

Public Comment Table

Draft PS-ACE-23-01 – Installation of Portable Displays and Electronic Devices in Certified Small Aircraft Using Semi-Permanent Mounting Methods

#	Company or Group	Page and Paragraph	Comment	Rationale	Recommendation	Disposition
1.	ACE-MKC-AEG-11 John Vetter	Definition of Key Terms	It is improvident to create specific definitions for terms subject to case law. Further more, the terms "must" & "should" are not used within this document in the context for which they are defined and the term "recommend" is not used at all in the document so why bother defining these terms.			Partially Adopted - This is standard format. With the adoption of comments from reviewers these terms are now used in the document.
2.	ACE-MKC-AEG-11 John Vetter	Applicability	Commuter Category is incorrectly included in the Applicability section because the section excludes aircraft operating Part 91 Subpart F or K.	All Commuter Category aircraft are Part 91 Subpart F airplanes because Subpart F is applicable to all "Large" aircraft (over 12,500 lbs.) which all Commuter Category aircraft are over 12,500 lbs.		Adopted – Commuter has been removed from the document
3.	ACE-MKC-AEG-11 John Vetter	Relevant Past Practice	The examples of "supplemental information" are incorrect except for "flight planning" and "backup navigation". All the other examples given in the second sentence are actually primary functions required by operating regulations but just not required for all aircraft in all operations.			Not adopted – As pointed out, these can be supplemental information dependent on aircraft and operation.
4.	ACE-MKC-AEG-11 John Vetter	Relevant Past Practice	PEDs can also host many other functions, including: moving map graphics (showing aircraft position) with terrain and obstacle alerting and traffic information service (to assist in the identification & proximity of other aircraft needs to be qualified as applicable to VFR Only aircraft. Uncertified moving maps (showing aircraft position) is for VFR aircraft only. Uncertified terrain and obstacle alerting excludes any turbine powered aircraft with 6 or more seats. Uncertified traffic information service needs to not conflict with 91.221 requiring approval by the Administrator.			Not adopted – Although the comment is technically correct the text does not fall in the scope of the document.
5.	ACE-MKC-AEG-11 John Vetter	Relevant Past Practice	Additional functions examples are all Primary Flight Instrument functions that are currently not allowed in portable equipment per AC 120.76. It appears the			Adopted - These are functions that are currently found on readily available PEDs. The intent is to clarify their use as only

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			intent here is to allow "back-up information" but not have any Primary Flight Information. This might be accomplished by describing "back-up" or "supplemental" information in a way that avoids primary flight instrument functions and removing all the references in the paragraph to other primary functions. Also the primary flight instrument requirements are different for VFR and IFR aircraft.			supplemental or back-up. Added "back-up" to the description.
6.	ACE-MKC-AEG-11 John Vetter	Policy; Installation of Mounting Devices	"Portable devices may be attached...connect power....interface with various installed systems...may be considered a minor alteration" is contrary to current AIR guidance.	AC 20-173 prescribes the means similar to this paragraphs bulleted items but as a certification requirement not as a "minor alteration". Reference to 23.1301, 23.1309 & 23.561 seems to indicate a standard other than "minor alteration".		Adopted - Reworded with input from all commenters
7.	ACE-MKC-AEG-11 John Vetter	Additional Considerations	Reference to 91.21 noninterference is not appropriate without making a distinction for VFR versus IFR airplanes. VFR only airplanes do not need to address 91.21 at all by applicability. Also the current means of compliance for 91.21 IFR aircraft only requires noninterference for all phases of flight for EFB functions suited to all phases of flight. Functions not useful as EFB functions expose an IFR aircraft to possible EMI in a critical phase of flight for information that is "supplemental" or "advisory" is probably not prudent but "supplemental" or "advisory" information does not merit a higher level of noninterference assurance either. It may be best to not go there from an FAA Safety standpoint.			Adopted - Reworded to reference IFR
8.	AOPA-GAMA	General	AOPA and GAMA are concerned that the intent of this policy isn't clear as it contains numerous examples of contradicting language and undefined terms. AOPA and GAMA believe the intent of the policy statement is to provide clarifying policy on modifications regarding the installation of mounting devices and wiring integration for PEDs as indicated in the first sentence of the summary section; "The purpose of this memorandum is to clarify FAA certification policy for modifying normal, utility, acrobatic, and commuter category	However the subject line (title) states "Installation of mounting devices and wiring integration to support the use of portable displays and ...". Further, the first sentence of the "Applicability" section states; "This policy statement provides small aircraft owners, operators, and pilots ...with information on the attachment and acceptable use of portable, uncertified cockpit displays connected to an airplane's installed mounting device.	To help clarify the policy statements intent, AOPA/GAMA recommend the FAA change the subject and applicability sections to focus on minor change installations by removing the implication and language regarding "use" or "acceptable use". In addition, clarify intent of policy statement for when the installation mounts and wiring for PED can be minor, and	Adopted – changed the title and added clarification

