

**Disposition of Public Comments
AC 25.795-6X
Least Risk Bomb Location**

Comment	Requested Change	Disposition
Boeing		
<p>Paragraph 8.a.1.(a). The word “must” implies a requirement, which is not consistent with advisory material. Additionally, given the undefined magnitude of the explosion, it is unclear how to show that cracks in the blowout section cannot propagate.</p>	<p>Revise this paragraph to read as follows:</p> <p><i>“The LRBL fuselage-skin blowout area must <u>should</u> be discontinuous from the surrounding structure, so that cracks developed in the blowout section cannot <u>are unlikely to propagate into the surrounding structure.</u>”</i></p>	<p>A discontinuity in the structure surrounding the LRBL is essential when the LRBL is at the fuselage skin. The paragraph is clarified to specify when this criterion applies. .</p>
<p>Paragraph 8.a.2. The location of the LRBL should be based on the <u>primary</u> effects (i.e., capability for continued safe flight and landing), not on the secondary effects.</p>	<p>Revise this paragraph to read as follows:</p> <p><i>“The location of the LRBL should be based on considerations of <u>consider</u> the secondary effects, including structural losses, ingestion of debris into the engine, large mass strikes on the tailplane, smoke or fire, or hazards to passengers.”</i></p>	<p>The focus should be on primary effects but we agree that secondary effects should also be considered and have modified the paragraph accordingly.</p>
<p>Paragraph 8.a.3. The 18-inch criterion is too prescriptive and is based on an undefined event (i.e., a bomb of undetermined energy). The distances have not been confirmed as achievable within certain configurations that are driven largely by safety separation requirements and have not been verified as a method of compliance with the associated rule.</p> <p>In addition, the stay out zone criteria are</p>	<p>Delete this section of the AC, or replace it “with an ‘objective’ that balances the LRBL requirement with existing safety (system separation) requirements, based on individual manufacturer aircraft design practical solution(s).”</p>	<p>The Harmonization Working Group agreed to use these criteria as guidance. The tests used to derive these criteria are security sensitive information, so we cannot provide more detail. Members of the Harmonization Working Group had access to the security sensitive information when developing this AC.</p>

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too prescriptive.		
<p>Paragraph 8.a.5. The criteria are too prescriptive and are based on a non-specific event (i.e., a bomb of undetermined energy). The distances have not been confirmed as achievable within certain configurations that are driven largely by safety separation requirements. The weight estimate contained within the economic analysis is significantly understated.</p>	Delete this entire section or validate the technical performance of the 0.09-inch thick aluminum as an alternative.	The Harmonization Working Group agreed to use these criteria as guidance. The tests used to derive these criteria are security sensitive information, so we cannot provide more detail. Members of the Harmonization Working Group had access to the security sensitive information when developing this AC. In addition, this approach is an alternative to simply avoiding the LRBL when routing critical systems.
<p>Paragraph 8.c. It is unclear what role this information plays in a Part 25 advisory circular. If this statement is intended as guidance for crew procedures, it should be stated as such. Additionally, there is no supporting data provided to justify the statement “extremely effective.”</p>	Delete this entire section.	The AC also references part 121, and this information is important to the overall effectiveness of the LRBL and associated procedures. The supporting data are security sensitive information but support the statement of effectiveness. Members of the Harmonization Working Group had access to the security sensitive information when developing this AC.
<p>Paragraph 8.f. Clarify the AC to indicate that performance of the LRBL need not be verified. Testing to verify performance to requirements cannot be accomplished without performance requirements.</p>	Revise this paragraph to read as follows: “8.f. Destructive <u>Testing</u> is not required. ”	The intent of the word “destructive” is to make it clear that literal performance of the LRBL is not required to be shown by test. However, other tests may be associated with the LRBL, depending on the design solution chosen. To make the AC clearer, we have revised the paragraph to read, “Effectiveness of the LRBL does not need to be verified by test.”

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Transport Canada		
Include fuel systems as things to keep clear of the LRBL.	The AC should mention the fuel system as a system that should be remote from the LRBL	We agree and have revised Paragraph 8.a.3. accordingly.
AirTran Airways		
Expand proposed § 121.295.	Proposed § 121.295 should be expanded to state that the manufacturer of an airplane model is responsible for determining and providing to the operator the least risk bomb location (LRBL) for that model.	We have revised the AC to emphasize the need for close coordination among all affected parties.
ICCAIA¹ and Bombardier		
Paragraph. 8.b. This section states that the a containment system is another acceptable way to meet the intent of the rule. However, it does not define any design standard for the containment system.	There should be criteria for a containment system to meet the LRBL requirement, i.e., the size of the charge to be mitigated.	As noted in the AC, any such proposal will have to be coordinated with the FAA. The information that the commenters request is security sensitive and cannot be publicly released. Should an applicant propose a containment-based LRBL, the FAA will work with TSA to establish the appropriate performance measures.

¹ International Coordinating Council of Aerospace Industries Association