

**Maximum Payload Capacity Policy Statement  
Disposition Table**

<b>Commenter</b>	<b>Comment</b>	<b>Requested Change</b>	<b>Disposition</b>
Neil Berryman, Atlanta ACO	<p>Even though it is not a TC'd model yet, it would be useful if the new model GVI could be added to the list of models that are considered to have a maximum payload capacity of less than 7,500 pounds. Perhaps this could be done with some sort of note or asterisk that states "Once certified" (or similar).</p> <p>As advertised, the GVI is intended to have a max payload of 6,500 lb as opposed to the current GV-SP max payload of 6,200 lb.</p>	Add G-VI to the model list	Added G-VI to the model list.
Bombardier	Bombardier strongly supports the intent of the policy as written.	No change requested.	No action.
Bombardier	Correct the model references in the list of affected aircraft.	<ul style="list-style-type: none"> <li>• Delete "Bombardier Global Express (BD-100-1A10)", replace with "Bombardier Challenger 300 (BD-100-1A10)"</li> <li>• Delete "Bombardier Global 5000 (BD-700-1A10, BD-700-1A11)", replace with "Bombardier Global Express (BD-700-1A10)"</li> <li>• Insert "Bombardier Global Express (BD-700-1A10)".</li> </ul>	Verified that proposed change by TCCA addresses Bombardier's comment. TCCA comment on this subject has been incorporated.
TCCA	There are some errors in the model designations for the Bombardier models.	<ul style="list-style-type: none"> <li>• Bombardier Global Express (BD100-100-1A10) should be Bombardier Challenger 300 (BD-100-1A10)</li> <li>• Bombardier Global 5000 (BD-700-</li> </ul>	Change incorporated as requested.

		1A10, BD-700-1A11) should be Bombardier Global Express and Global 5000 (BD-700-1A10, BD-700-1A11)	
TCCA	<p>This policy seems to focus only on Gulfstream and Bombardier business jets although the same premise could apply to any business jets.</p> <p>Concern that other similar airplanes not listed would be required to “go through the legal process of applying for an exemption.”</p>	State that for other similar airplanes not listed in the policy memo, a representative configuration will be used to determine the payload.	The FAA is not aware of other similar airplanes not identified in the policy memo, and is concerned about not having visibility of this policy being applied to other models. The memo has been revised to state that if the FAA becomes aware of other similar models, that we will issue a clarification letter and update the memo, if appropriate.
GAMA	Supportive of the policy.	No change requested.	No action.
GAMA and Embraer	The policy speaks to the applicability of SFAR88 and part 26 as referenced to the payload capacity established during original certification. SFAR88 has no such limitation so that post-TC reduction of maximum zero fuel weight to produce a payload of less than 7,500 lbs. would exempt the affected design from complying with SFAR88. This part of the policy is not consistent with the regulation.	Clarification requested.	It was not the intention of the FAA for an applicant to not have to comply with SFAR 88 by lowering the max payload capacity for a specific airplane. However, since SFAR 88 shouldn't need to be applied to future applicants, and for simplicity reasons, applicability of SFAR 88 has been removed from this memo.

<p>GAMA and Embraer</p>	<p>The background information and the policy section are written in terms that appear to be generally applicable, but the conclusion mentions only specific models.</p>	<p>Clarification of the applicability of this policy to explain that this model list is representative or inclusive. If the policy is representative, request clarification that those characteristics which define those examples (TC'd payload capacity within XXX of 7,500 lbs for example). If the policy is limited solely to those models listed, provide an explanation of why the policy is limited.</p>	<p>The FAA is not aware of other similar airplanes not identified in the policy memo, and is concerned about not having visibility of this policy being applied to other models. The memo has been revised to state that if the FAA becomes aware of other similar models, that we will issue a clarification letter, and update the memo, if appropriate.</p>
-------------------------	---	--	--

<p>GAMA and Embraer</p>	<p>The policy says that increases in zero fuel weight done by the TC holder will have to be assessed to see whether the modification will increase the payload above 7,500 lbs. This policy would result in two different certification standards, and two different levels of safety, depending on the applicant and/or the method of certification (TC vs. STC). GAMA agrees with the FAA’s goal of assuring appropriate configuration flexibility with respect to products which weren’t intended to be addressed by the additional DAH responsibility regulations.</p> <p>It is not an acceptable solution to limit that flexibility to those who are not the TC holder as this creates an unreasonable difference in capabilities between TC/STC holders. This difference is not supported by the applicable regulations, nor is it fair or reasonable to have different certification standards based only on the applicant.</p>	<p>Suggest the FAA determine some threshold for which the product which is being changed was not the type intended for application of design approval holder rules and include this in the policy as without this, the questions created by this policy will be great than those resolved.</p>	<p>If STC applicants were held to the same standard as TC holders for an increase in max zero fuel weight, such that the change pushed the max payload capacity above 7,500 lbs, the STC holder would still not be able to comply with part 26 as the STC applicant needs data from the TC holder. As stated in the memo, it was never the intention of the FAA to require an STC applicant/holder to comply with part 26 and not the TC holder. The TC holder has the data and capability to accomplish the analysis which is required to</p> <p>If the policy does not require a re-evaluation when the TC holder increases the max zero fuel weight, then the policy would conflict with the part 26 rule, which specifically states, “as a result of the original certification, or later increase in capacity.”</p> <p>No change made.</p>
-------------------------	--	--	---

