

Document Comment Log (Table) – Public Comments Disposition

Proposed Policy Statement, PS-ASW-27,29-10;

Title: Policy Statement Concerning Non-Required Safety Enhancing Equipment (NORSEE) in Rotorcraft.

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GAMA, G.J. Bowles	General Comments	<p>The General Aviation Manufacturers Association (GAMA) appreciates the opportunity to provide the FAA Rotorcraft Directorate (FAA-RD) with comments on draft policy statement PS-ASW-27,29-10, Concerning Non-Required Safety Enhancing Equipment (NORSEE) in Rotorcraft. GAMA strongly supports the FAA's notion that incentivizing the installation of certain safety enhancing equipment through streamlined certification processes will lead to significant net safety benefit. GAMA believes that moving in this direction will drive further safety innovation, the widespread adoption of key safety technologies and will result in a healthier and safer industry.</p> <p>While it is difficult to tie the overall operational safety benefits some equipment can provide at the design certification level, this forward looking policy steps in that positive direction. In order to maximize the safety benefit of the proposed policy, GAMA offers the following thoughts.</p>		Noted: The FAA appreciates the efforts and will continue to work the GAMA and other associated aviation groups, to facilitate the safe incorporation of technological solutions in rotorcraft.

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		<p>General Comments: In order to assure that this proposed policy achieves the desired level of safety benefit without resulting in unnecessary work for the FAA, GAMA suggests examples be included to specify NORSEE items which would provide a high enough level of safety benefit to take advantage of the provisions of this policy. Certainly this list couldn't be inclusive but it would assist in eliminating a large number of repetitive issue papers once a NORSEE item is in common use based upon this forward thinking policy. Alternatively, the FAA could create an appendix or referenced tool that could include technologies which meet the commensurate level of safety for applicability through this policy. GAMA is also willing to work with the FAA Rotorcraft Directorate to assemble a list of current technologies which would be appropriate for inclusion and the defining characteristics and limitations necessary for applicability.</p> <p>GAMA is concerned that this</p>		<p>Adopted with comments: In response to this comment, at the most recent FAA-RD/GAMA/AEA (Aircraft Electronics Association) meeting, GAMA and AEA took the action to form a group to develop a list of NORSEE equipment/systems. The result of this approach will be to create a listing of the eligible systems for NORSEE and post it to the Rotorcraft Directorate's public website.</p> <p>This listing will be expanded as industry and the FAA reach concurrences on what equipment and systems are appropriate for application of this NORSEE policy.</p> <p>Adopted; a statement to clarify that applicants</p>

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		<p>policy could be misconstrued to require specific methods of compliance to 27.1301, 27.1309, 29.1301 and 29.1309 because of the manner in which some examples of compliance are illustrated in this policy. More specifically, GAMA does not believe one must use SAE ARP 4754A or RTCA DO-178/DO-254 but certainly these might be methods that could be used to demonstrate compliance. It would be helpful if this policy would clarify this point.</p> <p>Overall this policy will have a significant safety benefit especially in the areas where technological mitigations can have the most significant benefit (single engine turbine & piston rotorcraft) because of the highest cost sensitivities. GAMA appreciates the ability to comment on this policy, please contact us for any clarifications and we look forward to working with the FAA Rotorcraft Directorate as these policies are implemented.</p>		<p>are free to utilize other acceptable methods to show compliance. Applicants incorporating such methods would be well advised to coordinate with the FAA early to ensure the method chosen is acceptable.</p>
AMOA, C. Eastlee	General Comment	The Air Medical Operators Association (AMOA) formed in		

