

DISPOSITION OF FAA COMMENTS

AC 25-31, Approval of Takeoff Performance Data for Operations on Contaminated Runways

Prepared by Don Stimson and Joe Jacobsen, ANM-111

No.			
Commenter: Davenport, AAS-300			
1.	Add the following AC to the list on page 2, paragraph 3.3: “Airport Field Condition Assessment and Winter Operations Safety,” AC 150/5200-30D	This new/revised airport AC will have language, definitions, and forms addressing airport operators’ responsibilities for contaminated runways/surfaces that should be highlighted in AC No: 25-XX	Added to this AC and the AC for “Approval of Landing Performance Data for Time of Arrival Landing Performance Assessments.”
2.	Align definitions in this AC with the list of definitions reviewed by the TALPA group. TALPA group consensus was to harmonize definitions across all LOBs when used in future regulatory or guidance documents. List of definitions is attached.	Same as above.	Although the definitions are actually still in flux, we will use the final agreed upon definitions in both this AC and the AC for “Approval of Landing Performance Data for Time of Arrival Landing Performance Assessments.”

No.			
Commenter: R. McElroy, ACE-117C			
1.	Consider addition of paragraph 6.5.5.1 as follows:	It is recommended that manufacturers consider the effects of directional controllability associated with aircraft gross weight, center of gravity, and takeoff thrust settings with reference to engine failure and/or crosswind guidance on a contaminated runway.	The items referenced in this comment have been added to paragraph 8.5 (previously paragraph 6.5.5) as additional items to consider in providing recommendations or guidelines to operators for mitigating their effect on directional controllability when operating on contaminated runways.

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No.			
Commenter: Roell, ACE-117W			
1.	<p>In paragraph 6.4, Table 2 lists a Runway Surface Condition Description of:</p> <p>“Warmer than 15° C outside air temperature</p> <ul style="list-style-type: none"> • Compacted Snow” <p>I suspect the temperature should be -15 °C</p>	<p>Change Runway Surface Condition Description to:</p> <p>“Warmer than 15 °C outside air temperature</p> <ul style="list-style-type: none"> • Compacted Snow” 	Typo corrected.

No.			
Commenter: John Neff, ANM-160S			
1.	<p>The following requirement is “hanging loose” at the end of Page 9:</p> <p>“Statements that the data are based on a uniform depth (for loose contaminants) and uniform coverage of a layer of contaminant with uniform properties throughout.”</p>	<p>The statement appears to be lacking a section identification number, such as “7.3.4.” Otherwise document looks good!</p>	This formatting issue has been fixed.

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No.			
Commenter: John Hed, ANM-160S			
1.	Nowhere is there any discussion about possible changes to use of thrust reversers when on a contaminated runway, especially with crosswinds. It may be disadvantageous to use them in some cases.	Suggest paragraph 6.5.5 add a statement such as: “Changes to the procedures for the use of thrust reversers (single or dual engine may also need to be considered when rejecting a takeoff on contaminated runways.	There should have been an entire section of guidance related to credit for reverse thrust on contaminated runways similar to what is being proposed in the draft AC on “Approval of Landing Performance Data for Time of Arrival Landing Performance Assessments.” This information was inadvertently left out of this AC. It has now been added.
2.	Nowhere is there any talk of limits for the amount of contaminants allowed to takeoff.	I think there should be a statement that the manufacturer should propose limitations in the AFM for maximum contaminant depth recommended for takeoff.	Paragraph 6.3 contains the statement: “Due to issues of potential structural damage from spray impingement, engine ingestion, and significant effects on one-engine-inoperative acceleration capability, the maximum recommended depth for takeoff operations for slush, wet snow, and standing water is ½ inch.” We have underlined this statement to highlight it. Paragraph 6.3 also states that data for contaminants depths up to the maximum depth for each contaminant for which approval of the data is sought. Paragraph 11.3.3 states that the following should be provided: “Limitations prohibiting taking off on runways with contaminants and depths beyond those covered in the performance data.” No changes were made in response to this comment.

