



# Federal Aviation Administration

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## Memorandum

Date: February 9, 2016

To: Manager, Boeing Aviation Safety Oversight Office, ANM-100B

From: Manager, Transport Airplane Directorate, ANM-100

Prepared by: John Hed, ANM-100B

Subject: INFORMATION: Equivalent Level of Safety (ELOS) Finding for  
Vibration/Buffering Compliance Criteria, Taxi Aid Camera and Entertainment  
Camera Modifications to Boeing 787 Aircraft, FAA Project Number TS15-0029

ELOS Memo #: TS15-0029-F-1

Regulatory Ref: § 25.251(b)

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This memorandum informs the certificate management aircraft certification office of an evaluation made by the Transport Airplane Directorate (TAD) on the establishment of an equivalent level of safety (ELOS) finding for the installation of a taxi aid camera and entertainment camera modifications to Boeing 787 Aircraft.

### Background

The applicant proposes installation of a taxi aid and entertainment camera and illuminator system comprised of several external installations on the fuselage and empennage of the aircraft. Compliance must be shown to Title 14, Code of Federal Regulations (14 CFR) 25.251(b), which states that each part of the airplane must be demonstrated in flight to be free from excessive vibration under any appropriate speed and power conditions up to VDF/MDF. The applicant requests the use of an ELOS to show by means other than flight testing that the installation of the taxi aid and entertainment camera modifications would not cause excessive vibration under any appropriate speed and power conditions up to VDF/MDF.

The means of demonstrating compliance with § 25.251(b) is cited in the rule (“each part of the airplane must be **demonstrated in flight** to be free from excessive vibration under any appropriate speed and power conditions up to VDF/MDF”). Therefore, a flight demonstration out to VDF/MDF is required to demonstrate compliance with the rule.

When external modifications are made to an existing type design, compliance with § 25.251(b) must be addressed. The FAA has determined that if it can be shown by an acceptable method that the original compliance finding for this rule remains valid (i.e., no vibration/buffet issues exist due to the change), an equivalent level of safety has been shown. However, if the original certification for this rule does not remain valid due to potential effects of the external modification, direct compliance with the rule must be re-demonstrated.

**Applicable regulation(s)**

§ 25.251

**Regulation(s) requiring an ELOS finding**

§ 25.251(b)

**Description of compensating design features or alternative standards which allow the granting of the ELOS (including design changes, limitations or equipment need for equivalency)**

For an external modification to an existing approved design, such as the one proposed, an evaluation must be performed to determine whether or not the modification could affect compliance with § 25.251(b). If the evaluation cannot show that compliance with § 25.251(b) would not be affected, then compliance must be re-demonstrated, and the only means for accomplishing this is by an in-flight demonstration at speeds up to VDF/MDF.

To evaluate whether the modification could affect the original compliance finding, the applicant may propose to use any suitable combination of the following:

1. Similarity to other approved designs. (Consider the size, shape, and location of the respective modification, the airplanes they are installed on, the respective VDF/MDF speeds, and the method of compliance used for the approved designs.)
2. Flowfield analysis using an acceptable computational fluid dynamics (CFD) tool. The applicant must show that the tool is valid for its intended use. For example, the tool must be capable of accurately assessing whether a shock is present, including its strength and location, and the area of separated flow. Generally, a full Navier-Stokes code with robust turbulence modeling is needed for such an analysis. Validation using flight test data is preferred, but suitable wind tunnel data may be acceptable. The applicant should also address other known limitations and characteristics of the code to be used, such as:
  - a. Grid sizes and spacing.
  - b. Geometric fidelity of the airplane model – the effect of simplifications of the model (e.g., ignoring flap track fairings, vortex generators, small gaps, etc., how the engines are modeled, aeroelastic effects, other differences between the actual airplane and the digital model used in the analysis).
  - c. CFD modeling errors, particularly in turbulence modeling.
  - d. Location of the trip point from laminar to turbulent flow.
  - e. Boundary conditions (e.g., ensuring that far field conditions are applied sufficiently far away).

3. A vibration analysis, usually based on the results of the flowfield analysis addressed in (2).
4. Flight testing to a speed from which the analyses described in this paragraph can be used to extrapolate the findings to VDF/MDF. As a minimum, flight testing must be conducted to at least VMO/MMO.