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		<p>2008 in to take ownership of aviation safety measures in the air medical transport industry. Our members are Part 135 Certificated Air Carriers responsible for the safe operation of over 730 of the approximately 800 aircraft performing air medical transports in the United States. The priority of the association is to address the historical threat areas and known issues for aviation safety in the air medical industry. Since our inception, AMOA focused on a combined effort to institute control measures and operating enhancements to drive a zero defect approach for aviation safety.</p> <p>We would like to take this opportunity to comment on the Policy Statement Concerning Non-Required Safety Enhancing Equipment (NORSEE) in Rotorcraft PS-ASW-27,29-10. We commend the FAA for their efforts to enhance the inspection and certification process of safety equipment in rotorcraft used in air medical transport. We further commend the FAA for their recognition of an issue within our</p>		<p>Noted adopted; the FAA has given consideration to the scope of possible applications where a relaxation in the design and construction standards would be warranted. In the interest of protecting the flying public, any relaxation in the established airworthiness standards must be offset by an increased, overall, level of safety. The Code of Federal Regulations established the minimum airworthiness standards and to arbitrarily allow relaxation, without a justifiable safety benefit, would not serve the public good.</p>

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		<p>industry for many years, especially amidst efforts to enhance safety through the installation of proven equipment. While we support the intent of this policy change, we would like the FAA to consider extending the scope of this policy beyond the design of safety enhancing equipment.</p> <p>We believe, based on the wording of the document, this change extends only to Software Design Assurance Levels. While we are generally supportive of the policy change, we believe that the vast majority of issues with the certification process that could be positively influenced by a change in policy of this type would be unaffected by this particular effort. The following statement from the policy change document captures our optimistic support:</p> <p>“The FAA encourages the use of optional, non-required equipment that can improve safety for an increased number of rotorcraft under most operational conditions. This approach involves considering not only the <i>risk</i> side of the safety equation,</p>		

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		<p>as is typically done, but also the safety <i>benefits</i>. A possible increased safety risk from failed or malfunctioning non-required equipment to an individual rotorcraft operating in unusual conditions should not necessarily overshadow the rest of the fleet benefiting from the safety enhancement resulting from the introduction of such equipment in most operational conditions.“</p> <p>We hope the spirit of this policy change exceeds the limited scope framed by the document; this change in overall FAA policy could be a major breakthrough when applied to the inspection and certification process, and may provide relief in delays caused by current FAA policy. FAA clearly recognizes the need for this type of policy change; it should follow that the intent of the above statement should apply to all aspects of safety equipment, not just those within the limited scope described by the letter.</p> <p>Operators are currently faced with a significant problem when choosing to enhance the safety of</p>		<p>Noted; avoiding controlled flight into terrain (or obstacles) is obviously paramount to safety. There have been a vast number of</p>

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		<p>their aircraft with non-required equipment- or, as is the case in the air medical community, with equipment that may be required in future rulemaking, such as HTAWS. In order to install a non-required safety technology, such as Helicopter Terrain Awareness and Warning Systems (HTAWS), an operator must concede to far more oversight and scrutiny over the installation and maintenance of that equipment than if they choose to operate without it. HTAWS are not currently required equipment for helicopters conducting air medical transport services, yet our operators are committed to the safety benefit of the technology and have installed these devices on more than half of the approximately 800 helicopters in our collective fleet. FAA policy has delayed these installations by requiring an STC rather than allowing for field approval of the installation. In this instance, the spirit of the policy above could be of great benefit to operators if extended more broadly.</p> <p>Please contact me for any further</p>		<p>solutions to aid a pilot in this regard. While “something is better than nothing” may or may not be true (depending upon a number of variables), once a system is either required, or is being installed as an “approved” system and is showing compliance to the air regulations, or an industry standard that establishes a “minimum performance standard” (MOPS), a certain level of oversight has been repeatedly shown itself to be necessary, to ensure that those approved standards are truly being met. So, as industry, operators and approving entities become more familiar with the established requirements for a compliant HTAWS system, and meet those minimum standards, HTAWS warrants the oversight of an STC. Conversely, if an applicant desires to install a terrain advisory system in an aircraft where the system is not required by the airworthiness or operating rules, an STC is not required. It can be expected that as approvable installations of HTAWS become the baseline, a relaxation of the current policy to install these via an STC may become an acceptable path.</p>

