

DOCUMENT REVIEW LOG – ALL COMMENTS

1. Document No.: AC 45-2E, Identification and Registration Marking	2. Project Lead: Suzanne Ball, AIR-112, (202) 267-1572	3. AIR-100 Management Concurrence and Date: 	5. Date of AIR-100 Disposition: 6/26/2015	
Comments Not Adopted or Accommodated				
TOTAL COUNT Total count of comments received: 375 Total count of comments Adopted: 40 Total count of comments Partially Adopted: 10 Total count of comments Non-Concur: 17 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 8	ANE-100 Total count of comments received: 0 Total count of comments Adopted: 0 Total count of comments Partially Adopted: 0 Total count of comments Non-Concur: 0 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0	ACE-100 Total count of comments received: 15 Total count of comments Adopted: 5 Total count of comments Partially Adopted: 2 Total count of comments Non-Concur: 3 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 5	ANM-100 Total count of comments received: 8 Total count of comments Adopted: 6 Total count of comments Partially Adopted: 1 Total count of comments Non-Concur: 1 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0	ASW-100 Total count of comments received: 4 Total count of comments Adopted: 0 Total count of comments Partially Adopted: 1 Total count of comments Non-Concur: 0 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 3
	AMA-220 Total count of comments received: 0 Total count of comments Adopted: 0 Total count of comments Partially Adopted: 0 Total count of comments Non-Concur: 0 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0 [NO RESPONSE]	AIR-40 Total count of comments received: 10 Total count of comments Adopted: 9 Total count of comments Partially Adopted: 0 Total count of comments Non-Concur: 1 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0	AFS-1 Total count of comments received: 23 Total count of comments Adopted: 9 Total count of comments Partially Adopted: 5 Total count of comments Non-Concur: 9 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0	AIR-500 Total count of comments received: 15 Total count of comments Adopted: 11 Total count of comments Partially Adopted: 1 Total count of comments Non-Concur: 3 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0
	CSTA Total count of comments received: 0 Total count of comments Adopted: 0 Total count of comments Partially Adopted: 0 Total count of comments Non-Concur: 0 Total count of comments Concur but Outside the Scope: 0 Total count of Questions or Statements Answered: 0			

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Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by AIR-100 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

Block 5: To be completed by AIR-100 PM, after receiving comments from field offices. Enter date of disposition.

The below columns to be completed by the Field Offices, except for “AIR-100 Disposition” column.

AIR-100 PMs disposition comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as one of the following:

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

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	Para 6 (a)	<p>“The following information must also be displayed on propellers, propeller blades, and propeller hubs, but can be done so by means of plate, stamping, engraving, etching, or another approved method. Except for a fixed-pitch wooden propeller, the marking must be accomplished using an approved fireproof method: “</p> <p>But the definition of fire proof in the appendix C calls out steel as a reference. “Fireproof. As stated in § 1.1, General definitions, the capacity to withstand the heat associated with fire at least as well as steel.”</p> <p>AIR-150</p>	<p>There is an inconsistency. Most propellers are manufactured from a lesser heat resistance material than steel. So, stamping, engraving, etching or like methods would not meet the intended fireproof rating as steel.</p>	<p>This needs further clarification and explanation.</p>	<p>Non-concur.</p> <p>§45.11 Marking of products. (c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method.</u></p> <p>An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance with the approved design then they are compliant.</p>

