "Figure 2" to "figure 2". Also, move figure 2 to just below 8.5.6. and above 8.6.	Agree. Change made.
38.	Paragraph 8.6.2, page 12, Figure 2	The title of Figure 2 should be centered and in bold font	Per template	Center Figure 2's title and make it bold. It should also be labeled as a table, not a figure	Agree. Change made.
39.	Paragraph 8.6.2, page 12, Figure 2, Runway Condition Code 2	A period is needed after the text in the "Wheel Braking Coefficient" column for Runway Condition Code 2.	Grammar	Add a period after the following: "...speed and above – 0.05 ² ."	Agree. Change made.

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Commenter: AIR-500					
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40.	Paragraph 8.6.2, page 12, Figure 2, footnote 2	As stated above, the specific reference to a paragraph such as 11.3.4.2.1 should not be used.	To keep text current	Strike this specific reference such that the statement reads: "(See AC 25-7D for how to....)"	Agree. Change made.
41.	Paragraph 10.1.2, page 14	The full wording for AC 25.939-1 is already defined above, so it is not needed again here.	Proper acronym usage	Please end the sentence with "...described in AC 25.939-1." Please strike the rest of that original sentence that ends with "...1986 (or later revision)."	Partially agree. Removed the AC title and date, but kept "or later revision."
42.	Paragraph 11.3, page 16	EASA should be used instead of the full wording	Proper acronym usage	Replace "European Aviation Safety Agency" with "EASA".	Agree. Change made.
43.	Paragraph 11.3, page 16	11.3 is followed by a list of four caveats that should be listed in 3-digit Header 3 format: 11.3.1 through 11.3.4 (as is done in 12.3.1 through 12.3.4)	Per template	Change the Header 2 formatting to Header 3 formatting for this list, and please indent to 1.5".	Agree. Change made.
44.	Paragraph 11.4, page 16	Should the reference in 11.4 to "Table 2" instead by "figure 2"? If not, where is table 2?	Clarity for reader	Please clarify this reference.	Changed reference to "table 2."

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
45.	Paragraph 11.8, page 16	The paragraph title "Reverse Thrust Credit." should be on its own line and in bold font. The text should begin on the next line.	Per template.	Replace "Reverse thrust credit." with " Reverse Thrust Credit. " and then move the text to the next line.	Partially agree. Instead deleted the heading since it is not needed and the other parallel paragraphs do not have headings.
46.	Paragraphs 12.1 and 12.2, page 16	Each word of these titles should be capitalized, and the title should be on its own line. The text should start on a new line.	Per template.	Titles should be changed to " Data Location. " and " Approval Status. " (The second word should be capitalized in each title.) The corresponding text for each should start on a new line below each title.	Agree. Change made.
47.	Paragraph 12.3, page 16	Significant words in this title should be capitalized, as per the previous edit called for above in the TOC section. (Note: all such edits should be made in the AC text, which will automatically be reflected in the TOC if the MS Word TOC function is used.)	Consistent formatting	Change title to "Information to be Provided in addition to the Landing Performance Data." (Note the four new words that are capitalized.)	Partially agree. Instead revised heading to "Other Information," and moved the sentence below the heading as a lead-in to the criteria that follow.
48.	Paragraph 12.3.1, page 16	This Heading 3 title should be <u>underlined</u> and should use initial capitalization.	Per template	Replace "Instructions for use." with " <u>Instructions for Use.</u> "	Disagree. This is not a heading. It is one criterion of a list of document information that should be provided.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
49.	Paragraph 12.3.4, page 17, Signature Block:	Since the cover page has the signature block properly displayed there (as per the template), the word "END" is not needed at the end of this AC's text.	Per template	Remove the word "END" at the end of the AC's text on page 17.	Agree. Change made.
50.	Appendix A, page A-1	The title of this appendix is missing a period.	Consistent formatting	Please add a period after "Appendix A" and before the word "Advisory."	Disagree. The Feedback Form should be included as an attachment to the AC, not an appendix. Therefore, we removed the appendix heading.