

Public Comment Log

Draft Order 8110.55B, How to Evaluate and Accept Processes for Aeronautical Database Suppliers

#	Commenter	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment
1	Garmin	2	6, Item 1	"1. Obtain a database LOA."	<p>Paragraph 6, items 2 and 3 are both followed by the text:</p> <p>"Note 1: It is not necessary for an applicant to obtain FAA acceptance of an aeronautical database when failure to meet the data quality requirements (DQRs) has no safety effect (i.e., routine assurance-level data, Visual Flight Rules (VFR)-only navigation database, etc.)"</p> <p>Garmin agrees with the spirit of this note, but additionally believes it to be as applicable to item 1 as it is items 2 and 3. The concept expressed in the note, that databases failing to meet DQRs that result in no safety affect do not need to obtain FAA acceptance, is equally true for appliances that generally have their databases covered by a database LOA as it is for appliances that cover database approval under the umbrella of TSO or TC/STC certification. This comment is identical to one submitted by Garmin against draft AC 20-153B, Paragraph 9, which is very similar in nature to this Order's Paragraph 6.</p>	<p>Modify the referenced text to read:</p> <p>"1. Obtain a database LOA.</p> <p>Note: It is not necessary for an applicant to obtain a database LOA for an aeronautical database when its failure to meet the DQRs has no safety effect (i.e., routine assurance-level data, Visual Flight Rules (VFR)-only navigation database, etc.)."</p>	Conceptual	Accepted. Put note first to be consistent with AC.
2	Garmin	3	6.1	"We grant a Type 1 or Type 2 LOA, defined in AC 20-153B, to an applicant in support of an operator seeking evidence of compliance to AC 20-153B using RTCA/DO-200B."	<p>When initially reading this statement, it appeared to mean that support was being given to operators seeking to prove their own compliance with AC 20-153B, which is a scenario that is rarely necessary. The statement could be re-written to clarify that the operator being supported is only trying to find evidence that their data supplier is complying with AC 20-153B.</p>	<p>Modify referenced text to read:</p> <p>"We grant a Type 1 or Type 2 LOA, defined in AC 20-153B, to an applicant seeking FAA acceptance of their aeronautical data processing activities. These LOAs serve as evidence for operators seeking to fulfill their operational, TSO, or TC/STC-driven duties to obtain databases from a supplier that complies with AC 20-153B and RTCA/DO-200B."</p>	Conceptual	Partially Accepted. Modified to read: "We grant a Type 1 or Type 2 LOA, defined in AC 20-153B, to an applicant seeking evidence of compliance to AC 20-153B using RTCA/DO-200B. These LOAs serve as objective evidence supporting operational and airworthiness approval requirements."

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3	Garmin	3	6.2.1.1	“Many FAA TSOs do not specify RTCA/DO-200B for aeronautical database assurance. For TSOs specifying a version prior to RTCA/DO-200B, or not specifying any version of RTCA/DO-200, applicants should use RTCA/DO-200B, or equivalent means (reference AC 20-153B, paragraph 3.1).”	These statements imply that, even for TSO’s that do not contain a database requirement to comply with RTCA/DO-200 (any version), applicants for approval under such TSO’s would somehow be desiring/requiring the FAA’s acceptance of their database creation processes. This hypothetical scenario seems very unlikely and seems to address a reader that probably wouldn’t be prompted to read this Order to begin with. The statements adds confusion to understanding the purpose of Paragraph 6.2.1.	Remove the referenced text and leave only the remaining text of 6.2.1.1 that addresses TSO deviations for use of DO-200B in lieu of an earlier version.	Conceptual	Not Accepted. This is intended to address the scenario that "safety-effect" databases require acceptance and they "should use RTCA/DO 200B, or equivalent means..." as specified in the AC. Paragraph 6.2.3 specifically addresses "no safety-effect."
4	Garmin	3	6.2.1.2, 2 nd bullet	“Define the verification and validation methods for all data not coming from an authoritative source (reference AC 20-153B, paragraph 11.2.1).”	The bullets within 6.2.1.2 are near copies of the bullets listed within 9.2.1.2 of draft AC 20-153B. In the case of this bullet, the text in the draft Order is slightly different than the draft AC, and it is unclear why. Suggest matching the text from the AC.	Modify text in 2 nd bullet of 6.2.1.2 to read: “Define the verification methods for all data and validation methods for data not coming from authoritative source (reference AC 20-153B, paragraph 11.2.1).” for the sake of consistency.	Conceptual	Accepted. Changes made as proposed.