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2.	Page 1, para 2(a)(1)	Missing information for unmanned aircraft systems R. Joslin – CSTA	Unmanned aircraft systems have been certified un 14CFR Part 21 and are have Type Certificate Data Sheets (e.g. Q00018LA and Q00017LA). Furthermore Section 331- Definitions of the 2012 FMRA asserts that the term “aircraft” includes unmanned aircraft systems	Change the sentence to read “... <i>the term aircraft includes powered parachutes, <u>unmanned aircraft systems</u>, and balloons</i> ”	Out of Scope. This revision is based on the upcoming part 21 rule change. In addition, Part 45 marking of products and articles may not be required, as they currently do not require (100% of all UASs) a FAA approved TC or manufacture under a FAA production approval.
3.	Page 3 Table 1	Missing information to exclude certain (i.e. small) UAS from the requirement to display identification information on the aircraft exterior R. Joslin - CSTA	Some “small” UAS do not have exterior surfaces large enough to display an identification plate for the aircraft, engine, and/or propeller	Add a row for Unmanned Aircraft System, which states the following for <i>Location</i> : <i>(1) Outside the aircraft so that it is legible from the ground, either just behind and next to the rear-most entrance door or on the side or bottom of the fuselage near the tail surface</i> <i>Comments:</i> <i>UAS that do not have a large enough exterior surface on the aircraft, engine, and/or propeller are excluded from this requirement</i>	Out of Scope. This revision is based on the upcoming part 21 rule change. In addition, Part 45 marking of products and articles may not be required, as they currently do not require (100% of all UASs) a FAA approved TC or manufacture under a FAA production approval.
4.	Page 10, Table 2	Missing information for UAS	Although the exceptions provided in Table 3 may apply to smaller UAS, many UAS are large enough to comply with the requirements for manned aircraft	Add a row to Table 2 for Unmanned Aircraft Systems that states the following: <i>Unmanned Aircraft Systems shall comply with the requirements for displaying N-Number according to</i>	Out of Scope. This revision is based on the upcoming part 21 rule change.

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		R. Joslin - CSTA		<i>the same aircraft Category/Type of their design (e.g. a fixed wing UAS shall follow the guidance provided for Fixed-Wing aircraft)</i>	Will address this comment during the next revision to AC 45-2.
5.	Overall	Please ensure that this AC is consistent with the data plate requirements in the upcoming TCDS order. ACE-110	The upcoming TCDS order also places requirements on the data plates and this AC needs to be consistent.	Please work with the author of the TCDS order to ensure that the order and AC use the same terminology and are consistent.	Out of Scope. This revision is based on the upcoming part 21 rule change. This comment should be addressed during the next revision.
6.	Appendix C Antique aircraft Page C-1 Para. (1) & (3)	The definition of an antique aircraft is incorrect. Should state: "Antique aircraft are those aircraft certificated under the Civil Air Regulations (CAR) or earlier certification basis, and manufactured before 1973." ASW-140	Please reference FAA Order 8100.8D, "Designee management Handbook" Section 307 Page 3-9, Para. C, (2) "Special Delegation for Repairs and Alternations for Vintage Airplanes and Engines"	Please change the definition of an Antiques Aircraft in App. C of the revised AC 45-2E. (1) "A U.S. registered aircraft and an aircraft or engine certified under Civil Air Regulations (CAR) or earlier certification basis, and manufactured before 1973."	Non-concur. The regulations state the following. §45.22 Exhibition, antique, and other aircraft: Special rules. (b) A small U.S.-registered aircraft built at least 30 years ago or a U.S.-registered aircraft for which an experimental certificate has been issued under §21.191(d) or 21.191(g) for operation as an exhibition aircraft...
7.	Appendix B Related Reference Material	Add FAA Order 8100.8D ASW-140	8100.8D, Section 307, has an FAA accepted definition of a Vintage Airplane.	The same definition of a Vintage Airplane can be used to describe an Antique Aircraft in AC 45-2E.	Non-concur. See above.
8.	Page 2 Para 4. B.	Many propeller hubs and blades are not fireproof therefore, the marking should	Many propeller hubs and blades are aluminum, which has a melting temperature	Change "fireproof" to "permanent" as follows:	Non-concur. §45.11 Marking of products.

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		<p>not require fireproof marking. When the CARS were converted to FARs in the 1960's, "permanently" was changes to "fireproof" without acknowledgment that most propellers would not be compliant with the new requirement.</p> <p>ANE-111</p>	<p>less than steel and therefore ins not fireproof. Also, some fixed pitched propellers are made of composite materials, which are not fireproof, and future propeller blade designs may completely be composite.</p>	<p>b. Revises language to clarify that a fireproof identification plate is not required for propellers, propeller blades, or propeller hubs, but is an acceptable method for permanent fireproof part marking.</p>	<p>(c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method</u>.</p> <p>An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance with the approved design then they are compliant.</p>
9.	Page 2 Para 6. a.	<p>See comment above regarding fireproof.</p> <p>ANE-111</p>	<p>See reason above regarding fireproof.</p>	<p>Change "fireproof" to "permanent" as follows:</p> <p>Aircraft propellers, propeller blades, and propeller hubs are required to display the following information using a permanent fireproof-method by means of plate, stamping, engraving, etching, or another approved method.</p>	<p>Non-concur.</p> <p>§45.11 Marking of products. (c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method</u>.</p> <p>An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an</p>