Deleted:

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			airplanes with attached portable electronic devices (PED).		when it is not minor and must be evaluated for further compliance.	
9.	AOPA-GAMA	General	AOPA and GAMA also believe the intent is to clarify how the installation mounts and wiring for PED can be installed under a minor change. We agree a policy statement could be beneficial for that purpose. However, there are several references to the Aircraft Certification Services, regulations, and terms more associated with certification and engineering review of changes not normally required for minor alterations. (Some specific examples are listed below; however a general clarifying statement may be in order.)		To help clarify the policy statements intent, AOPA/GAMA recommend the FAA change the subject and applicability sections to focus on minor change installations by removing the implication and language regarding “use” or “acceptable use”. In addition, clarify intent of policy statement for when the installation mounts and wiring for PED can be minor, and when it is not minor and must be evaluated for further compliance.	Adopted – added clarification
10.	AOPA-GAMA	Page 1, Subject			Change to “...Integration to support the-use attachment of portable displays and portable electronic devices...”	Adopted
11.	AOPA-GAMA	Page 1, Summary	The first sentence of the summary section states; “The purpose of this memorandum is to clarify Federal Aviation Administration (FAA) certification policy for...”. As there are numerous policy documents regarding this subject, AOPA/ GAMA request that the FAA include which FAA certification policy documents the FAA is intending to clarify.	AOPA /GAMA understand the “Current advisory Material listed on page 2 to only be a list of reference information only and not the target list.	If the list on page 2 is the targeted policies than we suggest the FAA state so in the summary section.	Not Adopted - This section is standard phraseology for policy statements. The list of referenced material is not necessarily the target material for the policy but reference material for this policy.
12.	AOPA-GAMA	Page 1, Definition of Key Terms	AOPA/GAMA feel it is essential that this policy statement include additional key terms that align with other referenced FAA material’s definition sections (from page 2) and includes at a minimum, terms such as; <ul style="list-style-type: none"> • Attached (in regards to mounting device) • Portable Electronic devices and hosted software • EFB and the definitions of the classes of EFBs <ul style="list-style-type: none"> o Specifically include definition of what “basic functionality of an EFB” since it is used in the summary section of the document. • Mounting Devices with examples 			Partially Adopted – deleted reference to EFB

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13.	AOPA-GAMA	Page 1, Applicability	The applicability section and effect of policy section seem to contradict.	<p>The first sentence of the “Applicability” section states: “This policy statement provides small aircraft owners, operators and pilots ... information on the attachment and acceptable use of portable, uncertified cockpit displays connected to an airplane’s installed mounting device.”</p> <p>The Effect of Policy section states: “The FAA Aircraft Certification Offices should implement this policy when applicable to the specific project. Whenever an applicant’s proposed method of compliance is outside this established policy ...” The normal use of this policy will be by owners, operators and pilots that seek to have PED’s installed in their aircraft as a “minor alteration”. In this case, the Aircraft Certification Office will not be involved and there will be no applicant.</p>	<p>Clarify that the FAA Aircraft Certification Office would implement this policy only IF there is an applicant. Otherwise, the FAA Flight Standards District Office may ensure that the policy is followed.</p> <p>Also, AOPA/GAMA recommend the FAA change first sentence to read “This policy statement provides small aircraft owners, operators, maintenance personnel, and pilots operating Normal, Utility, Acrobatic, and Commuter Category airplanes under Title 14 of The Code of Federal Regulations (14 CFR) part 91 (not operating under part 91, subpart F or K), with information on the attachment and acceptable use of portable, uncertified cockpit displays connected attached to an airplane's installed mounting device.</p> <p>Remove second to last sentence as this has already been stated in the first sentence of the paragraph.</p>	Adopted
14.	AOPA-GAMA	Page 1, Applicability, Last Sentence	The last sentence of the section states: “It does not apply to any airplane operator seeking to use these types of devices for operational credit.”	Conceptually, approval to use an EFB is required for Part 91 Subpart K or other operators requiring MSpec/OpSpec approval. Prohibiting “operational credit” is overly broad, since Part 91 operators (including subpart F) are permitted to use these devices for aeronautical charts.	<p>Provide a clearer definition of what operators are excluded from this guidance. For example, Part 91 subpart K, Parts 121/125/135.</p> <p>Also recommend removing the word “airplane” from this sentence.</p>	<p>Partially Adopted - This policy is from the Small Airplane Directorate and only applies to airplanes.</p> <p>Reworded to better clarify what is excluded.</p>
15.	AOPA-GAMA	Page 2, Current Regulatory and Advisory Material	AOPA/GAMA request that the FAA remove “regulatory” from the paragraph header as none of the listed material is regulatory in nature therefore the current language indicates something within the			Not adopted - This is standard format