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5	Garmin	4	6.2.2	“The AFM supplement or installation instruction must identify any restriction/limitations concerning operating with expired aeronautical databases.”	Garmin appreciates that paragraph 6.2.2 recognizes that the AFM(S) is not the only viable documentation to “identify any restriction/limitations concerning operating with expired aeronautical databases.” However, we would note that the typical users of installation instructions (aircraft OEM’s and/or avionics installers) are not in a position to evaluate data currency needs of any given operation, as their business with the aircraft is not operational. For this reason, the installation instructions are not an appropriate document within which to state data currency requirements or any other characteristic of data quality. See also comment on paragraph 6.3.2.	Modify the referenced text to read: “The AFM supplement or equipment operating instructions must identify any restriction/limitations concerning operating with expired aeronautical databases.”	Conceptual	Not Accepted. Language is consistent with AC as signed. Per AC 23-8C, the interpretation of § 23.1581 states that a POH is an AFM as long as the title page also includes a statement indicating that the document is in accordance with GAMA Pub 1 and is approved by the FAA. This directs the operator to their responsibilities.
6	Garmin	4	6.2.3	“Without a database LOA, database updates are a change to the TSO article.”	Similar to the spirit of Garmin’s comment pertaining to Paragraph 6, as well as the existing notes in Paragraph 6 items 2 and 3, this statement should not apply to databases when, failing to meet DQRs, result in a failure classified as no safety effect. Suggest clarifying this statement to specify that it only applies to databases more critical than those without a safety effect.	Modify the referenced text to read: “Without a database LOA, updates to a database with a failure effect other than no safety effect are a change to the TSO article.”	Conceptual	Accepted. Changes made as proposed.

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7	Garmin	4	6.3.1, 2 nd bullet	"Define the verification and validation methods for all data not coming from an authoritative source (reference AC 20-153B paragraph 11.2.1)."	The bullets within 6.3.1 are near copies of the bullets listed within 9.3.1 of draft AC 20-153B. In the case of this bullet, the text in the draft Order is slightly different than the draft AC, and it is unclear why. Suggest matching the text from the AC.	Modify text in 2 nd bullet of 6.2.1.2 to read: "Define the verification methods for all data and validation methods for data not coming from authoritative source (reference AC 20-153B, paragraph 11.2.1)." for the sake of consistency	Conceptual	Accepted. Changes made as proposed.
8	Garmin	5	6.3.1, last bullet	"Define the requirements and conditions for updating and verifying the database within the instructions for continued airworthiness."	As noted in Garmin's comments on draft AC 20-153B, 14 CFR 43.3(k) allows pilots to make updates of databases in installed avionics under specific conditions. Most GA avionics developed over the past 25 years can support the conditions specified by 43.3(k) (e.g., initiated from the flight deck, performed without disassembling the avionics unit, and performed without use of tools and/or special equipment). In such situations, the existing ICAs make no mention of database updates because there is no need for anyone other than the pilot to perform the database update.	Revise this paragraph to acknowledge that an ICA is required only if a database update cannot be performed under the conditions in 14 CFR 43.3(k).	Conceptual	Not Accepted. Language is consistent with AC as signed. Part 43 references have been removed from this new version of the AC.
9	Garmin	5	6.3.2	"The AFM must state any restriction/limitations concerning operating with expired aeronautical databases."	documentation to identify "any restriction/limitations concerning operating with expired aeronautical databases." Furthermore, implying that the AFM(S) must include such restrictions does not recognize the significant issues associated with updating an AFM(S) from the perspective of the aircraft owner/operator; particularly Part 91 (see Garmin's comments on draft AC 20-153B paragraph 12.6 for more details).	Modify the referenced text to read: "The AFM supplement or equipment operating instructions must identify any restriction/limitations concerning operating with expired aeronautical databases."	Conceptual	Not Accepted. Language is consistent with AC as signed. Per AC 23-8C, the interpretation of § 23.1581 states that a POH is an AFM as long as the title page also includes a statement indicating that the document is in accordance with GAMA Pub 1 and is approved by the FAA. This directs the operator to their responsibilities.

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10	Garmin	5	6.3.3	"Without a database LOA, we consider database updates a change to the installation approval."	Similar to the spirit of Garmin's comment pertaining to Paragraph 6, as well as the existing notes in Paragraph 6 items 2 and 3, this statement should not apply to databases when, failing to meet DQRs, result in a failure classified as no safety effect. Suggest clarifying this statement to specify that it only applies to databases more critical than those without a safety effect.	Modify the referenced text to read: "Without a database LOA, we consider updates to a database with a failure effect other than no safety effect to be a change to the installation approval."	Conceptual	Accepted. Changes made as proposed.
11	Garmin	7	10.4	"...type design holders, airline operators..."	"Airline Operators" assumes airline operations. Only a small percentage of Garmin's customers fit this description.	Suggest: "...type design holders, airline operators (if applicable),"	Conceptual	Accepted. Changes made as proposed.