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		<p>C software or AEH, even though the FHA hazard classification remains at hazardous.</p> <p>I would not necessary agree to such an allowance / alleviation.</p>		<p>provide a relaxation in the DAL, by one level from what has historically been required for a given hazard level. This relaxation is only in those cases where a net safety benefit is gained, by incorporating the proposed equipment into the rotorcraft fleet. The intended goal being to enable the incorporation of safety enhancing equipment into a greater number of rotorcraft, while accepting a slightly higher risk of anomalous behavior of that equipment in a very small subset of that number, thus a net increase in safety.</p>
Eurocopter & American Eurocopter	Pg 1, Purpose, para 2	<p>General Comments: Eurocopter & AE would agree with the NORSEE policy as amended as follows:</p> <ul style="list-style-type: none"> - because some drawbacks might not be visible immediately, the concept should be, by precaution, and at least in its first implementation step, limited to Part 27 helicopters only where the expected safety enhancement with NORSEE is the most important, and which by the way correspond to the FAA's and IHST's priority in the action of reducing the number of accidents, - the concept should be limited to DAL C NORSEE equipment only, 	<ul style="list-style-type: none"> - to limit the NORSEE policy to Part 27 helicopters only, - to limit the NORSEE policy to DAL C NORSEE equipment only, excluding the engine(s). - to condition the use of the NORSEE policy by STC holders by a NTO (Non Technical Objection) delivered by the TC holder. 	<p>Not adopted; the notion to limit the NORSEE policy to Part 27 was considered. It was determined that those systems and design levels required by Part 29 would remain intact. But, by not limiting this policy to Part 27, an applicant can propose the addition of a NORSEE qualifying system, provided the same analysis and showing of a net safety enhancement is presented and agreed upon.</p> <p>Similarly, limiting the NORSEE policy to DAL C closes the door to other technological systems that may provide a significant safety improvement to the rotorcraft fleet. The onus will remain upon the applicant to present the safety case that the system being introduced will improve the overall safety of rotorcraft. In response to the recommendation of a Non-Technical Objection requirement, the CFRs</p>

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		<p>because of the risk of introduction of accidents due to the DAL requirement relaxation on NORSEE classified DAL A or B in case of failure or malfunction of these equipment which could lead to catastrophic or hazardous consequences respectively, and taking into account that it will be very difficult to quantify the safety enhancement gains brought by the requirement relaxation from DAL A to DAL B and from DAL B to DAL C over the life of the corresponding helicopters. In addition, although theoretically classified DAL C in the helicopter certification safety analyses, the engine(s) should be excluded from the NORSEE policy because of the obvious importance on flight safety of such unique equipment.</p> <p>- the possibility of using the NORSEE policy by STC holders should be conditioned by a NTO (Non Technical Objection) delivered by the TC holder. As a matter of fact only the TC holder has the comprehensive knowledge of the consequences on the rotorcraft flight safety of installing a NORSEE equipment with the</p>		<p>(part 21 in particular) requires any applicant for any type certificate must show compliance with all applicable regulations. The business decisions as to how to accomplish this requirement are left up to the applicant.</p> <p>The engine itself is required equipment and would not be considered NORSEE. Further, there are stand-alone engine certification requirements, found in part 33.</p>

