

	AVS Quality Management System	QPM # AIR-001-007-F1	Revision 0
		Title: Document Review Log	Date: June 19, 2009

1. Document No.: Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"	2. Project Manager: Marc Bouthillier 781-238-7120	3. Reviewing Office: Eugene Triozzi, ANE-141 781-238-7120	4. Date of Review: 5/10/11	5. Date of Disposition: 5/20/11
		REVISION HISTORY		
		Rev	Description of Change	Effective Date
		0	Original	6/19/09



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8.	p. 15. para. 9.g.	The AC should include guidance to ensure that any special consideration allowing the use of marine/industrial/automotive-derived engines/parts will still allow for full compliance with part 43 and part 39 requirements.	In manufacture of new and spare parts, the quality of the parts remains the responsibility of the applicant (not the automotive/marine/manufacturer/supplier). During maintenance, any supplier must meet aviation requirements for replacement parts. In addition, any allowances made in the area of ICA must allow for full compliance with Part 43 and Part 39 (maintenance and airworthiness directive) requirements.	Add note to state that in the manufacture of new and spare parts, the quality of the parts remains the responsibility of the applicant (not the automotive/marine manufacturer/supplier). During maintenance, any supplier must meet aviation requirements for replacement parts. In addition, any allowances made in the area of ICA must allow for full compliance with Part 43 and Part 39 (maintenance and airworthiness directive) requirements.	The plan is to place this TCDS guidance in 4D. But until that occurs will stay in 2C as previously.
9.	p.23-25, para 11.o-p	Do the requirements of §33.95 and 33.96 apply to helicopter rotors as well as turboprop propellers?	In many cases, the droop control (rotor speed governor) in a helicopter arrangement resides within the engine control system.	If these regulations apply to helicopter rotors as well as propellers, so state in the AC and provide guidance on how to show compliance.	Disagree. Military parts governed by other regs and AC's Engine mission assumptions are in cert documents.

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10.	General	New engines are often so big that they must be partially disassembled for shipping. In addition, applicants may want to sell 'spare' core engines or fans and allow replacement of either on an airplane, rather than requiring engine removal, rebuild and test in a test cell. Applicants sometimes wish to ship engines (new or spare) with 'build-up' kits attached, included in Part 25 parts.	This comment has implications for 33.4 and also for 'export' requirements.	The AC should address guidance on what needs to go into the ICA, and any performance/operability requirements relating to shipping or installation of partial engines. I am not sure whether 'export' is a certification requirement or an Airworthiness requirement.	Disagree. This AC is only intended to provide guidance.
11.	General	Could any recommended words for surrendered TC be included in the AC?	Specifically what statement to use in the TCDS when a TC Holder surrenders its certificate when there are no engines in operation, or when there are still engines in operation.		Comment unclear and not totally applicable. However text revised to strengthen connection to TC holder responsibilities. This section does not refer to 3 rd party design and production approvals.
12.	General	Could there be any guidance about major/minor model designation?	If an applicant doesn't want to amend the TC for a model change, but they do want to identify the model in the ICAs, etc., is there no guidance regarding this issue?	Please see CAR C-10-894 for more background.	No change. Current rules are written for turboprops only. Turboshafts not applicable except by Spec Cond.

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1. Document No.: Draft AC 33-2C "General Type Certification Guidelines	2. Project Manager: Marc Bouthillier	3. Reviewing Office: Galvin Coimbre, AIR220, REVISION HISTORY	4. Date of Review: 3/30/11	5. Date of Disposition: 5/19/11
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for Turbine Engines”	781-238-7120	202-385-4209			
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	Page 1, paragraph 2. “Cancellation.” Also, throughout the entire document.	Suggest that the comma be placed before the quotation mark.	Grammar suggestion	Standard U.S. punctuation: Correct to read: AC 33-2B, titled “Aircraft Engine Type Certification Handbook,” dated June 30...	OK incorporated
2.	Page 2, item #4- “Related Document.”	Missing period.	Grammar suggestion	Place period after “Related Documents.”	OK incorporated
3.	Page 2, item #4- “Related Document.”	The FAA’s website referenced is not correct.	Incorrect reference to the FAA’s webpage.	The website listed references the GPO.	OK incorporated