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					approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance with the approved design then they are compliant.
10.	Page 2 para 6. a.	<p>The TC number should not be required to be marked on propeller blades. This is an over specification since propeller blades may be installed in propellers with different TC numbers.</p> <p>Hartzell propeller requested an exemption to this requirement in 2013 because they have never included the TC number on the propeller blades. This dates back to the 1940's. The exemption is still under consideration.</p> <p>The propeller and blade configuration control is established on the propeller type certificate data sheet.</p> <p>Hartzell has some propeller blades that can be installed on 17 unique propeller type designs.</p> <p>ANE-111</p>	Some propeller blades are used on many different propeller type designs and therefore a conflict and confusion would exist when the propeller TC number does not match the propeller TC number. Also, TCs are issued for a propeller not individual propeller blades.	<p>Add the following sentences to the paragraph:</p> <p>The TC number is not required for propeller blades.</p>	<p>Non-concur/out of scope.</p> <p>§ 45.11 (c)(2) requires the TC number, if applicable, be included per § 45.13(a)(4).</p> <p>This recommendation will need to be addressed during the next rule making effort.</p>

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11.	Pg. 2, Para. 6.a.	<p>Wooden props are now allowed to display marking which are not fireproof. But there are many Sensenich and McCauley (among others) fixed pitch aluminum props that have the required data stamped on or near the hub, in the aluminum material. No data plate has ever been used. This is something new.</p> <p>ANE-MIDO-44</p>	By Part 1 “fireproof” definition, stamping in aluminum material is not “fireproof”, but this has been the matter of course for many years in industry.	Account for markings in fixed pitch aluminum props not being “fireproof” per the definition.	<p>Non-concur.</p> <p>§45.11 Marking of products. (c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method</u>.</p> <p>An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance with the approved design then they are compliant.</p>
12.	Page 2, Paragraph 3	<p>In this section it states the “Effective Date. This AC is effective 180 days after publication of... under docket number FAA-2013-0933.” Is the reference to “2013” accurate?</p> <p>AIR-500</p>	Accuracy of text	If the reference to “2013” is not accurate, please correct it as needed.	<p>Non-concur.</p> <p>This reference is correct.</p>
13.	Page 2, Paragraph 6. a.	<p>The title/heading of 6.a. is as follows:</p> <p>“a. Information to be</p>	Ease of reading	If this is the standard way of referring to such within the aviation community, then perhaps no change is needed. It would be	<p>Non-concur.</p> <p>This reference is clear to aviation industry.</p>

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		<p>Included as Identification." There seems to be a word missing after "identification."</p> <p>AIR-500</p>		<p>clearer, however, to say: " a. Details to be Included as Identification Information" – or something like this.</p>	
14.	Page 3, Table 1	<p>The title of the second column in this table is "Location." Would this table be clearer for the reader if the second column was labeled "Acceptable Locations"?</p> <p>AIR-500</p>	Clarity of text	<p>Consider changing the column heading from "Location" to "Acceptable Locations".</p>	<p>Non-concur.</p> <p>Adding "acceptable" is unnecessary since it is already implied.</p>
15.	Page 3, Table 1	<p>Under point (2), the following information is listed under "Location."</p> <p>"The following aircraft are excluded from the requirement to display identification information on the aircraft exterior: ..."</p> <p>This point does not seem to fit under "Location."</p> <p>AIR-500</p>	Clarity of text	<p>Point (2) is a comment/exception that seems to fit better under the "Comments" column. If you agree, please move all of (2) to the third column of Table 1.</p>	<p>Non-concur.</p> <p>This information is taking from the regulations.</p>
16.	Page 4, Paragraph 6. d.	<p>As in the suggested edit above (Item No. 4), there seems to be a word missing after "identification."</p>	Ease of reading	<p>Please consider changing from: "Information to be displayed as identification is described in paragraph 6a." to: "Information to be displayed as identification requirements is described in paragraph 6a." Or "Details to be displayed as</p>	<p>Non-concur.</p> <p>This reference is clear to aviation industry.</p>