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		relaxation of requirements brought by the NORSEE policy. Moreover the cost of the TC holder’s NTO should be paid by the STC holder.		
GAMA, G.J. Bowles	Pg 2, Current Regulatory and Advisory Material, last sentence	The last sentence of this section states “The result of these requirements will determine the appropriate system development assurance level (DAL), consistent with Society of Automotive Engineers (SAE) Aerospace Recommended Practice (ARP) 4754A, software per Radio Technical Commission for Aeronautics (RTCA) Document Order (DO)-178B, and the design assurance level (DAL) for airborne electronic hardware, consistent with RTCA/DO-254.” GAMA believes the FAA is using this sentence to illustrate that there are a number of standards which are currently accepted as methods of compliance to 27.1301, 27.1309, 29.1301 and 29.1309 but not that all of these methods are required when a certification activity is conducted under the provisions of this NORSEE policy.	GAMA suggests the FAA clarify this sentence as follows to remove any confusion: “The result of these requirements will determine the appropriate system development assurance level (DAL), consistent with Society of Automotive Engineers (SAE) Aerospace Recommended Practice (ARP) 4754A, software per Radio Technical Commission for Aeronautics (RTCA) Document Order (DO)-178B or C , and/or the design assurance level (DAL) for airborne electronic hardware, consistent with RTCA/DO-254.”	Intent partially adopted; incorporated the change to clarify that the design assurance level (DAL) and/or the development assurance level (DAL) need to be done in a manner consistent with the referenced industry standards. Not incorporated was the reference to DO-178C, as earlier versions of these standards may be acceptable. A note to the effect that later revisions of the referenced documents would be acceptable addresses the recent C revision of DO-178, without precluding an even later revision.
Eurocopter & American Eurocopter	Pgs 2 & 3, Policy, paras	Although we understand that it is the FAA intention to allow so, it would be better to precise that the	To modify the following sentences as follows (as shown by the bold characters):	Not adopted; as stated in the draft policy, for any system to be considered for NORSEE, the “loss of” function must, by definition, be no

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	1, 1 b, & 2.	NORSEE concept authorizes, in association with the one level reduction in DAL, that the requirement of maximum probability of failure or malfunction is reduced in coherency with the DAL reduction. For example if an equipment has a malfunction or loss of function assessed as major in the FHA, the NORSEE policy would accept a DAL D requirement for the equipment and the associated requirement for the maximum probability of occurrence accepted as 10-3/hour. Should the associated requirement of probability of occurrence be kept as 10-5/hour, the NORSEE policy would lead to install 2 equipment DAL D instead of one, which would not induce any cost benefit for the operator or helicopter owner.	<p>- (§ 1): <i>‘When an applicant shows and the FAA agrees that the NORSEE system under consideration provides an overall safety benefit for installation in the rotorcraft model, a one level reduction in DAL may be authorized and he associated requirement for the maximum allowed probability of failure or malfunction may be increased in coherency with the DAL reduction.’</i></p> <p>- § 1 b.: <i>‘If the FAA accepts this system’s classification as NORSEE, this policy allows system approval, satisfying only DAL C with level C software or AEH, and allows that the associated requirement for the maximum allowed probability of failure or malfunction of this system is increased to 10-5/hour, even though the FHA classification remains at hazardous.’</i></p> <p>- § 2. <i>‘In cases allowing this DAL and associated requirement of maximum probability of failure or malfunction relief ...’</i></p>	higher than “minor”. Only the malfunction hazards would be allowed to assessed, and if an adequate showing of increased net safety is shown, would the option to reduce the DAL be available by this NORSEE policy. The changes suggested were not incorporated, as that level of detail would be presented, assessed and accepted on a case by case, project by project basis.
Eurocopter & American Eurocopter	Pg 2, Policy, para 1.	The list of quoted guidance material does not include those quoted in § ‘Current Regulatory and Advisory Material’ (ARP 4761, DO-178B, DO-254).	To complete the list of existing guidance material with the other references quoted in the § ‘Current Regulatory and Advisory Material’ (ARP 4761, DO-178B, DO-254).	Not adopted; the policy, as written, lists some of the more often used, but has the caveat “including, but not limited to” referenced guidance. The applicant has the responsibility to either utilize guidance that is acceptable to the authorities, or present some other means.