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			reference is mandatory.			
16.	AOPA-GAMA	Page 2, Current Regulatory and Advisory Material	Typo: "ASTM F2369" should be changed to "ASTM F2639"			Adopted
17.	AOPA-GAMA	Page 2, Relevant Past Practice	Change second sentence to read "Such functions include, for example , flight planning..."			Adopted
18.	AOPA-GAMA	Page 2, Relevant Past Practice	Change fourth sentence to read "Additional examples of functions they can host are items such as, but not limited to, emergency flight instruments..."			Adopted
19.	AOPA-GAMA	Page 2, Relevant Past Practice	Change the last sentence to read "When using a PED for these supplemental functions, the pilot is not relieved from the any requirement to follow regulation , operational requirements and/or procedures and limitations found in the Airplane Flight Manual or other applicable requirements. "			Adopted
20.	AOPA-GAMA	Page 2, Relevant Past Practice	AOPA/GAMA recommends the FAA conclude this section with the first sentence as the remainder of the existing paragraph is either PED description (second sentence) or policy (last sentence) but does not seem to fit under "past practice" section.			Not adopted - The structure of this paragraph was based on multiple comments. The current format covers the majority of input.
21.	AOPA-GAMA	Page 2, Policy, PED navigation and instrumentation displays	Change the paragraph to read "PEDs attached to installed mounts are not intended approved for use as a source for of anyrequired flight or navigation instruments information or for primary reference in the performance of any approved operation. They cannot replace or displace any equipment required by the applicable design or regulatory requirements, unless such use is specifically approved under STC or TC. "			Adopted
22.	AOPA-GAMA	Page 2, Policy, Installation of mounting devices	The first referenced paragraph states: "The mounting device installation, including the PED system power and data connectivity in not-for-credit operations, may be considered a minor alteration." Then the second referenced paragraph states: "Aircraft Certification Service evaluation and design approval will be			Not Adopted - This section was rewritten such that this comment no longer applies.

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			<p>limited to the approval of the applicable mounting device to include design, acceptable material characteristics, mounting strength, crashworthiness, data connectivity, power connection, and installation location.”</p> <p>However, the Aircraft Certification Service will not perform an evaluation or design approval for a minor change. The normal installation will be done under a minor alteration and no engineering evaluation will be made by Aircraft Certification Services. Engineering evaluation could be necessary if the criteria for a minor alteration cannot be met, or unless the change is being included with another major alteration or type design change. Please clarify second referenced paragraph is applicable only in cases where the Aircraft Certification Services will evaluate the alteration.</p>			
23.	AOPA-GAMA	Page 2, Policy, Installation of mounting devices	<p>In addition to the above clarification request, AOPA/GAMA requests that the FAA change the paragraph to read “Portable devices may be attached to the airplane by an installed mounting device, and may connect to airplane power and interface with various installed systems during normal operation and use. Section 23.1309, in part, requires such connectivity to not negatively adversely impact the operation of any required equipment or adversely impact flight safety. The mounting device installation, including the PED system power and data connectivity in not-for- credit, non-interference operations, may be considered a minor alteration. The intended function and operating limitations must be considered in the installation of the mounting device and the attachment of the PED. For a mounting device installation, including provisions for power and/or data connectivity, an installation to be considered a minor alteration, the</p>			Adopted

