

Comment Table (Public Comments)

Proposed Policy Statement – AML STC Approval of Rotorcraft Avionics Installations (ASW-100-09-001)

Organization	Page & Para. No.	Comment	Reason for Comment	Suggested Change	Comment Resolution
<p>Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)</p>		<p>General Comments: GAMA is pleased to see the FAA Rotorcraft directorate is working to implement more efficient STC approval processes to address forthcoming challenges such as NextGen equipage. An efficient AML-STC process, implemented across FAR parts, will be critical to assuring avionics installations are available for the multitude of aircraft and models that must be equipped in the near term. GAMA welcomes the acceptance of the AML-STC by the Rotorcraft Directorate but GAMA is very concerned with the details of this particular proposed policy. It seems the process being proposed for Rotorcraft AML-STCs of avionics does not contain appropriate efficiency enhancements but rather prescribes a multi-model STC process and names it the “AML-STC” process. The proposal does not leverage the power of the AML-STC but rather places unnecessary and repetitive restraints on it such as the requirement to document testing by specific model in the STC material. The power of the AMLSTC is the ability for the holder to grow the model applicability list by analyzing that the testing performed previously is</p>			<p>General comments have been noted and specific comments referenced to specific parts of the draft policy are addressed below.</p>

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		<p>applicable allowing a simple revision of the model list without re-opening the STC package. Under this policy, for example, an applicant may find it more efficient to simply pursue an STC for individual aircraft makes/models, or to pursue follow on field approvals, as the overall work associated with adding a new model to the AML appears as though it will be comparable to pursuing one of these more traditional approval methods.</p> <p>The proposed policy contains no discussion of a model qualification process or an aircraft analysis to determine applicability of the data to additional aircraft. The process described in this memo requires complete duplication of all installation data, type design data, RFMS and ICA for each model. This is an increased burden on the ACO, AEG, and the applicant and it also makes maintenance of the STC impractical. Avionics represent a unique modification to an aircraft, the integration of avionics is more a factor of systems installed within the rotorcraft than the actual model of rotorcraft. Avionics installations or type design specifications share more easily over a wide variety of</p>			

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		<p>models then other STCs. GAMA believes the direction of this policy should be changed to better leverage the capabilities of the AML-STC and to be more conducive to efficiency.</p> <p>This restrictive philosophy can be found throughout this Policy in the form of requirements that the applicant provide specific installation data for each make/ model. The policy does not discuss the possibility of pursuing a more generic approach to defining installation requirements and limitations, such as, for example, requirements for selecting a suitable installation location, wire routing, shielding, power sources, etc.. The apparent desire that AML-STC applicants provide model-specific installation data (as opposed to generic installation data that can be applied repeatedly across multiple models) is counter to philosophy of the AML-STC. For example, under this proposed policy:</p> <ol style="list-style-type: none"> 1. HIRF and EMI requirements for each individual model must be addressed in the AML-STC, considering things like wire harness routing and structural considerations. A more generic approach of defining criteria to 			

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		<p>evaluate routings and EMI does not appear acceptable. For example, completing HIRF testing while taking no credit for aircraft shielding will assure HIRF compliance independently of the aircraft make/model.</p> <p>2. A model specific SSA is required for each model on the AML-STC. An alternate approach would be to prepare a generic SSA that considers and addresses the requirements of all models on the AML-STC. Limitations in the installation data can assure a homogeneous installed configuration or configurations that satisfy all the assumptions of the generic SSA. A model specific SSA is the approach suitable to single make/model STCs.</p> <p>3. Differences in the installation of the equipment must be identified for each model, as opposed to establishing limitations that must be adhered to when equipment is installed in any model.</p> <p>4. Limitations must be established for each model, as opposed to generic limitations for all models.</p> <p>5. Antennae locations must be established for each model, as opposed to establishing selection criteria for installation of the antenna that are not model specific.</p>			