### CFD Code Validation

To use a CFD tool in showing that the modification does not affect compliance with § 25.251(b), the tool, the applicant should show that the tool is valid for its intended use. The CFD tool needs to be capable of accurately assessing whether a shock is present, including its strength and location, and the area of separated flow. Generally, a full Navier-Stokes code with robust turbulence modeling is needed for such an analysis. Validation using flight test data is preferred, but suitable wind tunnel data may be acceptable.

### Code validation includes:

- Showing that the code accurately models flow phenomena of interest (e.g. transonic shocks, shock induced flow separation, shock-boundary layer interaction and separated flows) that may result from the modification.
- Showing that the person/organization performing the analysis is experienced and qualified to properly run the code and interpret the results.

The accuracy of the modeling of the flow field phenomena of interest should be demonstrated by comparing flow field characteristics (e.g., pressure distributions, shock strength/location, etc.) predicted by the model to flight test or wind tunnel data for a configuration (including shape, location, and airframe) similar to the modification being evaluated at airspeeds up to VDF/MDF. In addition, if there are no significant flow field phenomena of interest (e.g. transonic shocks, shock induced flow separation, shock-boundary layer interaction and separated flows) shown with the configuration being evaluated, a comparison should be made to another configuration that does exhibit such phenomena. Validation depends on the flow phenomena of interest being present to show that the code will accurately model such flow phenomena. Known limitations and characteristics of the model should be addressed, such as grid sizes and spacing, geometric fidelity of the airplane model, turbulence modeling fidelity, boundary conditions, and strength and location of shocks/ recovery.

The test cases used to validate the code should be agreed to in advance by the FAA.

### Aerodynamic Analysis:

An aerodynamic analysis using the validated code may be used to show that compliance with § 25.251(b) will not be affected by the modification provided the code validation has been accepted by the FAA.

The aerodynamic analysis need not cover all flight conditions. The critical flight conditions should be identified and those that need to be analyzed in detail selected. The applicant should document how these critical flight conditions have been identified.

The applicant should analyze the effects of all simplifications or assumptions applied to the aerodynamic model (i.e., the analytical representation of the modified and unmodified airplanes) and show that these simplifications would not lead to an inappropriate conclusion.

After FAA acceptance of both the code validation and the results of the aerodynamic analysis, it is not required to perform a flight test to VDF/MDF to show that the modification did not affect compliance with § 25.251(b). However, a flight test to VMO/MMO should be performed with a qualitative assessment that no buffeting condition exists up to that speed to show compliance with § 25.251(d).

**Explanation of how design features or alternative standards provide an equivalent level of safety to the level of safety intended by the regulation**

The alternative standards provide an equivalent level of safety to that intended by the regulation by using an acceptable means to show that the original flight test compliance demonstration of the unmodified airplane remains applicable to the modified airplane.

In this case, the applicant has accepted the alternative standards described above and will show compliance to § 25.251(b) by conducting an aerodynamic vibration analysis called out in Item (3) above. The applicant will provide an analysis of flight test results to VMO/MMO from similar installations to demonstrate that no buffeting condition exists up to that speed to show compliance with § 25.251(d).

**FAA approval and documentation of the ELOS finding**

The FAA has approved the aforementioned ELOS finding in project Issue Paper F-1, titled Vibration/Buffeting Compliance Criteria, Taxi Aid Camera and Entertainment Camera Modifications. This memorandum provides standardized documentation of the ELOS finding that is non-proprietary and can be made available to the public. The TAD has assigned a unique ELOS memorandum number (see front page) to facilitate archiving and retrieval of this ELOS. This ELOS memorandum number should be listed in the Type Certificate Data Sheet under the Certification Basis section. An example of an appropriate statement is provided below.

Equivalent Level of Safety Findings has been made for the following regulation(s): § 25.251(b) Vibration and buffeting (documented in TAD ELOS Memo TS15-0029-F-1)

Original Signed by

*Robert Duffer*

Transport Airplane Directorate,  
Aircraft Certification Service

February 11, 2016

Date

ELOS Originated by Boeing Aviation Safety Oversight Office	Project Engineer: John Hed	Routing Symbol: ANM-100B
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