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No.			
Commenter: John Hed, ANM-160S			
3.	Taking off on contaminated runways can severely affect the planes ability to generate side force to counteract crosswind or other asymmetries such as an engine failure. This loss of directional capability will significantly affect the airplane’s true Vmcg (minimum ground control speed) and thusly the proper takeoff speeds (V1 and Vr).	Somewhere in this AC, it should suggest the manufacturer address the contaminated runway effects on possible reduced crosswind limits and/or changes to takeoff speeds due to increased Vmcg speed.	Paragraph 6.5.5 states: “It is recommended that manufacturers consider the effects of directional controllability associated with crosswind and provide recommendations or guidelines to the operators for different runway conditions. Minimum V ₁ and/or crosswind guidance may need to be adjusted in consideration of the reduced controllability following engine failure on a contaminated runway.” No changes are being made resulting from this comment.

Commenter: G. Long, AIR-110			
1.	The TALPA ARC addressed both takeoff and landing performance, but the AC only covers takeoff. So, it is unclear what the FAA expects for landing performance data on contaminated/slippery runways.	It would be helpful to add a discussion on what FAA expects for operators to use for landing performance data on contaminated runways, since this AC is applicable to takeoff only.	There is a separate AC that has been proposed to address the landing performance data for before-landing performance assessments, including data for contaminated/slippery runways. A draft of that AC was circulated for internal FAA comment concurrently with this AC for takeoff performance data on contaminated/slippery runways.

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No.	Comment	Requested Change	Disposition
Commenter: G. Long, AIR-110			
2.	Paragraph 1: The main point of the first sentence seems to be how to develop data, not who develops it. I think it would be good to add a 3 rd sentence that addresses who (in lieu of the Note).	<p>Suggest redrafting first sentence as “This AC provides guidance and standardized methods <u>to develop</u> takeoff performance data for operations on contaminated runways.”</p> <p>Add a third sentence, something like “Type certificate (TC) holders, TC applicants, airline operators and other parties, can develop takeoff performance data for operations on contaminated runways”</p> <p>Make corresponding changes to cover page of AC.</p>	Accepted. The AC has been revised accordingly.
3.	Paragraph 2.1: I’m not sure what is meant by “and their designees.” Aren’t they FAA designees?	Change “and their designees” to “and FAA designees.”	Accepted. Change made.
4.	Paragraph 2.2: I am not sure what is meant by “You may follow alternate FAA-approved design recommendations.” What design recommendations?	Please clarify.	This is boilerplate wording that really does not fit this AC, which is not providing means of compliance to a regulatory requirement. The text has been modified to indicate only that the guidance is neither mandatory nor regulatory in nature and does not constitute a requirement.
5.	Paragraph 2.3: I am not sure what is meant by “And we may require additional substantiation or design changes as a basis for finding compliance.” What design changes?	Please clarify.	This is boilerplate AC language that does not belong in this AC. It has been removed.

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6.	Paragraph 4.2: As written this implies that FAA is proceeding with rulemaking that will require TC holders to provide performance data for operations on contaminated runways. Is this correct?	Please clarify.	The paragraph correctly conveys the current status of the TALPA ARC recommendations. No changes are being made to the AC in response to this comment.
7.	Paragraph 5 includes “Water” as a contaminant. Typically, I think we refer to “Standing Water” as a contaminant, to differentiate it from a wet runway.	Change “Water” to “Standing Water”	Water need not be standing to be a contaminant. Differentiating between a water contaminated runway and a wet runway is done on the basis of the depth of the water. No changes are being made to the AC in response to this comment.
8.	Paragraph 5. Loose Contaminant: The definition is awkward (“those contaminants that an airplane’s tire will not remain on the surface of without breaking through”).	Perhaps it would be better to define a loose contaminant as one that is not solid?	The definitions of loose and solid contaminants are mirror images of each other—Solid contaminants are those contaminants that an airplane’s tire will remain on top of and not break through, and loose contaminants are those contaminants that an airplane’s tire will not remain on the surface of without breaking through. Therefore, a loose contaminant already is defined as one that is not solid. No changes are being made to the AC in response to this comment.
9.	The description of Runway Surface Condition includes a reference to landing performance.	Remove reference to landing performance.	The word “landing” has been changed to “takeoff.”
10.	Paragraph 6.2, Table 1: “Compact Snow”	Change to “Compacted Snow” for consistency.	Good catch. The suggested change has been made.