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		<p>6. The AML-STC must list all equipment tested to function properly with the system being installed, on each model on the AML-STC. This is essentially a single make/model approach.</p> <p>7. Provide a RFMS for each model, as opposed to creating a RFMS that can be applied across all models.</p> <p>GAMA believes the AML-STC process for avionics will play a key factor in bridging the gap between the traditional STC and the field approval process for fixed wing and rotorcraft aircraft alike. With many years of experience applying the AML-STC to part 23 avionics approvals, the Small Airplane Directorate has put in place policy and practice that assures a robust, repeatable AML-STC method to facilitate the installation of the latest generation of safety-enhancing technologies into older aircraft. In fact, the <i>Part 23 Small Airplane Certification Process Study</i> published this past summer contains a number of recommendations to make the process even more robust while remaining very efficient. GAMA suggests the FAA Rotorcraft Directorate review these recommendations to assist in</p>			

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		<p>shaping appropriate policy in this regard.</p> <p>Experience with the AML-STC suggests that this process requires increased engineering effort, for both the FAA and applicant, during the initial approval cycle. However, this increased effort can result in significantly reduced costs to the FAA, the applicant, and to aircraft operators by eliminating repetitive work associated with processing multiple substantially identical follow-on STC and Field Approvals for virtually identical installations in different aircraft makes/models. By demonstrating through analysis, test, or otherwise, that the AML-STC data can be applied across multiple aircraft makes and models the AML-STC approval process facilitates technology insertion, which itself has significant safety benefits.</p>			

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 1, Current Regulatory and Advisory Material	GAMA agrees that showing complete compliance to the modification and providing enough relevant information such that a filed installation can reproduce the equivalent performance and safety aspects of the modification is required, however we request a clear definition on the type design required and the fidelity of the data.	The rotorcraft Directorate should provide a better definition of type design data. It should be acceptable to specify a process or modification where the installer (FAA repairman) determines the direct applicability to the model.	Not adopted. Type Design is defined in 14 CFR 21.31 and by definition would prevent the suggested method of allowing the installer to determine applicability of the design to each model. Showing compliance with all applicable certification regulations is the responsibility of the applicant. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Relevant Past Practice	This section states: “The AML STC process has sometimes been incorrectly seen as an abbreviated path to obtain installation approval on multiple models and types of rotorcraft.” and “The purpose of the AML STC is to allow a convenient packaging of data for multiple models of rotorcraft for which certification compliance has been shown.”	GAMA takes exception to this statement as the AML STC is more work then a single model STC, but should be less work then creating two complete, and three complete STC’s etc. There must be a reduction in duplicate data, and the installer must be able to determine the data applicability in each modification.	GAMA strongly recommends the FAA address this concept throughout this proposed policy.	Not adopted. The AML STC policy does allow consolidation of common data, thus reducing duplication of that data. However, any difference in the installation or instructions for continued airworthiness between each model needs to be clearly defined and not left up to the installer to determine so that compliance with all applicable regulations is shown for each model prior to approval of the AML STC. No change.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Relevant Past Practice	This section states: “It is necessary to show compliance with every applicable regulation for each rotorcraft model included on the AML STC.”	GAMA believes compliance should be limited to the modification. A review of the modification should be made such that the applicable area in the current regulations are adequately addressed. Alternately, if the current regulations can not be met the applicant may re-substantiate the modification to the helicopters original certification basis. Further this statement seems to miss the point of the AML-STC in that follow-on model applicability could be demonstrated without revising the STC data package.	GAMA recommends the FAA revise this statement to be more conducive to a multiple model installations and to address the concept that an STC applies compliance beyond the modification.	Not adopted. The introduction of a type design change mandates that the rotorcraft show compliance with all applicable regulations affected by the modification. This can be done by a number of methods, to include analysis, but must be addressed for each model being approved on the model list to the STC. No change.