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			following requirements must be satisfied:			
24.	AOPA-GAMA	Page 3, Policy, Installation of mounting devices	The policy statement appears to be directed towards the installation of mounting devices and interfaces to the aircraft systems. However, the bullets include numerous references to functions provided by the PED itself. Guidance regarding the information displayed on the PED and/or field-of-view requirements is not directly related to the installation of the mount. AOPA/GAMA requests the FAA remove guidance regarding the information displayed on the PED and limitations on the field-of-view requirements.		<p>Please change the bulleted list to read;</p> <ul style="list-style-type: none"> • The attached PED must not cannot replace any system or equipment required by the regulations. • The information accessible via the attached PED shall must not be confused with primary flight information and may not be nor may it contradictory to that information. • The mounting device installation should must be placarded appropriately for its intended function and limitations, and the intended function and limitations of the attached PED. (Example "Not Intended-Approved For Primary Navigation.") • The layout of the required equipment cannot-must not be affected by installation of the mounting device or by attachment of the PED to that mount, or by connection of any wiring provisions to the mount or the PED. • The installed mounting device (or other securing mechanism) that attaches or allows mounting of the 	Adopted

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					<p>PED system should must not be positioned in a way that the mount or the mount plus attached PED obstructs visual or physical access to aircraft controls, displays, flight crew ingress or egress, or impairs external vision.</p> <ul style="list-style-type: none"> It is recommended that the design and installation of the mount should allow the user easy access to the attached PED controls and a clear view of the attached PED display while in use. The mount in small airplanes may be placed installed in the Pilot's Primary Maximum Field of View (as defined in AC 23.1311-1B), but must not be installed in the Primary Field of View should be offset from the vertical plane of the pilots' forward vision so and must it is not be the primary point of focus. If the installed mount or wiring provisions PED requires include cabling to mate with airplane systems, and if the cable is not run inside the mount, the cable should must be installed in accordance with the requirements of AC43.13-1B. It is recommended that temporary cabling not hang loosely or in a 	

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					<p>way that compromises task performance and safety. Flight crewmembers should be able to easily secure the temporary cables out of the way during aircraft operations (e.g., cable tether straps).</p> <ul style="list-style-type: none"> The installed mount and any required electrical wiring is must be composed of acceptable materials. If the attached PED can be connected, either wired or wirelessly, to other airplane data buses and/or communication systems, it must not transmit any data to any installed equipment, unless that connection is specifically approved under STC or TC. ¶ Attached PEDs may receive data from installed equipment. Attached PED failures should must not adversely affect other installed airplane systems or adversely impact flight safety. 	
25.	AOPA-GAMA	Page 3, Policy, Installation of mounting devices, Second to last paragraph	Second to last paragraph states: Section 23.1301 requires intended function be addressed and each installed equipment item be of a kind and design appropriate to its intended function. As part of the intended function, the mount should retain the portable unit in all flight regimes and meet the requirements prescribed in § 23.561(b)(3) for items of	A mechanic likely will be unfamiliar with 14 CFR 23; however, an installation that is performed in accordance with AC43.13-2B would meet the intent of the statement. Please clarify the real intent is for the installation to be in accordance with the guidance of AC43.13-2B.		Adopted

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			mass. The mounting device installation should conform to existing guidance in AC 43.13-2B or ASTM F2639.			
26.	AOPA-GAMA	Page 3, Policy, Installation of mounting devices, Second to last paragraph	AOPA/GAMA recommends the FAA change the paragraph to state: "Section 23.1301 requires that the intended function of installed equipment be identified addressed and each installed equipment item be of a kind and design appropriate to its intended function.	As part of the intended function, the mount should retain the portable unit in all flight regimes and meet the requirements prescribed in § 23.561(b)(3) for items of mass. The mounting device installation should conform to existing guidance in AC 43.13-2B or ASTM F2639.		Adopted
27.	AOPA-GAMA	Page 4, Additional Considerations	Begins with the statement; "Section 91.21 requirements must be addressed for PEDs." Section 91.21 applies only to IFR operations; consequently, it is unclear why it "must be addressed for PEDs" in an aircraft used only for VFR operations.		AOPA/GAMA requests the FAA add clarification.	Adopted
28.	AOPA-GAMA	Page 4, Additional Considerations	AOPA/GAMA suggest the FAA change the last sentence of the second paragraph to read "These systems are not intended approved to be an information the source for any required function information or approved operation.			Partially Adopted – section rewritten
29.	AOPA-GAMA	Page 4, Additional Considerations	Includes the statements; Part 91 operations (non-subpart For K) do not require specific authorization for PED operational use provided the device does not replace any system or equipment required by regulation and no operational credit is requested. These systems are not intended to be the source for any required information or approved operation.	The phrases "equipment required by regulation" and "any required information" within these statements are excessively prohibitive. Although there is no explicit regulatory requirement to carry paper charts for basic Part 91 operators, these statements/phrases may practically prohibit the use of a PED for any operational purpose. Even basic Part 91 operators must refer to aeronautical data to comply with 91.103 and the general operating rules. This paragraph appears to prohibit the use of PED for any operational purpose whatsoever.	AOPA/GAMA request the FAA provide more explicit information regarding what uses are permitted/prohibited, or omit this paragraph entirely as it is not related to the mounting system.	Adopted - This section was deleted.
30.	Bell Helicopter Jeff Livingston	General	Will this policy statement cover rotorcraft, part 27 and part 29?			This policy is from the Small Airplane Directorate and only applies to airplanes.