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4.	Page 4, b. <u>Minor Change.</u>	Should this read "part 183 DER authority?"			OK deleted part 33
5.	Page 12, section 9(a) "Surplus Military Engines for Restricted Category Aircraft."	Incorrect section.	Section 21.25(a)(2) does not permit type certification of surplus military aircraft from the military	Change to Section 21.27, effective January 10, 1964, which permits such aircraft to be type certificated and to receive airworthiness certificates in the <u>standard category</u> , as stated on page 13, section 9(b).	OK text corrected to properly describe 21.25 restricted cat
6.	Page 24, (o)(3).	The fourth sentence in this paragraph that begins with the word "Negative" is split in two.	Grammar.	Bring the rest of the sentence that starts with 'torque... up one space and position it after the word "Negative" for a complete sentence.	OK incorporated
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1. Document No.: Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"	2. Project Manager: Marc Bouthillier 781-238-7120	3. BOS-AEG, Gilbert J. DaCosta, (781) 238-7887	4. Date of Review: May, 2011	5. Date of Disposition: 25 May 11
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- **Concur but Outside of Scope (Will be considered in next change/revision); or**
- **Answer to Question or Statement.**

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1.	Page 8, Paragraph (7) <u>Oil.</u>	This does not address oil consumption.	Not sure why it is not addressed.	In this paragraph (7) cite that the following have to be included in the TCDS: 1) oil consumption limits, 2) that the limits are not to be increased (<i>if this is the case</i>) and 3) that the limits may be increased (<i>if this is the case</i>) and how an increase may be done - citing any applicable restrictions e.g., not to exceed 10%. This is particularly important because of ETOPS.	Disagree. Not an op limit and not a parameter used for basic part 33 cert. Not listed currently as a min TCDS content item. This is a maintenance parameter that will change over time.
2.	Page 11, Note 11	Cites to document ETOPS eligibility in this TCDS note. This is the only area in the AC that ETOPS is addressed. Notwithstanding AC 33.201-1, something should be documented in this AC regarding applicants having to 'apply' for ETOPS eligibility or 'declare' this intent.	To recognize that applicants need to apply for ETOPS eligibility preferably in the Cert. Plan. In doing so all items required by the CFR and recommended by AC 33.201-1 will be identified and discussed early on.	Include something in Paragraph 11. PART 33 GUIDANCE MATERIALS (page 16) about this and include a reference to AC 33.201-1.	Disagree. Table 1 Note 11 covers ETOPS eligibility to the extent needed in this AC. The text was revised here to be clearer about eligibility data. Also, the part 25 regs drive the engine applicant to apply for eligibility to support the aircraft program.

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3.	Page 16, Paragraph 11 PART 33 GUIDANCE MATERIALS	This AC does not cite any reference to the regulations regarding ETOPS eligibility because they are discussed in AC 33.201-1.	This AC is not intended in part to address those sections of part 33 that have ACs.	Since AC 33.201-1 is fairly new and has been applied in a few recent type certification applications, it is recommended that AC 33.201-1 be reviewed against experience to date. If there is additional information of an advisory nature that would be useful, it is recommended that consideration be given to adding this information (and a reference to AC 33.201-1) in this AC.	Disagree. Over time any needed changes to required guidance would be done by revision to AC 33.201, not in this AC.
4.	Page 19, Paragraph g. <u>Section 33.67 – Fuel System.</u>	Although not required by 33.67 an evaluation should be done to determine if anything could be cited in this AC regarding: 1) placement of the fuel flow meter (FFM), 2) un-be-known loss of fuel prior to the FFM and 3) the Low Fuel Alert concerns of ANM and EASA.	To provide advisory information of a significant safety concern regardless part 33 specific requirements.	Include something regarding this topic in this paragraph or elsewhere in this AC. Or at least make reference to any transport regulations and/advisory material in this AC.	Disagree. Low fuel alert is a part 25 level issue. This AC only deals with engine basic. Details of safety concern not cited. This AC is for type cert compliance work, not COS.