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		AIR-500		identification information are described in paragraph 6a.”	
17.	Page 5, Paragraph 6. e. (8)NOTE:	<p>The Note: has an indented margin, as it should, but it also has a vertical line along the left side of the NOTE: paragraph.</p> <p>There is another NOTE: below (page 6) that does not have the vertical line.</p> <p>AIR-500</p>	Consistent formatting	Please remove vertical line along NOTE: so that it matches the formatting of the NOTE on page 6.	<p>Non-concur.</p> <p>The vertical line indicates that a change has been made to that paragraph.</p>

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1. Document No.: AC 45-2E, Identification and Registration Marking	2. Project Lead: Suzanne Ball, AIR-112, (202) 267-1572	3. Reviewing Office (Name and Phone Number):	4. Date of Review:	5. Date of AIR-100 Disposition: 4/28/15
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	Page 1, para 2(a)(1)	Missing information for unmanned aircraft systems R. Joslin – CSTA	Unmanned aircraft systems have been certified un 14CFR Part 21 and are have Type Certificate Data Sheets (e.g. Q00018LA and Q00017LA). Furthermore Section 331-Definitions of the 2012 FMRA asserts that the term “aircraft” includes unmanned aircraft systems	Change the sentence to read “... <i>the term aircraft includes powered parachutes, <u>unmanned aircraft systems</u>, and balloons</i> ”	Out of Scope. This revision is based on the upcoming part 21 rule change. In addition, Part 45 marking of products and articles may not be required, as they currently do not require (100% of all UASs) a FAA approved TC or manufacture under a FAA production approval.
2.	Page 3 Table 1	Missing information to exclude certain (i.e. small) UAS from the requirement to display identification information on the aircraft exterior R. Joslin - CSTA	Some “small” UAS do not have exterior surfaces large enough to display an identification plate for the aircraft, engine, and/or propeller	Add a row for Unmanned Aircraft System, which states the following for <i>Location</i> : <i>(1) Outside the aircraft so that it is legible from the ground, either just behind and next to the rear-most entrance door or on the side or bottom of the fuselage near the tail surface</i> <i>Comments:</i> <i>UAS that do not have a large enough exterior surface on the aircraft, engine, and/or propeller are excluded from this requirement</i>	Out of Scope. This revision is based on the upcoming part 21 rule change. In addition, Part 45 marking of products and articles may not be required, as they currently do not require (100% of all UASs) a FAA approved TC or manufacture under a FAA production approval.

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3.	Page 10, Table 2	Missing information for UAS R. Joslin - CSTA	Although the exceptions provided in Table 3 may apply to smaller UAS, many UAS are large enough to comply with the requirements for manned aircraft	Add a row to Table 2 for Unmanned Aircraft Systems that states the following: <i>Unmanned Aircraft Systems shall comply with the requirements for displaying N-Number according to the same aircraft Category/Type of their design (e.g. a fixed wing UAS shall follow the guidance provided for Fixed-Wing aircraft)</i>	Out of Scope. This revision is based on the upcoming part 21 rule change. Will address this comment during the next revision to AC 45-2.
4.	Page 3, Table 1, Location Column, under Propellers, propeller blades, or propeller hubs.	The wording, "Place where it will not likely be lost or destroyed in an accident", is not included in the location column under Propellers. ANM-108	This wording is in 14 CFR 45.11(c) (4) for propellers, propeller blades & hubs. However, you do include it in the same table for Engines.	Add to the location column the same wording that you have under Engines to the location column for propellers, propeller blades, or propeller hubs.	Adopted.
5.	Page 8, Table 2, Airships.	The word "or" should be "and". ANM-108	14 CFR 45.27(b)(1) uses the word "and", not "or".	Separate into two table entries and keep requirements consistent with 45.27.	Adopted.
6.	Page 12, Table 3, Exceptions column, row 2 for rotorcraft.	Date listed as "before December <u>21</u> , 1983", should be "before December <u>31</u> , 1983". ANM-108	14 CFR 45.29 (b)(3) states "before December 31, 1983".	Change "21" to "31".	Adopted.
7.	Page 6 Paragraph 6.i.(2)	This paragraph reads, "You are required not to use an identification plate from a scrapped or	Clarity, plain language.	Suggest replacing "required not to use" with something like "prohibited from using."	Adopted.