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<p>Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)</p>	<p>Pg 2, Policy Intro</p>	<p>This section states: “Avionics that incorporate complex integration with existing systems such as global positioning, autopilot, and navigation, are considered to be very rotorcraft model specific. Only when these complex systems have been completely tested, evaluated, and documented for each specific model, would they be considered appropriate for an AML STC.”</p>	<p>Such a statement is overly restrictive and does not allow the holder to add applicable models to the STC without re-opening the STC data package to add model specific information. Complex systems may require additional testing, or complex installation instructions and complex post installation check outs. These must be considered independent to the aircraft model and independent to the requirement to flight test each specific rotorcraft model. For example, the statement requires a specific make/model STC for an EFIS system, and would not enable EFIS approval under the AML-STC process. An additional example would be the A/P which is considered specific to the rotorcraft model, however providing outer loop data, like standard 150mv right/left of course deviation signals, do not constitute complex integration.</p>	<p>The FAA must include a model qualification process in this policy, otherwise it is simply creating more multi-model STC policy.</p>	<p>Not adopted. The complexity of integration of these systems into different models of helicopters, with different flying qualities and limitations is precisely the point of the policy statement. The applicant is responsible for showing compliance with all applicable regulations for each model that is included in the AML STC. Only after such compliance is shown, can the AML STC be issued for any given model(s). No change.</p>