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Commenter: G. Long, AIR-110			
11.	Paragraph 6.2.1. Suggest highlighting the maximum recommended depth of ½ inch for slush, wet snow and standing water.	Highlight this recommendation.	The text has been underlined to highlight it.
12.	Paragraph 6.4, Table 2: According to the definitions in this AC, dry and wet runways are not contaminated runways.	Delete dry runway and wet runway from this table, so to not conflict with other regulations, directives or guidance for operations on dry and wet runways.	The title of the table has been changed to refer to runway surface condition rather than runway contaminant type. We agree that dry and wet runways are runway surface conditions, not contaminant types.
13.	Paragraph 6.4, Table 2: According to the definitions in this AC, “slippery when wet” is not a contaminated runway.	Delete “slippery when wet.” Or, if it is desired to expand the applicability of this AC to include slippery runways, then Title and Applicability should be adjusted accordingly.	“Slippery when wet” is a runway surface condition that results in a lower braking coefficient than a normal wet runway. The title of the table has been changed to clarify that the table provides wheel braking coefficients as a function of runway surface condition.
14.	Paragraph 6.4, Table 2: Table is confusing with compacted snow split apart by temperature. Suggest re-organizing with compacted snow in one section.	Re-arrange table.	The wheel braking coefficient on compacted snow depends on the temperature. The effect of different runway surface conditions have been grouped by their effect on the wheel braking coefficient. No changes are being made to the AC in response to this comment.

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Commenter: G. Long, AIR-110			
15.	Paragraph 6.4, Table 2: Do we need to require a specific braking coefficient for all operations on ice? Why not let the performance data be calculated for a range of coefficients and let the operators use the performance based on the coefficient for the actual conditions?	Allow data to be provided for slippery runway operations and let operator select appropriate braking coefficient based on actual conditions.	The operator does not know the actual braking coefficient. Data can be provided in two forms, one based on pilot reported braking action, the other on the runway surface condition. For each, a braking coefficient must be prescribed in order for the data provider to develop the data. For each of the runway surface conditions, including ice, the prescribed wheel braking coefficient provides the best, conservative estimate of the friction available based on available test data. No changes are being made to the AC in response to this comment.
16.	Paragraph 6.4, Table 2, Footnote 2: Should we add a note about what to do if the anti-skid system is inoperative?	Suggest adding note about dispatch with anti-skid inoperative (e.g., not recommended?).	This table is intended to be used by data providers to produce performance data, not for providing guidance to operators on dispatchable configurations. No changes are being made to the AC in response to this comment.
17.	Paragraph 6.6.2 is a discussion on acceptability of landing performance data.	Remove Paragraph 6.6.2.	The word “landing” has been changed to “takeoff.”
18.	Paragraph 7.1: Takeoff data can be provided by TC holder or another party, so it is really the TC holder’s option on where the data is furnished? What if data is provided by operator or other third party?	Suggest changing “TC holder’s option” to “data provider’s option.”	The suggested change has been made.
19.	Paragraph 7.2: “The TC holder”	Suggest changing “TC holder” to “data provider”	The suggested change has been made.
20.	Last statement on page 9 is missing a paragraph number. Is this Paragraph 7.3.4?	Add paragraph number.	The suggested change has been made.

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	Commenter: George Harrum, ASW-150		
1.	Page 1, Paragraph 3.1—Regulation listed incorrectly	Change 15.109 to 25.109.	Typo has been corrected.
2.	Page 8, Paragraph 7.2—Use of the word comingle.	Change paragraph to “Data not approved by the FAA should be labeled as advisory data only and separate from the approved data.”	The suggested change has been made.

	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 Part 121 operators? What about smaller Part 25 (Gulfstream, Cessna, LearJet, and part 125/135 aircraft)?	Require Closed Loop Substantiation of the Performance Data Presented. Clarification as to whom this is targeted as (Part 121, Part 125) Operations or operations where an Ops Spec is used. Not suggested for Part 25, Part 91 Operations	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.

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No.			
Commenter: AIR-040			
1.	5. Chart “Slippery when wet” uses feet. Should a metric equivalent be provided?		There is no requirement for providing both metric and U.S. standards. It’s easy to do because there are many conversion websites on the internet.
2.	Paragraph 6.5.3—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.

Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	Cover Page	the font under the solid line should be in 12 point size		Change to 12 point font	Agree. Change made.
2.	Cover Page	Date: The date should be the signature date		Change date to signature date once that is known	Agree. Removed date.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
3.	Cover Page	as per the template, the spacing between the opening paragraph and the signature block should be only 5 spaces		Decrease spacing to just 5 spaces	Agree. Change made.
4.	Cover Page	the cover Page needs a reference to the feedback template		Add reference to the feedback template	Agree. Change made.
5.	Cover Page	Jeff Duvén's title is no longer "Acting"		Strike "Acting" from title	Agree with the guidance, but comment is no longer applicable, since we removed the signature block. It should only be added before final issuance. It should not be included when the AC is submitted for internal FAA or public comment.
6.	Page ii - Table of Contents	some important words are in lower case Universal - template formatting is not followed		Capitalize significant words in descriptions of paragraphs like: rules, orders, information Format as per template throughout entire document	Agree. Change made.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
7.	Page ii - Table of Contents	the solid lines leading to each page number should not be solid lines		Convert each solid line to a dotted line	Agree. Change made.
8.	Page ii - Table of Contents	the "Paragraph," "Table," and "Appendix" sections should not be in bold		Remove bold font and use regular font	Agree. Change made.
9.	Page 1 and universal	<p>the template's paragraph numbering system and left-margin justifications are not followed.</p> <p>For instance, Purpose, Applicability, and Related Documents should be numbered 1, 2, and 3 respectively, and they should be aligned with the left margin.</p> <p>Also, no period belongs after the number for Heading 1 subtitles like "Purpose"</p>		<p>Reformat the entire AC in accordance with the ANM template in regard to paragraph numbering, margins, and indentations.</p> <p>For instance, remove the period after paragraph 1, 2, 3...</p>	Agree. Change made.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
10.	Page 1, paragraph 1 (Purpose.)	The text should start on a line below the subheading title		Using MS Styles for the formatting of the Heading 1 "Purpose", start the text on the next line (and the use of Styles will add the template's spacing after the word "Purpose")	Agree. Change made.
11.	Page 1, paragraph 1 (Purpose.)	The term "AC" was spelled out and abbreviated on the cover Page, so the same is not needed here.		Strike "(AC)" to avoid duplication	Disagree. The acronym is no longer defined on the cover page, so it needs to be defined on the first page of the AC.
12.	Page 1, paragraph 3.1	Related Documents: The section "FAA Regulations" has no period in the subheading.		Add period	Agree. Change made.
13.	Page 2, paragraph 3.2 & 3.4	no bullet should be used for the single listing of an order or an AMC		Strike the bullet	Agree. Change made.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
14.	Page 2, paragraph 3.3-bullets	the most recent version of an AC should be referenced		Indicate to reader that the latest revision should be used. Refer to the AC as "AC 25-7" and strike "D" and "TBD." Strike "C" from the 3rd bullet and ", March 18, 1977"	The "comment" and "recommendation" are contradictory. We disagree with deleting the AC revision number. The latest version of the AC at the time of publication must be cited because guidance in a previous document might no longer be accepted or applicable. Also, we added a statement to the paragraph that specifies the reader should refer to the latest revision if the document is updated after publication of the AC.
15.	Page 2, 3.4 - Other Sources:	There is an extra space after "(EASA)" Also, confirm capitalization of title		Delete a space after (EASA) Adjust title capitalization to match document	Agree. Change made.
16.	Page 3, paragraph 5	Is the "Definitions of Terms and Concepts" a table?		Reformat or refer to Table 1 for definitions Change other Table numbers and references to them as needed for accuracy	Agree. Moved the definitions out of the table and numbered them according to the AC template.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
17.	Page 3, paragraph 5 - "Term," "Subterm," "Description"	Changing the format within the table is cumbersome. Terms are not in alphabetical order.		Reformat to make less cumbersome. Definitions and terms should be in alphabetical order.	See comment 16.
18.	Page 3, paragraph 5 - Subterm Frost:	The first three words of the definition are not needed		Strike "Frost consists of"	Disagree. These definitions were developed and recommended by an Aviation Rulemaking Committee working group. There is no reason to change it.
19.	Page 3, paragraph 5 - Subterm Ice	a period is missing after the definition		Add a period after "Frozen water"	Agree. Change made.
20.	Page 4, Definitions, Term, Slippery when wet	As per the same rule above, do not cite the most current version of an AC Also, the acronym for "Advisory Circular" should be used here		For "...150/5320-12C" strike the "C (or later revision)" Also, strike "Advisory Circular" and use acronym "AC"	Agree. Change made.
21.	Page 4, Table 1	As per the template, the name of a table should be centered and in bold.		Center the name of Table 1 and put the font in bold.	Agree. Change made.