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		destroyed aircraft or aircraft engine.” The language “required not to use” seems awkward.” ANM-108			
8.	Overall	Please ensure that this AC is consistent with the data plate requirements in the upcoming TCDS order. ACE-110	The upcoming TCDS order also places requirements on the data plates and this AC needs to be consistent.	Please work with the author of the TCDS order to ensure that the order and AC use the same terminology and are consistent.	Out of Scope. This revision is based on the upcoming part 21 rule change. This comment should be addressed during the next revision.
9.	Page A-2	Appendix A should also include a reference to 14 CFR Part 91 as well. ACE-110	Since both parts 121 and 135 were referenced, part 91 should be referenced to be complete.	Add a reference to 14 CFR Part 91.	Adopted.
10.	Page 3, Paragraph b, Table 1, (2)	There appears to be an error in the sentence “...gliders that operate are under a Federal Aviation Administration (FAA)-approved continuous Airworthiness maintenance program;...” ANE-142	Does not match the format of the rest of the paragraph.	Suggest change to: “...gliders that operate under a Federal Aviation Administration (FAA)-approved continuous Airworthiness maintenance program;...”	Adopted.
11.	Appendix C Antique aircraft Page C-1 Para. (1) & (3)	The definition of an antique aircraft is incorrect. Should state: “Antique aircraft are those aircraft certificated under the Civil Air Regulations (CAR) or earlier certification basis, and manufactured before	Please reference FAA Order 8100.8D, “Designee management Handbook” Section 307 Page 3-9, Para. C, (2) “Special Delegation for Repairs and Alternations for Vintage Airplanes and Engines”	Please change the definition of an Antiques Aircraft in App. C of the revised AC 45-2E. (2) “A U.S. registered aircraft and an aircraft or engine certified under Civil Air	Non-concur. The regulations state the following. §45.22 Exhibition, antique, and other aircraft: Special rules. (b) A small U.S.-registered

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		1973.” ASW-140		Regulations (CAR) or earlier certification basis, and manufactured before 1973.”	aircraft built at least 30 years ago or a U.S.-registered aircraft for which an experimental certificate has been issued under §21.191(d) or 21.191(g) for operation as an exhibition aircraft...
12.	Appendix B Related Reference Material	Add FAA Order 8100.8D ASW-140	8100.8D, Section 307, has an FAA accepted definition of a Vintage Airplane.	The same definition of a Vintage Airplane can be used to describe an Antique Aircraft in AC 45-2E.	Non-concur. See above.
13.	Page 2 Para 4. B.	Many propeller hubs and blades are not fireproof therefore, the marking should not require fireproof marking. When the CARS were converted to FARs in the 1960's, “permanently” was changes to “fireproof” without acknowledgment that most propellers would not be compliant with the new requirement. ANE-111	Many propeller hubs and blades are aluminum, which has a melting temperature less than steel and therefore ins not fireproof. Also, some fixed pitched propellers are made of composite materials, which are not fireproof, and future propeller blade designs may completely be composite.	Change “fireproof” to “permanent’ as follows: b. Revises language to clarify that a fireproof identification plate is not required for propellers, propeller blades, or propeller hubs, but is an acceptable method for permanent fireproof part marking.	Non-concur. §45.11 Marking of products. (c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method</u> . An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance

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					with the approved design then they are compliant.
14.	Page 2 Para 6. a.	See comment above regarding fireproof. ANE-111	See reason above regarding fireproof.	Change “fireproof” to “permanent” as follows: Aircraft propellers, propeller blades, and propeller hubs are required to display the following information using a permanent fireproof method by means of plate, stamping, engraving, etching, or another approved method.	Non-concur. §45.11 Marking of products. (c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method</u> . An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance with the approved design then they are compliant.
15.	Page 2 para 6. a.	The TC number should not be required to be marked on propeller	Some propeller blades are used on many different propeller type designs and	Add the following sentences to the paragraph:	Non-concur/out of scope. § 45.11 (c)(2) requires the