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				This policy does not change that requirement, or the applicant’s option to choose a path of their own making.
Garmin	Pg 2, Policy, para 1.	<p><i>“This process will utilize an issue paper to document the determination of DAL reduction authorization(s).”</i></p> <p>An issue paper (IP) is burdensome, time consuming, and expensive. The notion of the policy is to promote safety by installing safety enhancing equipment, yet the use of an IP is a non-trivial investment that will raise costs to accomplish the installation such that some safety enhancements will not be accomplished.</p>	<p>Remove this sentence and rely on the FAA project management to 1) make determinations of NORSEE in concert with the applicant, 2) Where appropriate and justified allow the ACO project lead to make a determination of NORSEE. If issues/questions arise that require additional RD involvement, then the IP process would occur to adjudicate the issues.</p>	Not adopted, but intent addressed; the issue paper process is necessary only for those projects that have not already been assessed, reviewed and agreed to meet the NORSEE criteria. Industry (AEA and GAMA groups) have agreed to work with the FAA to define and substantiate systems that meet the NORSEE criteria. This work is underway, and ongoing. A current listing is being added to the Rotorcraft Directorate public website of those systems that are approved for application of the NORSEE approach. The systems listed will not require an issue paper. Obviously, the ACO will work closely with applicants, to ensure appropriate showing of compliances are made for specific projects.
GAMA, G.J. Bowles	Pg 3, Policy, para 2	GAMA is concerned that this paragraph may confuse the issue of limitations. Because there is an operational tie to certain equipment requirements, it is appropriate to assure that an operator doesn’t mistakenly enter into an operation without the appropriate, required equipment.	Placards or AFM limitations are a good way to prevent this kind of misunderstanding. GAMA believes that this point could be more clearly made by more directly stating this point.	Not adopted; NORSEE needs to be clearly labeled to identify this limitation, however a conscience decision was made to not be “prescriptive” in the method to make these systems “readily identifiable.” That method is left up to the applicant to present, and for the FAA to accept. The use of placards is already noted as an acceptable approach.
Eurocopter & American Eurocopter	Pg 3, Policy, para 2.	We are surprised by the example of the attitude display which is taken because this equipment (horizon) has no DAL requirement	To mention another example than the attitude display in order to highlight the potential benefit of the NORSEE policy.	Not adopted; TSO Approval does not constitute installation approval. Therefore, an aircraft level functional hazard assessment (FHA) would be necessary and utilized to

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		<p>in its FAA TSO and is usually taken with a DAL D requirement for VFR day operations in the safety analyses. In the particular case of the attitude display, the NORSEE policy would not have any effect.</p>		<p>establish the necessary design and reliability requirements. The attitude display serves as one possible example of a system that, in a typical VFR rotorcraft, the known loss of would typically be minor, whereas the hazardously misleading presentation of information to the pilot could be one or two hazard levels higher. In this example, the NORSEE policy would have an effect on the DAL.</p>
Eurocopter & American Eurocopter	Pg 3, Policy, para 2.	<p>NORSEE limitations should be included in a flight manual supplement.</p>	<p>To write 'rotorcraft flight manual supplement' instead of 'rotorcraft flight manual'.</p>	<p>Adopted; change made as suggested.</p>
Eurocopter & American Eurocopter	Pg 3, Policy, para 2.	<p>The policy mentions the requirement of a placard in order to highlight NORSEE equipment on the helicopter. An example of an acceptable placard should be given. It is not said if the placard would be required in addition to the rotorcraft flight manual supplement? Moreover it is not mentioned if the NORSEE equipment will have to be included in the MEL?</p>	<p>The policy should be completed by:</p> <ul style="list-style-type: none"> - providing an example of an acceptable placard, - clarification if the placard will be in required in addition to the rotorcraft flight manual supplement, - mentioning if the NORSEE equipment will have to be dealt in the MEL or not. 	<p>Not adopted; the policy was written so as not to be prescriptive. The determination of what, how, and where those limitations would be stated and displayed, is very dependent upon what the function of the NORSEE equipment is, where it is installed, and how it interfaces with the rest of the rotorcraft.</p> <p>For the MEL, that determination is also very dependent upon what the system being installed does and how it affects rotorcraft operation.</p>
Garmin	Pg 3, Policy, para 2.	<p><i>“If the NORSEE equipment does not meet a technical standards order’s (TSO’s) specified DAL, a TSO approval cannot be granted to that equipment.”</i></p> <p>This seems to confuse the notion</p>	<p>Remove this last sentence to the paragraph since the paragraph communicates well without it.</p>	<p>Partially adopted; sentence was not removed but was modified for clarity.</p>