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Commenter: AIR-500					
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22.	Page 4, paragraph 6.2.1	As per the same rule cited above, do not cite most current version of a JO.		Strike "N (or later)"	See comment 14.
23.	Page 6, Table 2	the title of the table should be in bold and centered; Also, the title should not end with a colon		Please put the title of the table in bold font and center the title Also, remove the colon and replace it with a period	Agree. Change made.
24.	Page 6, Table 2	the bullets used in the table don't add to clarity		Remove the bullets in the table	Disagree. Removing the bullets would create ambiguity where they are used for lists.
25.	Page 6, footnote 2	do not cite most recent AC and avoid reference to specific paragraph numbers		Strike "D" in "AC 25-7D" and strike "paragraph 11.3.4.2.1"	See comment 14.
26.	Page 6, paragraph 6.5	important words in the title are not capitalized		Capitalize "Drag" "Loose" and "Contaminants"	Agree. Change made.
27.	Page 6, paragraph 6.5.1	when "table 1" is referenced, it is not capitalized		Capitalize the "T" to read: (see Table 1 for...)	Disagree. The GPO Style Manual says not to capitalize "table."

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Commenter: AIR-500					
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28.	Pages 6-7, between paragraph 6.5.1 and 6.5.2	There is a paragraph that is not labeled		Create a new subparagraph label for the paragraph beginning: "Contaminant depths are..."	Agree. Change made.
29.	Page 7, paragraph 6.5.3	the acronym for EASA is all that is needed here		Strike "European Aviation Safety Agency" and "()" and use only EASA	Agree. Change made.
30.	Page 7, paragraph 6.5.3	a space is missing between 25.1591 and "for"		Add a space after 1591	Agree. Change made.
31.	Page 7, paragraph 6.5.4.1 and 6.5.4.2	These are Level 4 paragraphs and as such should be indented as per the template		Indent these two Level 4 paragraphs as they should not be aligned with Level 1-3 paragraphs	Agree. Change made.
32.	Page 7, paragraph 6.5.4.1	There are two periods after (V _{MU}).		Remove one period at the end of the sentence	Agree. Change made.
33.	Page 8, paragraph 6.6	important words in the title are not capitalized		Capitalize the following words: "Existing" "Type" and "Designs"	Agree. Change made.
34.	Page 8, paragraph 6.6.2	use the acronym instead of the full words		Strike "European Aviation Safety Agency" and insert "EASA"	Agree. Change made.

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Commenter: AIR-500					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
35.	Page 8, paragraph 7.1 and 7.2	the second word of the subtitles should be capitalized		Capitalize "Location" in 7.1 and "Status" in 7.2	Agree. Change made.
36.	Page 8, paragraph 7.3	important words in the subtitle are not capitalized		Capitalize the following words: "Provided" "Contaminated Runway Performance Data"	Partially agree. Instead, revised heading to "Other Information," and moved the sentence below the heading as a lead-in to the criteria that follow.
37.	Page 9, below 7.3.3	the statement is missing a paragraph label, and the statement is incomplete		Please label the paragraph and complete the statement.	Partially agree. Numbered the paragraph but did not change the sentence. The sentence contains a subject and predicate; therefore, it is a complete sentence.
38.	Page 9, signature block	"END"		Since the signature block goes on the cover Page for this AC, the word "END" should be struck from Page 9.	Agree. Change made.
39.	Page A-1, Appendix A	at the very bottom of the page: the words under the "Name:" line do not belong		Strike all the words below the "Name:" line -- just above the page number "A-1" (do not strike the page number)	Agree. Also removed the "appendix" heading since the form should be an attachment to the AC, not an appendix. And deleted the page number accordingly.