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31.	Embraer	Page 3, Bullet 5	Both the fifth and seventh bullets on page 3 refer to not adversely affecting pilot visual access, whether to external vision or visual access to instruments and controls. In addition, while the objective of the fifth bullet is reasonable, a requirement that the PED and its mount never obscure any instrument or control is too restrictive. Even a control yoke can obscure some instruments or controls.	Embraer believes that the general guidance in the fifth bullet is sufficient and the specific limitation on "offset from vertical plane of the pilot's forward vision" is too prescriptive and should be deleted. Embraer believes that a more reasonable standard would be to state that "... the PED system should not be positioned in a way that unacceptably obstructs visual or physical access to aircraft controls, ..."	Delete the specific limitation on "offset from vertical plane of the pilot's forward vision"	Partially Adopted – section reworded
32.	Embraer	General	The requirement that the mount comply with 23.561(b)(3) is acceptable for PEDs that are approved for use during takeoff and landing, but there should be provisions for PED installations that are placarded inflight use only (Limitation that PED must be stowed for takeoff and landing). These installations should be required to show compliance for inflight loads only.			Not Adopted - This is outside of scope for the intended mounts.
33.	Embraer	Title	The proposed policy is clearly addressing portable displays and electronic devices that are installed in the cockpit. To make it clear that this policy is not relevant for installations in the passenger cabin, Embraer suggests to modify the subject of the policy statement to Installation of Mounting Devices and Wiring Integration to Support the Use of Portable Displays and Electronic Devices in the Cockpit of Normal, Utility, Acrobatic, and Commuter Category Airplanes.		Change the title to Installation of Mounting Devices and Wiring Integration to Support the Use of Portable Displays and Electronic Devices in the Cockpit of Normal, Utility, Acrobatic, and Commuter Category Airplanes.	Not adopted – in a small aircraft this could apply to mounts installed for passengers.
34.	Garmin	General comment	Garmin believes there is some confusion regarding the overall intent of the policy statement. It appears the intent is to clarify how the installation mounts and wiring for PED can be installed under a minor change. Garmin agrees a policy statement could be beneficial for that purpose. However, there are several references to the Aircraft Certification Services, regulations, and terms more associated with certification and engineering review of changes not normally required for minor alterations. (Some specific examples are listed below, however a general clarifying statement may be in order.)		Clarify intent of policy statement for when the installation mounts and wiring for PED can be minor, and when it is not minor and must be evaluated for further compliance.	Adopted - Reworded to clarify

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35.	Garmin	Page 1, "Applicability" and Page 4, "Effect of Policy"	<p>These two sections seem at odds.</p> <p>The first sentence of the "Applicability" section states:</p> <p style="padding-left: 40px;">This policy statement provides small aircraft owners, operators and pilots ... information on the attachment and acceptable use of portable, uncertified cockpit displays connected to an airplane's installed mounting device.</p> <p>The Effect of Policy section states:</p> <p style="padding-left: 40px;">The FAA Aircraft Certification Offices should implement this policy when applicable to the specific project. Whenever an applicant's proposed method of compliance is outside this established policy ...</p>	<p>The normal use of this policy will be by owners, operators and pilots that seek to have PED's installed in their aircraft as a "minor alteration". In this case, the Aircraft Certification Office will not be involved and there will be no applicant.</p>	<p>Clarify that the FAA Aircraft Certification Office would implement this policy only IF there is an applicant. Otherwise, the FAA Flight Standards District Office may ensure that the policy is followed.</p>	Adopted
36.	Garmin	Page 2, Current Regulatory and Advisory Material	<p>Typo: ASTM F2369</p>	Editorial ("2369" should be "2639")	Change to: ASTM F2639	Adopted
37.	Garmin	Page 2, " <u>Installation of mounting devices</u> ";, second paragraph And Page 3, last paragraph	<p>The first referenced paragraph states:</p> <p style="padding-left: 40px;">The mounting device installation, including the PED system power and data connectivity in not-for-credit operations, may be considered a minor alteration.</p> <p>Then the second referenced paragraph states:</p> <p style="padding-left: 40px;">Aircraft Certification Service evaluation and design approval will be limited to the approval of the applicable mounting device to include design, acceptable material characteristics, mounting strength, crashworthiness, data connectivity, power connection, and installation location.</p> <p>However, the Aircraft Certification Service will not perform an evaluation or design approval for a minor change.</p>	<p>The normal installation will be done under a minor alteration and no engineering evaluation will be made by Aircraft Certification Services. Engineering evaluation could be necessary if the criteria for a minor alteration cannot be met, or unless the change is being included with another major alteration or type design change.</p>	<p>Clarify second referenced paragraph is applicable only in cases where the Aircraft Certification Services will evaluate the alteration.</p>	Adopted