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Policy Intro	The process being described by this section is the method used in a multi-model STC which is very different than an AML-STC.	GAMA believes this concept is incorrect and the AML-STC process being proposed has very limited benefit.	In light of what has been accomplished in part 23 and the needs of NextGen equipage across the fleet, the FAA would be missing a gigantic opportunity if they go forward with this policy as proposed.	Not adopted. The rotorcraft AML STC policy is aligned with the FAA Order 8110.4C, Section 4-13. The AML STC was not intended to waive the need for showing of compliance to all applicable regulations. The AML STC is a multi-model STC that provides a convenient method to be applicable to more than one type certificate data sheet set of models, provided adequate showing of compliance to the regulations by all models on the approved model list is shown and documented. If proper planning is done up front, the benefits of an AML STC can be utilized. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Policy Intro	This section states: “Only when these complex systems have been completely tested, evaluated, and documented for each specific model, would they be considered appropriate for an AML STC.”	Nearly all avionics systems testing can be performed on the bench. In addition flight testing in one model can very often qualify its operation in another aircraft model.	GAMA believes this statement should be removed and an appropriate model qualification process should be included in this policy.	Not adopted. Flying qualities and flight limitations of rotorcraft are significantly different between rotorcraft models and vastly different than small airplanes, which is precisely why testing may need to be performed for each model. Analysis of these differences must be substantiated with demonstrated results, as installed. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Policy Intro	This section states: “Avionics that are more generic, with broad application across many rotorcraft models, may benefit more from the AML STC process.”	GAMA believes that the word “generic” does not adequately address this issue. The point of the issue should not be whether the article is “generic” or “complex” but how many airframe dependent integration issues are involved.	GAMA recommends this concept be adjusted to address airframe dependent integration issues rather than discussing “generic” and “complex” avionics.	We concur; the term “generic” is not the best descriptive word in this application. The description will be changed to incorporate the term “simple,” to better reflect the level of integration required with other systems on the rotorcraft.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Policy 1	This section states: “However, the compliance data package may be used to show compliance for multiple models on the AML if the similarity between the models is adequately shown and documented.”	GAMA believes this concept is at odds with an efficient AML-STC process and therefore GAMA recommends the inclusion of a model qualification process and aircraft analysis to document similarities.	Not adopted. The section under discussion is aligned with Order 8110.4C, Section 4-13. The model qualification process and aircraft analysis recommended would be the product of the completed compliance data package for the models included on the AML to the STC. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 2, Policy 3	This section states: “The AML STC certification basis should not include a combination of Civil Air Regulation (CAR) 6, 14 CFR part 27, or part 29 rotorcraft, (for example, one AML STC might include CAR 6 rotorcraft, while another AML STC might include part 27 rotorcraft, and yet another might include part 29 rotorcraft).”	Most models of helicopters have a mix of CAR 6 and part 27 regulations on their TCDS. Some mix FAR 27 and FAR 29. GAMA believes AML-STC policy should permit helicopters with mixed cert basis but limit an AML-STC to models with a <i>primary</i> cert basis of CAR 6/FAR27 or FAR 29.	GAMA recommends the above statement be modified appropriately.	We partially concur; verbiage has been modified to clarify that inclusion of models certified to different rules, even though included on same TCDS, would require careful attention to all the differences in the certification basis.
Cobham Avionics (Christopher Meyrick)	Pg 2, Policy 3.	The purpose behind the reference to IFR certified rotorcraft in item 3 is a bit unclear.	The policy clearly says that a single AML STC should not split across CAR 6/Part 27/Part 29 cert basis, and that it should not split across Standard/ Restricted category rotorcraft. This reference to IFR could be interpreted as either meaning that it the AML STC should also NOT split across VFR/IFR rotorcraft or that a combination of VFR/IFR rotorcraft MAY be on the same AML STC hence the application of the regulations must be considered separately.	(none)	We concur; the text was modified to explain the reference to IFR rotorcraft may cause certification issues since some serial number examples of any particular model may be IFR certified and/or Category A, and other serial numbers of the same model may not, and this would preclude the use of a single certification basis for those models.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 4	This section states: “Standard category (i.e., Normal and Transport category) and Restricted category rotorcraft should not be included on the same AML STC, because the certification basis may be significantly different.”	GAMA believes it is immaterial with regards to avionics if the aircraft is in restricted category or not. GAMA agrees that Normal and Transport should be separated by their appropriate FAR part (27 or 29).	GAMA recommends the FAA permit the inclusion of Helicopters which operate in restricted categories with other categories on the same AML-STC.	We concur; clarified that as long as the restricted category is held to the same standard as the standard category (i.e., a transport restricted rotorcraft and a standard transport rotorcraft) they could be included on the same AML STC.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 5	This section states: “Clearly identify the certification basis, including amendment levels, for each of the listed rotorcraft models in the certification basis document for the AML STC.”	GAMA believes the minimum acceptable certification requirements are to identify the cert basis and amendment level of the rotorcraft model and to show compliance to that level. It should be acceptable to meet the current FAR and amendment level for which the modification is made. Using the AML-STC processes it is easier to claim compliance to all models if the modification adheres to the latest FARs and Amendment levels.	GAMA recommends this section be revised to reflect this concept.	We concur; text was added to the policy to offer applicant meeting the latest amendment level as an alternative to establishing certification basis on each earlier basis.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 6	This section states: “The AML STC applicant must show the means of compliance for each of the regulations listed in the certification basis for each model.”	(none)	GAMA suggests the FAA reword this sentence as follows for clarity: “The AML STC applicant must show the means of compliance for each of the regulations affected by this modification.”	Not adopted. The introduction of a type design change mandates that the rotorcraft show compliance with all applicable regulations. This can be done by a number of methods, to include analysis, but must be addressed for each model being approved on the model list to the STC. No change.