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5.	Page 23, Paragraph n.(1)	Demonstration of start characteristics is most likely conducted by manual shutdowns and restarts. The purpose of this testing is primarily to ensure that the engine will start in the declared starting envelop. There's not a requirement specifically cited in part 33 to address satisfactory auto relight and continuous ignition capabilities (<i>if so designed</i>) - this may be covered by the Section 33.75 Safety analysis including the Section 33.28 SSA for the control system.	Even if the reliability of these capabilities falls under the safety requirements, and their demonstration is part of operation testing, something should be cited in this AC on this subject (<i>at least possibly by reference</i>). This is of particular interest because of certain dual engine events that have occurred over the last several years and the concerns identified in draft AC 20-147A, Turbojet, Turboprop, Turboshaft, and Turbofan Engine Induction System Icing and Ice Ingestion.	If and where appropriate, include something in this AC as described.	Disagree. Comment not clear. Actual in-flight start testing is done at aircraft level, engine basic only provides an envelope. Auto-relight is optional and would be evaluated during environmental threat tests. This AC is not intended to cover this subject.
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1. Document No.: Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"	2. Project Manager: Marc Bouthillier 781-238-7120	3. Reviewing Office: ANM140L Reviewer's Name & phone #: JGC 562-627-5246	4. Date of Review:	5. Date of Disposition:
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- Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	Pg. 3 Para 7	Please state why "major" chg re-definition is necessary under part 33; Does ANE wants the re-definition to be a more decisive definition?	Typically major chg interpretation is needed for delegation purposes; Part 21.93 is very encompassing and challenges the designee to think broadly	Use definition in part 21.93 and if in doubt whether chg is "major", ask the local ECO/ACO;	Disagree. More detail needed for engines. No changes.
2.	Pg. 3 Para 7.a.	Not sure why "major" chg this is discussed under Part 33	"major" chg is a part 21 issue	Don't discuss it; use definition in part 21.93	Disagree. More detail needed for engines. No changes.

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3.	Pg. 3 Para 7.a.	Refined major chg definition not necessary	Refined definition may distract from intent of part 21.93; For example: 7.a. (3) every change to a manufacturing process is not a major chg or every change that affects containment capability is not a major change	Use definition in part 21.93; stay focused	Disagree. More detail needed for engines. No changes
4.	Pg. 4. Para. 8	Part 33.7 requires certain data (ratings and safe operating limitations) in the TCDS; Pls state why much more data (other than ratings and safe operating limits) are required in the TCDSs? Examples: Description of engine model; description of control system; reduction gear ratio; principal dimensions; center of gravity; certification basis; production basis; and a number of notes are beyond the basic reqmts	Unknown reason (Is it because TCDS is a public document and the FAA would like more info presented to public)	Keep the TCDS as clean an short as possible; don't make it read like the Installation Manual	Disagree. AC text reflects our standard practice for decades, nothing new. A variety of pertinent info has proven useful over time.



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5.	Pg. 19 Para 11.f.	Restrictions in IM and TCDS: Should bleed restrictions be added to the TCDS if controlled by the FADEC	Bleed restrictions are operating limitations but this is a lot of information to include in the TCDS	Keep the TCDS as clean as short as possible; don't make it read like the Installation Manual	Disagree. Carryover from 2B. Text revised to improve clarity.
6.	Pg 23 Para 11.n.	Operation test should be broken out into its own AC	There should be enough advisory information to warrant a separate AC; For example, engine relights are not tested at full power at altitude for reason that they may damage engine seals during transients and affect performance; may be influenced similar to rotor lock	There must be many more specific examples for best practices AC	Agree a separate AC is desirable. A new AC project is low priority at this time. No changes.
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Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"		Marc Bouthillier 781-238-7120	Reviewer's Name & phone #: <i>ACE-114</i> Mark S. Orr, 816-329-4151 Jeff Englert 316-946-4167 - <i>ACE-116W</i>	25 Apr. 11	19 May 2011
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	General	The AC references FAA Order 8110.4C throughout, including references to specific paragraphs in the Order. This Order is currently undergoing an extensive rewrite that could impact this AC.	8110.4 is being extensively rewritten for revision D and this will most likely change the references to 8110.4C made in this AC.	Coordinate release of this AC with 8110.4D	Disagree. Cannot accommodate and do not know what 4D changes will be.