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		<p>blades. This is an over specification since propeller blades may be installed in propellers with different TC numbers.</p> <p>Hartzell propeller requested an exemption to this requirement in 2013 because they have never included the TC number on the propeller blades. This dates back to the 1940's. The exemption is still under consideration.</p> <p>The propeller and blade configuration control is established on the propeller type certificate data sheet.</p> <p>Hartzell has some propeller blades that can be installed on 17 unique propeller type designs.</p> <p>ANE-111</p>	<p>therefore a conflict and confusion would exist when the propeller TC number does not match the propeller TC number. Also, TCs are issued for a propeller not individual propeller blades.</p>	<p>The TC number is not required for propeller blades.</p>	<p>TC number, if applicable, be included per § 45.13(a)(4).</p> <p>This recommendation will need to be addressed during the next rule making effort.</p>
16.	Page 3, Paragraph b, Table 1, (2)	<p>There appears to be an error in the sentence "...gliders that operate are under a Federal Aviation Administration (FAA)-approved continuous Airworthiness maintenance program;..."</p> <p>ANE-142</p>	<p>Does not match the format of the rest of the paragraph.</p>	<p>Suggest change to: "...gliders that operate under a Federal Aviation Administration (FAA)-approved continuous Airworthiness maintenance program;..."</p>	<p>Adopted.</p>

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17.	Pg. 2, Para. 6.a.	<p>Wooden props are now allowed to display marking which are not fireproof. But there are many Sensenich and McCauley (among others) fixed pitch aluminum props that have the required data stamped on or near the hub, in the aluminum material. No data plate has ever been used. This is something new.</p> <p>ANE-MIDO-44</p>	By Part 1 “fireproof” definition, stamping in aluminum material is not “fireproof”, but this has been the matter of course for many years in industry.	Account for markings in fixed pitch aluminum props not being “fireproof” per the definition.	<p>Non-concur.</p> <p>§45.11 Marking of products. (c) Propellers and propeller blades and hubs. Each person who produces a propeller, propeller blade, or propeller hub under a type certificate or production certificate must mark each product or part using an <u>approved fireproof method</u>.</p> <p>An aircraft or engine requires an attached fireproof ID plate. For a propeller, it is an approved (FAA) fireproof method. The marking requirements are part of the FAA approved type design. As long as the propellers are marked in accordance with the approved design then they are compliant.</p>
18.	Page 1, Header	<p>The solid line under the “Subject:” portion of the header is longer than what is normal.</p> <p>AIR-500</p>	Consistent formatting	Consider shortening the line so that the end of the line aligns with the end of the word “Registration” in the upper line or extends just a few spaces beyond it.	Adopted.
19.	Page 1, Paragraph 2. c.	The comma in “c.” does not belong, and the last phrase could be worded to improve the meaning of this point.	Grammar and clarity	Please remove the comma, and if accurate, rewrite the end of the sentence to clarify the intent, such as:	Partially Adopted. Removed the comma from the paragraph, however, the phrase “under TC

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		AIR-500		“The discussion of marking requirements applies to all PAHs, and only to those manufacturers producing under type certificate (TC) only. ”	only” is commonly used in industry and within the FAA.
20.	Page 2, Paragraph 3	In this section it states the “ Effective Date. This AC is effective 180 days after publication of... under docket number FAA-2013-0933.” Is the reference to “2013” accurate? AIR-500	Accuracy of text	If the reference to “2013” is not accurate, please correct it as needed.	Non-concur. This reference is correct.
21.	Page 2, Paragraph 6. a.	The title/heading of 6.a. is as follows: “a. Information to be Included as Identification. ” There seems to be a word missing after “identification.” AIR-500	Ease of reading	If this is the standard way of referring to such within the aviation community, then perhaps no change is needed. It would be clearer, however, to say: “ a. Details to be Included as Identification Information ” – or something like this.	Non-concur. This reference is clear to aviation industry.
22.	Page 2, Paragraph 6. a. (8) and UNIVERSAL	(8) includes the following: “Approved designations include comply, exempt, and non-U.S. for engines specified in part 34,...” It seems that these special classifications and designations should be in quotation marks to indicate that they are	Ease of reading and standard formatting	Please consider putting these three words in quotations, as follows: “Approved designations include <u>“comply,”</u> <u>“exempt,”</u> and <u>“non-U.S.”</u> for engines specified in part 34,...”	Adopted.

