

DISPOSITION OF PUBLIC COMMENTS

AC 25.415-1, *Ground Gust Conditions*

Prepared by Todd Martin, ANM-115

No.	Comment	Requested Change	Disposition
	Commenter: Boeing		
1.	<p>As written, the proposed AC would require the airplane to be parked with controls locked. Our suggested revision clarifies that the controls do not necessarily have to lock when the airplane is parked.</p> <p>Additionally, our suggested additional sentence at the end of the paragraph would ensure that the AC reflects the latest design and certification of new transport category airplanes.</p>	<p>We suggest revising the AC text as follows:</p> <p><i>“5.1 The ground gust requirements take into account the conditions of the airplane parked with controls locked or unlocked, and taxiing with controls either locked or unlocked. In either of the locked conditions, the control surface loads are assumed to be reacted at the control system locks. In the unlocked condition, the pilot is assumed to be at the controls, and the controls are assumed to be powered, if applicable. In the latter condition, the control surface loads are assumed to be reacted, if necessary, at the flight deck controls by the pilot(s) up to the limits of the maximum pilot forces and torques given in § 25.397(c). In the unlocked and parked condition, and for airplanes with a fly-by-wire (FBW) control system, the control surface loads, including the dynamic effects, are reacted and/or limited by the actuation system and the structures in the actuation load loop.”</i></p>	<p>We partially agree.</p> <p>As proposed, § 25.415 would require that the airplane be evaluated while taxiing with the controls locked and unlocked, and while parked with the controls locked. However, as the commenter points out, many transport category airplanes with powered flight controls do not have control system gust locks. As noted in the notice of proposed rulemaking, these airplanes rely on their hydraulic actuators to provide protection from ground gusts. We therefore revised § 25.415 to clarify that, for all airplanes, the ground gust conditions must be considered while taxiing and while parked. For airplanes that include control system gust locks, the taxiing condition must be evaluated with the controls locked and unlocked, and the parked condition must be evaluated with the controls locked. Airplanes not equipped with gust locks are to be evaluated in their normal configuration while taxiing and while parked.</p> <p>With these changes to § 25.415, the rule will no longer be technically harmonized with CS 25.415. However, we believe the intent is</p>

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			<p>the same.</p> <p>To align with the new rule wording, corresponding changes have been made to the advisory circular (AC). We don't agree with the specific AC wording change proposed by the commenter, but we believe the rule change and other AC changes address the concern raised by the commenter.</p>