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2.	General	Dorina Mihail was working a business plan item concerning "ratings". Does this guidance conform to the work being done for the business plan item?	Include the results of recent work being done in the area of ratings.	Coordinate with Dorina Mihail about specifying "ratings".	Disagree. Ratings guidance will come under a separate AC
3.	Page 1, ¶ 1 M. S. Orr, 816-329-4151	The first sentence (and the subject) state this is guidance for turbine engines, yet it also covers reciprocating engines	Purpose & subject do not match content.	Revise to include reciprocating engines.	Disagree. Subject and Purpose are the same. Receipts not covered by this AC except for TCDS content info. which is temporary until §110.4 is updated.
4.	Page 6, ¶ 11 M. S. Orr, 816-329-4151	The last sentence appears to be a combination of two different sentences.	Clear writing.	Revise sentence to delete ", are not addressed by this AC"	Agree. Text revised.
5.	Page 16, Para. 11. Jeff Englert 316-946-4167	The revision removes a number of guidance discussion sections for certain part 33 paragraphs (ex: 33.3, 33.4, 33.7, 33.15, 33.17, etc.) without any justification comments. Reasons for removal are not obvious.	Some of the guidance provided within these deleted sections could be considered valuable. How does the applicant gain from less guidance?	Provide a rationale that establishes reasonableness of deletion strategy.	Disagree. The lead in sentence to Para 11 has an explanation as to why some regs are not covered in this AC.
6.	Page 16, Para 11. Jeff Englert 316-946-4167	In some cases the regulation intent is modified somewhat.	A regulation's intent is usually clarified or defined as part of the regulation's preamble, redefinition without a rule change may not be best method.	Indicate where intent is specified or defined to justify changes.	Disagree. Regulatory intent not changed, just clarified.

1. Document No.: Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"	2. Project Manager: Marc Bouthillier 781-238-7120	3. Reviewing Office: AFS330 Nick Pearson @ 404-474-5421	4. Date of Review: April 2011	5. Date of Disposition: 20 May 11
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.	Pg 2, 3b	Last phrase in sentence not required.	The FAA does not need to state this fact with the last part of the sentence inserted.	Change sentence to read: If we find that following this AC would not result in compliance with the applicable regulations, the FAA may require additional substantiation as the basis for finding compliance.	Not concur. Sentence is required boilerplate.
2.	Pg. 12, 9a(2)	(2) The applicant must identify in the airworthiness limitations section of the aircraft ICA and the life limits and inspection intervals applicable to the engine life limited parts, see Order 8110.56 to learn how to determine life limits and prepare the ICAs.	Run on sentence and not clear. Delete 'and' after ICA and parenthesis rest of paragraph starting with 'see.'	The applicant must identify in the airworthiness limitations section of the aircraft ICA after the life limits and inspection intervals applicable to the engine life limited parts (see Order 8110.56 to learn how to determine life limits and prepare the ICAs).	Concur.
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1.	Page 4, Paragraph 7 (Randy Petersen)	Add a statement at the end of paragraph 7 that adds the 21.101 requirement.	Defines additional requirements for major type design changes. Also defines the process for determining the certification basis.	Add "c" at the end of paragraph 7: c. Major design changes are further classified as significant and not significant. Reference AC 21.101-1A for information pertaining to the determination of the level of significance and the requirements necessary for defining the certification basis for these design changes	Agree. New section added to mention 21.101.
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2.	8g (Ed Chalpin)	The document should note the proper duration 21.51 states of a TC, Suspended, Revoked, or surrendered.	14CFR 21.51 only indicates the following situations: Suspension, Revocation or Surrender. Canceled is not mentioned.	g. <u>Surrendered or Revoked TC and Obsolete Engines.</u> When a model approved TC is surrendered, revoked, the certificate and TCDS will be revised to reflect the change in TC status. Follow the process with the to complete the state and/or life cycle of the certificate.	Agree. Text revised to add these thoughts.
3.	9d (Ho-Joon Lim)	Does approved TC holder service document mean that the document was FAA approved?	Does ACO/Directorate need to agree with service document authorizing the change from military to civilian?	ACO/Directorate should answer whether they need to be involved or not.	Text revised to be clear that an FAA approved document is needed. Directorate involvement not needed; approved data.
4.	9f (Ho-Joon Lim)	Is the import of surplus or active foreign military engines really allowed for all experimental aircraft?	Could the engines then go on experimental aircraft for showing compliance or crew training?	Either specify or don't mention the experimental portion.	Agree. Experimental reference deleted.
5.	Page 4, Para 7.a.(8) (Pong Lee)	Just the word "Affect" is too broad and can be too restrictive to be useful here.	Not all things affecting an airworthiness directive is considered a major change in type design.	Suggest elaborate a little further on what is meant by "affect".	Agree. Narrowed down to applicability and requirements.