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		<p>of TSOA and NORSEE status. From our viewpoint, TSOA is completely separate from NORSEE status. It is presumed that a TSO appliance could be NORSEE in one installation but not another. Further an item could be NORSEE with no TSO.</p> <p>It is correct that equipment that carries the TSOA must meet the TSO requirements or have a deviation granted.</p>		
Garmin	Pg 3, Policy, para 3.	<p><i>“If NORSEE software is installed in required equipment (such as an integrated modular avionics) and the DAL of the required equipment is higher than the NORSEE DAL, the software partitioning guidance in accordance with the latest FAA recognized version of RTCA/DO-178 should be followed.”</i></p> <p>The intent of this statement appears to be to require that higher level DAL SW cannot include the lower DAL SW (for NORSEE or otherwise) without appropriate partitioning. However, this is a general requirement that the NORSEE policy would not obviate.</p>	<p>The preference would be to remove item 3. However, if there is a sense the concept must be documented in the policy, recommend changing this statement to the following:</p> <p>“Software incorporating NORSEE components must comply with RTCA/DO-178 partitioning requirements where applicable.”</p>	Intent adopted; added suggested wording to reinforce and clarify.

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GAMA, G.J. Bowles	Pg 3, Policy, para 4	GAMA believes that clarification of paragraph “Policy, 2.” will eliminate the need for this paragraph. As written this paragraph may serve to confuse this policy intent more.		Intent adopted; edited existing paragraph to emphasize that NORSEE approvals carry a limitation that needs to be considered by the applicant and installer, before deciding to take the NORSEE approach vs. a fully compliant approach, to approval.
Eurocopter & American Eurocopter	Pg 3, Policy, para 4.	Precision is needed (see proposal).	To write ‘installation fully compliant with Part 27 or Part 29’ instead of ‘fully compliant installation’.	Partially adopted; paragraph modified to clarify.
Garmin	Pg 3, Policy, para 4.	<p><i>“In cases where non-required equipment is installed in accordance with the hazard assessment determination of the DALs (fully compliant installation, not taking advantage of the DAL reduction), no issue paper would be necessary for that installation. Furthermore, no NORSEE limitations or placards would be necessary.”</i></p> <p>This seems redundant and unnecessary. If NORSEE is not sought and not approved, would anyone anticipate that NORSEE was applicable?</p>	Remove item 4.	Partially adopted; paragraph modified to better clarify the intent (see above comments).
GAMA, G.J. Bowles	Pg 4, Effect of Policy, para 2.	GAMA is concerned that this paragraph could be misinterpreted to mean that anytime an installation doesn’t use the alleviations provided to NORSEE by this policy they must coordinate	GAMA requests that the FAA remove this paragraph as coordination with the policy office is traditional based upon what an applicant is seeking to do. In the event an applicant is seeking greater alleviation for some reason, certainly	Not adopted; this comment is accurate in that the process described is traditional. However, there is no assurance that all readers of this policy will have the same level of understanding of this process in that any deviation from the policy requires

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		the project with the Rotorcraft Directorate.	the ACO will coordinate with the policy office on this kind of issue.	coordination with the ACO and policy issuing office.
Garmin	Pg 4, Implementation	<p><i>“If the date of application precedes the effective date of the final policy, and the methods of compliance have already been coordinated with and approved by the FAA or its designee, the applicant may choose to either follow the previously acceptable methods of compliance or follow the guidance contained in this policy.”</i></p> <p>It seems redundant to restate this in the policy if it is always the case.</p>	Remove this sentence from the Implementation paragraph.	Not adopted; this comment is accurate in that the process described is traditional. However, there is no assurance that all readers of this policy will have the same level of understanding of this process.
Garmin	Pg 4, Conclusion	<p><i>“Following this policy, the safety determination for findings of compliance can be made for the product installation. “</i></p> <p>It is not clear what a “safety determination for findings of compliance” consists of.</p>	<p>Consider:</p> <p>Following this policy, the required DAL of some non-required equipment can be a lower DAL than is possible without this policy and still meet safety requirements.</p>	Partially adopted; modified the sentence to clarify the conclusion of the policy.