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		such. AIR-500			
23.	Page 3, Table 1	The title of the second column in this table is "Location." Would this table be clearer for the reader if the second column was labeled "Acceptable Locations"? AIR-500	Clarity of text	Consider changing the column heading from "Location" to "Acceptable Locations".	Non-concur. Adding "acceptable" is unnecessary since it is already implied.
24.	Page 3, Table 1	Under point (2), the following information is listed under "Location." "The following aircraft are excluded from the requirement to display identification information on the aircraft exterior: ..." This point does not seem to fit under "Location." AIR-500	Clarity of text	Point (2) is a comment/exception that seems to fit better under the "Comments" column. If you agree, please move all of (2) to the third column of Table 1.	Non-concur. This information is taking from the regulations.
25.	Page 3, Paragraph 6. c.	The title of 6.c. is on page 3 and is separated from the related portions of this AC, which begin on page 4. AIR-500	Consistent formatting and ease of reading	Once all edits have been done, review the document here and elsewhere to see if such elements should be reformatted so as to better connect titles/subtitles with their corresponding text. In this case, add spaces in the text to push the title to page 4, just above the	Adopted.

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				corresponding text.	
26	Page 4, Paragraph 6. d.	As in the suggested edit above (Item No. 4), there seems to be a word missing after "identification." AIR-500	Ease of reading	Please consider changing from: "Information to be displayed as identification is described in paragraph 6a." to: "Information to be displayed as identification requirements is described in paragraph 6a." Or "Details to be displayed as identification information are described in paragraph 6a."	Non-concur. This reference is clear to aviation industry.
27.	Page 5, Paragraph 6. e. (7)(b)	As mentioned above, these three status classifications should be in quotations marks.	Ease of reading and standard formatting	If you added quotation marks in the text above, then be consistent and add them here as well.	Suggestion.
28.	Page 5, Paragraph 6. e. (8)NOTE:	The Note: has an indented margin, as it should, but it also has a vertical line along the left side of the NOTE: paragraph. There is another NOTE: below (page 6) that does not have the vertical line. AIR-500	Consistent formatting	Please remove vertical line along NOTE: so that it matches the formatting of the NOTE on page 6.	Non-concur. The vertical line indicates that a change has been made to that paragraph.
29.	Page 5, Paragraph 6.f.	The title of 6.f. capitalizes "During," which is a minor word in the title.	Consistent formatting	Change "During" to "during."	Adopted.
30.	Page 6, Paragraph 6.	h.(2) contains the following:	Ease of reading	Consider striking that language and replacing	Adopted. Changed to read: (2)

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	h.(2)	<p>“You are required not to use an identification plate from a scrapped or destroyed aircraft or aircraft engine.” The use of “required not to” is awkward language.</p> <p>AIR-500</p>		<p>with: “You are required not to may not use an identification plate from a scrapped or destroyed aircraft or aircraft engine”</p>	<p>You are prohibited from using an identification plate from a scrapped or destroyed aircraft or aircraft engine.</p>
31.	Page 6, Paragraph 7.a.	<p>In the title of 7.a., the word “Between” is a minor word, and yet it is capitalized.</p> <p>AIR-500</p>	Consistent formatting	<p>Replace “Between” with “between” in the title of 7.a.</p>	Adopted.
32.	Page 6, Paragraph 7.a.(1)	<p>7.a. (1) is worded: “You are not to place any text or graphic between any of the letters or numbers in the N number unless the aircraft is an antique aircraft.” The language used here (“You are not to...”) is weak and could be stronger.</p> <p>AIR-500</p>	Clarity of instructions	<p>Consider replacing “You are not to...” with “You may not place....”</p>	Adopted.
33.	Page 7, Paragraph 7.c.(2)	<p>7.c.(2) is worded: “Check the reflectance of external markings. Using electro-optical instruments or photometer card sets is an acceptable means of verifying reflectance, but these are not required to establish reflectance.” The reference to “these” is a bit ambiguous and</p>	Clarity of text	<p>Consider adding the word “methods” after “these” so that it reads: “..., but these methods are not required...” or “...these tests are not...”</p>	Adopted.

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		should be clarified. AIR-500			
34.	Page A-1, Paragraph 14 CFR part 21	14 CFR part 21 is worded: "...Part 21 sets forth rules for the issue of and change to TCs,...", and the use of "issue of" is a bit awkward and inconsistent with the use in the AC's text below where "issuance of" is used. AIR-500	Ease of reading and consistency of language	Please change "issue of" to " issuance of and change to TCs..."	Adopted.
35.	Page D-1, Appendix D, first paragraph	The first paragraph contains the following: "...you may let us know about by using this page as a template...." The word "it" is missing in this sentence. AIR-500	Ease of reading	Insert the word "it" as follows: "...you may let us know about it by using this page as a template...."	Adopted.