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6.	Page 4, Para 7.b. (Pong Lee)	Stating that everything else other than the items in 7.a. is a minor change could restrict the ACO's decision-making process and possibly backfire.	The list of items in Para 7.a. can never be inclusive. There will always be items outside of this list (new items or items missed here) that are major changes to type design.	Suggest making a disclaimer that the list in Para 7.a. is not inclusive, and that items outside of this list may be major changes unless proven otherwise.	Agree. Disclaimer added.
7.	Paragraph 5 Related reading material (ky Ngo)	Paragraph 7 of this AC mentioned Change to type design but not offering related existing reading material	Additional information	Add to paragraph 5: AC 21.101-1A Establishing Certification basis of changed Aeronautical products.	Disagree. AC 21-101 is mentioned elsewhere in this AC now
8.	Paragraph 8. TCDS Content (Ky Ngo)	TCDS is an FAA document. Instruction in how to write this document should be in an Order (such as 8110.4), not in an AC which is targeting applicant.	Appropriate location of information.	Remove detailed instructions of how to write TCDS from this document.	Disagree. We do plan to put this info in 8110.4 but until that happens this info will stay in this AC as before.
9.		Page 19, e.(1)(b): AC 33.28-1 title should read "Compliance Criteria for 14 CFR § 33.28, Aircraft Engines, Electrical and Electronic Engine Control Systems." The word "Engine" was omitted from Electronic Engine Control Systems. (Tonkins)			Agree.

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10.		Page 20, 1. The correct title for Section 33.84 (14 CFR 33.84) is "Engine Overtorque test" not "Engine Overtorque." (Tonkins)			Agree
11.		Appendix not attached to the document for review. (Tonkins)			Disagree Comment not clear

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1. Document No.: Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"	2. Project Manager: Marc Bouthillier 781-238-7120	3. Reviewing Office: Reviewer's Name & phone #: Jurgen Priester 817-222-5159	4. Date of Review:	5. Date of Disposition:
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- Non-Concur;
- Concur but Outside of Scope (Will be considered in next change/revision); or
- Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
	Thru out AC	References to reciprocating engines.	This AC is for Certification Guidelines for Turbine Engines	Remove all references in this AC to reciprocating engines.	

Clearance Record

DOCUMENT COMMENT LOG

Originating Office: ANE-111	Document Description: General Type Certification Guidelines for Turbine Engines	Project Lead: Judith Watson	Reviewing Office:	Date of Review:
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Commenter	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
E.Haight, ASW-111, Comment #1	Pg. 4, Paragraph 8.	To clarify between Engine and Aircraft TCDS, Add Engine to the Paragraph 8. Heading.	It is clear that this draft AC applies to engines, but there are Engine and Aircraft TCDS's. To be clear the word "Engine" should be added to the Section 8. heading.	Change Paragraph 8. heading from, "Type Certificate Data Sheet (TCDS) Content...", to, " Engine Type Certificate Data Sheet (TCDS) Content...".	No. AC title and clearly applies to engines only.
E.Haight, ASW-111, Comment #2	Pg. 6, Para. e. 2)(b)	Remove reciprocating engine information.	Document applies only to turbine engines, so reciprocating engine information should be removed.	Remove section e. (2)(b) <u>Reciprocating. Number of cylinders,</u>	No. All TCDS info will ult. go into EUC 40, but until that date will remain in AC.
E.Haight, ASW-111, Comment #3	Pg. 6, Para. e. (3)	Remove reciprocating engine information.	Document applies only to turbine engines, so reciprocating engine information should be removed.	Remove last sentence of section e. (3), which states, " <u>For reciprocating engines, identify make and model ...</u> "	No. See above.
E.Haight, ASW-111, Comment #4	Pg. 6, Para. e. (4)(d)	Remove reciprocating engine information.	Document applies only to turbine engines, so reciprocating engine information should be removed.	Remove section e. (4)(d), Titled, " <u>For Reciprocating Engines.</u> ", and revise to remove reciprocating engine information, to address turbine engines only.	No. See above

