

**Comments for Draft Revisions (*Not Applicable to Directives; Refer to Directive Management Officer for Directive Comment Format*)**

[For detailed instructions on how to fill out the columns below, please see the Instructions sheet.](#)

<b>Comments Submitted By:</b>	William Coveney
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#	Document Name	Page Number	Paragraph Number	Referenced Text	Comment/Rationale or Question	Proposed Resolution	Comment Type (Conceptual, Editorial, or Format)	Disposition/Response to Comment
1	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	1	Subject	"...Rechargeable Lithium battery..."	Capitalize "B" in battery to be consistent.	"...Rechargeable Lithium Battery..."	Format	Agreed- PS updated.
2	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	1	Current Regulatory and Advisory Material	Last sentence of paragraph.	Could be misinterpreted.	Change to: "The applicant shall meet these special conditions in addition to all other applicable airworthiness regulations."	Editorial	Agreed- PS updated.

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3	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	2	Conclusion	"...for other existing types of battery and battery systems."	Other than what? The later part of the sentence is confusing.	Change to: "...for Lithium types of battery and battery systems."	Editorial	Agreed- PS updated to clarify statement.
4	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	4	Special Condition #3	"Accommodate all venting provisions on the battery or battery system during installation as a mitigating provision."	Clarification; the word "during" is confusing in this context.	Change to: "Accommodate all venting provisions on the battery or battery system installations as a mitigating provision."	Editorial	Agreed- PS updated with suggestion.
5	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	4	Special Condition #3	"Provide containment of electrolyte leakage, toxic or explosive gases and debris during installation as a mitigating provision."	Clarification; the word "during" is confusing in this context.	Change to: "Provide containment of electrolyte leakage, toxic or explosive gases and debris while installed as a mitigation provisions."	Editorial	Agreed PS updated as suggested.
6	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	4	Special Condition #3	"Provide containment of electrolyte leakage, toxic or explosive gases and debris during installation as a mitigating provision."	Should explosive gases be contained on board or expelled overboard?	The ICA should address proper removal and disposal if these gases are to be contained on board.	Conceptual	Agreed with intent- updated PS to clarify statement.
7	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	6	Special Condition #9	Second sentence: "This is required to ensure..."	Should this sentence be in "The intent of this SC requirement" section?	Move the sentence to "The intent" section.	Editorial	Disagreed- The statement is part of the Special Condition that is agreed with the NPRM and cannot be changed.

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8	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	6	Special Condition #9	Third sentence: "The ICA must also contain...or other damage due to prolonged storage..."	Propose including "deterioration" with damage.	Change to: "The ICA must also contain...or other damage/deterioration due to prolonged storage..."	Conceptual	Disagreed- The statement is part of the Special Condition that is agreemnt with the NPRM and cannot be changed.
9	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	7	Special Condition #9	"Replacement batteries must be of the same manufacturer and part number as approved by the FAA."	This could be misconstrued to omit PMA by test and comp. or identity.	Elaborate or clarify that batteries approved ( PMA'd) by Test and Comp. or identity are acceptable replacements.	Conceptual	Disagreed- The statement is part of the Special Condition that is agreemnt with the NPRM and cannot be changed.
10	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	7	Special Condition #9	Last sentence of paragraph: "Precautions should be included...or other unintentional impact damage caused by dropping or other destructive means..."	Propose omitting "impact" and replacing "means" with "events."	Change to: "Precautions should be...or other unintentional damage caused by dropping or other destructive events..."	Editorial	Disagreed- The statement is part of the Special Condition that is agreemnt with the NPRM and cannot be changed.

<b>Comments Submitted By:</b>	George Roussos and Julie Alger
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11	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	1	Second paragraph	First sentence	Clarity	Change to: "Current certification regulations §§ 23/25/27/29.1353 do not <b>adequately</b> address <b>several failure, operational, and maintenance characteristics of lithium batteries that could affect the safety and reliability installation of lithium battery installations.</b> "	Editorial	Disagreed- The statement does capture that XX.1353 does not address lithium batteries.
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12	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	2	Conclusion	Distribution list	Missing office	Add: Manager, Boeing Aviation Safety Oversight Office, ANM-100B	Editorial	Disagreed- The distribution of the PS to the BASOO is the responsibility of SACO.
13	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	3	SC Requirement #1	First sentence	Clarity	Change to: "Safe cell temperatures and pressures must be maintained during all foreseeable charging or discharging conditions and during any failure of the <b>battery</b> charging <b>or monitoring</b> system not shown to be extremely remote."	Editorial	Disagreed- The statement is part of the Special Condition that is agreement with the NPRM and cannot be changed.
14	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	3	SC Requirement #2	Beginning of first sentence	Clarity	Add a The before design, to read: "The design of the rechargeable..."	Editorial	Disagreed- The statement is part of the Special Condition that is agreement with the NPRM and cannot be changed.
15	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	5	For Part 29 section	First paragraph	Clarity	Delete "all other" from the sentence. To read: "...with § 29.1309(b) and applicable regulatory guidance."	Editorial	Disagreed- 29.1309(b) is part of the regulations.
16	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	6	SC Requirement #8	First paragraph, first sentence	Clarity	Change first word from "All" to "Any" and change "installations" to "installation" To read: " <b>Any</b> rechargeable lithium battery <b>installation</b> ,..."	Editorial	Disagreed- The statement is part of the Special Condition that is agreement with the NPRM and cannot be changed.

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17	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	6	SC Requirement #9	First paragraph	Clarity	<p>Change to: The instructions for continued airworthiness (ICA) required by §§ 23/25/27/29.1529 must contain maintenance requirements to assure that the battery is sufficiently charged at appropriate intervals specified by the battery manufacturer and <b>the manufacturer of the systems and equipment to which electrical power is supplied by the rechargeable lithium battery</b> or rechargeable lithium battery system. This is required to ensure that lithium rechargeable batteries and lithium rechargeable battery systems will not degrade below specified ampere-hour levels sufficient to power the <b>aircraft systems and equipment, for their intended applications</b>. The ICA must also contain procedures for the maintenance of batteries in spares storage to prevent <b>the installation in the airplane of batteries that have</b> experienced degraded charge retention ability or other damage due to prolonged storage at a low state of charge.</p>	Editorial	Disagreed- The statement is part of the Special Condition that is agreeemnt with the NPRM and cannot be changed.
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18	Special Condition on Installed Rechargeable Lithium Ion Battery and Battery Systems on Aircraft	7	SC Requirement #9	Second paragraph	Clarity	Replacement batteries must be of the same manufacturer and part number as approved by the FAA. <b>The ICA should contain procedures for proper handling of the rechargeable lithium battery and rechargeable lithium battery systems undergoing maintenance, to prevent internal damage to batteries due to impact, and any personnel injury or property damage caused by mishandling of the batteries.</b>	Editorial	Disagreed- The statement is part of the Special Condition that is agreement with the NPRM and cannot be changed.
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