

DISPOSITION OF FAA COMMENTS

AC 25.621-X, Casting Factors
Prepared by Todd Martin, ANM-115

No.	Comment	Requested Change	Disposition
Commenter: Gregory (Keith) Noles, ACE-117A			
1	Will AC 25-21 be revised to reference and incorporate the changes in the new AC for 25.621?	Complementary revision to AC 25-1.	We have no plan to update AC 25-21, Certification of Transport Airplane Structure, at this time; however, we recognize the need to update that AC.
2	Clarification of Subparts regarding “and” versus “or.”	Are subparts (i), (ii), (iii) of proposed 25.621(c)(1) logical “and” or “or”?	Items (i), (ii), and (iii) are required, so “and” rather than “or” would be most correct. However, it’s not necessary to state “and” in the rule. No change.

No.	Comment	Requested Change	Disposition
Commenter: Ivan Li, ANM-100B			
1	Section 5, “General Guidance for Casting Factors.” First sentence states that “...the ultimate load level must include limit load multiplied by the factor required by § 25.619.” This sentence may lead to confusion that the 1.5 safety factor per § 25.303 is not required.	Clarify.	Agreed. This paragraph is revised to clarify.

No.	Comment	Requested Change	Disposition
Commenter: Wayne A. Tonkins, AIR-103			
1	14 CFR 25.621(d)(5) is cited in the document but is not found in the CFR.	Request, check the citation and make appropriate changes to the citation.	The NPRM contains this new subparagraph.

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2	Typo on page 4 in the NPRM. Item “F” appears twice.	Request, delete one “F” from the column.	The NPRM has already been fixed.

No.	Comment	Requested Change	Disposition
Commenter: AIR-220			
1	Page 2, paragraph 4, Definitions.	Suggest moving the definition of “casting” as it appears on page 3, paragraph 6(b) and placing it under the definition section.	Agreed. Definition of “casting” added to definitions section. Also retained in 6b.
2	Page 6, paragraph 4, Inspection program for test casting.	Suggest adding ISO 4986, Steel casting - Magnetic particle inspection to the list of acceptable industry guidance publications.	Agreed. Reference added.

No.	Comment	Requested Change	Disposition
Commenter: Angeline Garrett, AIR-500			
1	Global change. Incorrect formatting. Only the first two levels of a paragraph should be bold.	Remove the bold from all subsection numbers and letters beyond the second level of the paragraph.	We agree and have revised the AC accordingly.
2	Global change. Refrain from using bullets. Bullets can be difficult to reference.	Remove bullets and replace with a letter or number accordingly.	We agree that bulleted lists should be used sparingly and with discretion, but disagree that they should not be used at all. A bulleted item could

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			easily be referenced as, for example, “the first bullet item of paragraph 7b(4)(c).” Further, in previous teleconferences with AIR-500, it was agreed that it was allowable to use bulleted lists in an AC, as long as the list did not constitute complete sentences. We have followed that guidance in this AC. No change is necessary.
3	Under Subject Area, Page 1. Missing black line. Non-compliance format of Order 1320.46C.	Place a black line above the “Purpose” title.	We agree and have revised the AC accordingly.
4	Paragraph 3a –f, Page 2. Incorrect alignment.	Move the labeling of the subparagraphs to align directly under the first term in the main paragraph title.	We agree. Paragraphs 3a through 3f were accidentally formatted to level 3 instead of level 2. We have corrected the format.
5	Paragraph 5b, 1st sentence, Page 2. Delete the semicolon after the term “methods” and replace with a period. Begin a new sentence after the term “methods.”	Rewrite to read: ...or equivalent inspection methods. The inspection may be limited to the structurally significant internal areas and areas where defects are likely to occur.	We disagree. A semicolon can be used to conjoin two independent clauses that are closely related. This is simply a style choice of the authors. However, we have deleted this paragraph from the AC altogether.
6	Paragraph 6a(2), 1st sentence, Page 3.	Delete the parentheses found around the title “Casting factors.” Replace parentheses with commas.	We agree and have revised the AC accordingly.
7	Paragraph 6a(2), 1st sentence, Page 3.	Delete the parentheses found around the title “Factors of safety.” Replace parentheses with commas.	Same as comment 6.

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8	Paragraph 6b(1), 1st sentence, Page 3.	Delete the parentheses found around the title “Special factors.” Replace parentheses with commas.	Same as comment 6.
9	Paragraph 6b(1), 2nd sentence, Page 3.	Delete the parentheses found around the title “Material strength properties and material design values.” Replace parentheses with commas.	Same as comment 6.
10	Paragraph 6b(1), 2nd sentence, Page 3. Inconsistent with the rest of the document.	Place the title “Material strength properties and material design values” in italics.	We agree and have revised the AC accordingly.
11	Paragraph 7b(4)(c), 2nd sentence, Page 6. Missing comma.	Place a comma after the term “list.”	We agree and have revised the AC accordingly.
12	Paragraph 7b(4)(c), 2nd sentence, Page 6. Improper usage of a colon.	Delete the colon after the term “guide.” Replace with a period.	Disagree. The colon is used correctly for presenting a bulleted list of reference material that follows.
13	Page 10. Missing signature block.	Place a signature block five spaces after the last paragraph of the document.	Disagree. The signature block should only appear in the final AC. Instead the word “END” is used in its place, so the reader understands that the last page of the AC guidance has been reached.
14	Page 10. Incorrect format.	Delete the term “END” at the bottom of the page.	Disagree. The word “END” is used to notify that reader that the last page of the AC guidance has been reached.