Commenter	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
E.Haight, ASW-111, Comment #5	Pgs. 10 & 12. Para. f. Tables 1 and 3	Remove reciprocating engine information.	Document applies only to turbine engines, so reciprocating engine information should be removed.	Modify Table 1, Note 1 (g) from, "Tractor or pusher installation (reciprocating engines).," to "Tractor or pusher installation (reciprocating engines). Delete text and items a., b., c., and d. in Table 1, Note 2, that states, " For Reciprocating Engines: a. ". Delete Table 3. (Additional Notes Applicable to Reciprocating Engines.). I am not recommending deleting Notes 19-21, as they may be appropriate for turbine engines, but may need to be moved to a different Table in the document.	<i>No See above</i>
T. Millard, ASW-110, Comment #6	Pg. 13, Para. 9. b. (Surplus Military Aircraft Engines and Parts)	Revise sentence related to Surplus Military Aircraft for Normal Category Aircraft.	CFR 21.27(a) states that, "...an applicant is entitled to a type certificate for an aircraft in the normal, utility, acrobatic, commuter, or transport category ...", not just for a Normal category aircraft.	Change title from, "Surplus Military Engines for Normal Category Aircraft", to "Surplus Military Engines for Other Than Restricted Category Aircraft", since 21.27 applies to Normal, as well as Utility, Acrobatic, Commuter, and Transport category aircraft. Also change 1 st sentence from, "Section 21.27 allows type certification of surplus aircraft from the U.S. Military, including the installed engine(s) under normal category.", to, "Section 21.27 allows type certification of surplus aircraft from the U.S. Military, including the installed engine(s) under normal , utility, acrobatic, commuter, or transport category.".	<i>Not clear on comment applicability. Will re-review 21.25 vs. 21.27 criteria as part of public comment phase. No changes at this time. Will re-visit prior to final issue.</i>
T. Millard, ASW-110, Comment #7	Pg. 14, Para. 9. c. (New Engine Certification and Production Using Military Surplus Parts.)	Modify as shown.	Typo and additional clarification recommended.	1 st Sentence: Change, "approve", to, "approved". After 1 st sentence add the following sentence: " However, prior to acceptance for use in production by a TC or PC holder, used engine parts must be inspected and found to be in conformity to all applicable TC holders' type design data. "	<i>Concur in part. This is a bigger issue that has the policy issued. Will re-visit prior to final issue to determine what level of guidance is appropriate for this top level. No changes at this time</i>

1. Document No.: Draft AC 33-2C "General Type Certification Guidelines for Turbine Engines"	2. Project Manager: Marc Bouthillier 781-238-7120	3. Reviewing Office: ASW110/111 Haight & Millard	4. Date of Review: May 2011	5. Date of Disposition: 20 May 2011
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.					Disagree. AC titled clearly to be applicable to engines only.
2.					Disagree. All engine TCDS info will ultimately go into Order 8110.4D. Until that time this info will reside in 2C as previously.
3.					Disagree. All engine TCDS info will ultimately go into Order 8110.4D. Until that time this info will reside in 2C as previously.
4.					Disagree. All engine TCDS info will ultimately go into Order 8110.4D. Until that time this info will reside in 2C as previously.
5.					Disagree. All engine TCDS info will ultimately go into Order 8110.4D. Until that time this info will reside in 2C as previously.
6.					Not clear on comment applicability to this high level AC. Will re-review the differences between 21.25 and 21.27 as part of the public comment phase and make any needed changes before final issue. No changes at this time.
7.					Concur in part. This is a larger issue that has HQ policy issued. Will re-review as part of public comment phase work, to determine what level of guidance is appropriate for this high level AC. No changes at this time.