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38.	Garmin	Page 3, second to last paragraph, starts "Section 23.1301..."	This paragraph states: Section 23.1301 requires intended function be addressed and each installed equipment item be of a kind and design appropriate to its intended function. As part of the intended function, the mount should retain the portable unit in all flight regimes and meet the requirements prescribed in § 23.561(b)(3) for items of mass. The mounting device installation should conform to existing guidance in AC 43.13-2B or ASTM F2639.	A mechanic likely will be unfamiliar with 14 CFR 23; however, an installation that is performed in accordance with AC43.13-2B would meet the intent of the statement.	Clarify the real intent is for the installation to be in accordance with the guidance of AC43.13-2B.	Adopted
39.	Garmin (AP)	Page 1, Applicability	The last sentence of the section states: It does not apply to any airplane operator seeking to use these types of devices for operational credit.	Conceptually, approval to use an EFB is required for Part 91 Subpart K or other operators requiring MSpec/OpSpec approval. Prohibiting "operational credit" is overly broad, since Part 91 operators (including subpart F) are permitted to use these devices for aeronautical charts. Also recommend removing the word "airplane" from this sentence.	Provide a clearer definition of what operators are excluded from this guidance. For example, Part 91 subpart K, Parts 121/125/135.	Adopted
40.	Garmin (AP)	Page 3, bulleted list	The policy statement appears to be directed towards the installation of mounting devices and interfaces to the aircraft systems. However, the bullets include numerous references to functions provided by the PED itself.	Guidance regarding the information displayed on the PED and/or field-of-view requirements is not directly related to the installation of the mount.	Remove guidance regarding the information displayed on the PED and limitations on the field-of-view requirements.	Adopted – reworded for clarity
41.	Garmin (AP)	Page 4, Additional Considerations	Begins with the statement: Section 91.21 requirements must be addressed for PEDs.	Section 91.21 applies only to IFR operations; consequently, it is unclear why it "must be addressed for PEDs" in an aircraft used only for VFR operations.	Add clarification.	Adopted
42.	Garmin (AP)	Page 4, Additional Considerations	Includes the statements: Part 91 operations (non-subpart For K) do not require specific authorization for PED operational use provided the device does not replace any system or equipment required by regulation and no operational credit is requested. These systems are not intended to be the source for any required information or approved operation. The phrases "equipment required by	Although there is no explicit regulatory requirement to carry paper charts for basic Part 91 operators, these statements/phrases may practically prohibit the use of a PED for any operational purpose. Even basic Part 91 operators must refer to aeronautical data to comply with 91.103 and the general operating rules. This paragraph appears to prohibit the use of PED for any operational purpose whatsoever.	Provide more explicit information regarding what uses are permitted/prohibited, or omit this paragraph entirely as it is not related to the mounting system.	Adopted – paragraph omitted

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			regulation” and “any required information” within these statements are excessively prohibitive.			
43.	UASC	Page 3, last bullet item	Requirement limits all PEDs to receipt of data only without the ability to transmit. This should be amended.	It is feasible to have a PED transmit certain limited types of data with an appropriate system firewall and do so with an acceptable system and flight crew acknowledgement design logic precluding insertion of potentially corrupted or inappropriate data.	Transmit functions should be evaluated regarding intended function, and be allowable if the input of such data is reviewed by flight crew prior to use by onboard certified avionics systems.	Adopted - Reworded to clarify