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 7	This section states: “The AML STC applicant must determine the specific installation requirements for each model.	Sufficient guidance must be provided to the installer to allow the installation to be accomplished in a correct and repeatable manner for each model on the AML.”	GAMA requests better clarification of “Sufficient guidance” and “correct and repeatable”. GAMA believes this information is commonly covered in the data submittal and review of the data by the ACO.	We concur; clarified that guidance must be sufficient to show compliance to the type design for each model on the AML.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 7	This section states: “As part of the certification data for showing compliance, identify and address any differences in the approved rotorcraft models that can have an effect on the acceptability of the installation.”	Frequently with regard to avionics systems, most of the variance occurs between the systems being installed and not in particular rotorcraft model difference. Compatibility and system compliance data should be used for determination of acceptability and a well developed model qualification process should address applicability between rotorcraft models.	GAMA recommends the FAA update this policy to reflect these facts.	Not adopted. The variance between systems needs to be addressed by the applicant as part of the type design and shown as the differences between models and installation configurations that applicant chooses to include on the AML STC. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 7	This section states: “The AML STC will require engineering data to determine proper fabrication, installation, and any other specific instructions by model type and configuration for each model listed in the AML list.”	GAMA agrees that the AML STC will require engineering data, but the majority of avionics installation data does not differ by model. Data should be developed by task and not necessarily driven by rotorcraft model as this allows for the proper level of flexibility.	GAMA suggests the FAA update this section to reflect this concept.	Not adopted. The applicant has the responsibility to present a data package that consists of a principal design and certification data package for the change and either a master installation package or a separate installation package for each eligible TC'd product. Also, AML STC is not intended to only address avionic installations. No change.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 7.a.	This section states: “Address parts 27 and 29 high intensity radiated field (HIRF) and electromagnetic interference (EMI) requirements for each individual model being included on the AML STC. This is necessary because of the differences in levels of airframe attenuation, wire harness routing, structural differences, and their potential effects on different installed equipment.”	For other avionics approvals, this guidance seems to require much more in the way of model specific installation information than has been needed for our part 23 AMLs. For example, for HIRF, generic HIRF requirements are not allowed and the HIRF regulation was intentionally designed with HIRF testing levels that don’t rely on varying levels of airframe attenuation. Seeing as the AML-STC process should certainly leverage the flexible features of existing regulations, the direction of requiring model specific HIRF testing seems to be inappropriately applied. A correct application would allow testing of HIRF at some level and then follow-on analysis to assure that level tested is appropriate for follow-on models which are added to the applicable model list.	GAMA recommends the FAA address this section in a manner which is more beneficial to streamlined certification, clearly this can be done as it is done in the TSO world on a regular basis. AC 20-158 includes applicability of this concept and the issue of HIRF is fully addressed in that guidance. This policy should reference AC 20-158 and not include limitations such as HIRF analysis on each airframe when other methods assure safe and proper installation irrespective of airframe attenuation.	Not adopted. Reference to AC 20-158 is included in the policy. Each model’s requirements need to be addressed and AC 20-158 is an acceptable way (but not the only way) to show compliance to the applicable HIRF rule. The applicant may choose another method, that is acceptable to the FAA. No change.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 3, Policy 7.a.	This section states: “Very prescriptive installation instructions will need to be included in the data package for bonding, strapping, connectors, backplanes, wire routing, shielding, etc.”	It is unclear why wire routing affects HIRF and IEL unless the system is determined to include a critical control function or poses a threat to critical controls of the rotorcraft. Installation data should be descriptive enough for the installers to maintain clear of areas like FADEC or lightning diverters. Detailed wiring routings are too restrictive especially for aircraft with many modifications or slight differences from the certification test rotorcraft.	GAMA recommends this statement be revised to address a more appropriate process as explained above.	We partially concur; added statement that HIRF and EMI may be required based on the model specific system safety assessment. Wire routings are a part of the type design and need to be specified for each model included on the AML of the STC.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 4, Policy 7.a.	This section states: “Full authority digital engine control (FADEC) equipped rotorcraft will require showing that the equipment being installed does not interfere with the FADEC.”	The policy should state that this may be met via test or analysis and non-emitting equipment within the DO-160 specifications should be exempt.	GAMA recommends this statement be updated appropriately.	Not adopted. The policy statement does not specify how the showing of non-interference is determined. ACs 27.1B and 29.2C, MG 4, contain specific FADEC EMI certification guidance that may be used. DO-160 qualification alone does not justify an exemption to showing non-interference to electronic controls that provide critical functions, such as FADEC. No change to policy statement necessary. No change.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 4, Policy 7.b.	This section states: “Assess the DO-160 environmental qualification levels (for example, vibration, temperature, altitude, EMI radiation) against the actual installation environment for each of the listed AML rotorcraft models because there may be significant variations from one model rotorcraft to another.”	GAMA believes that the use of robust data (such as Cat U curve G for vibration) should be sufficient for avionics installations in rotorcraft provided installation verification verifies that testing addresses the particular installation.	GAMA recommends this statement be updated appropriately.	We concur; a statement was added to the policy to clarify that equipment qualified to the more robust DO-160 environment levels for helicopters should be sufficient for avionics installations in rotorcraft.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 4, Policy 7.c.	This section states: “A model specific system safety assessment for each model on the AML must be performed and documented in the certification package.”	If the hazards can be properly determined without regard to the specific model then a model specific safety assessment is not needed. Model specific hazards in avionics may be a very small list if any at all.	GAMA recommends the use of a model qualification process to address this issue.	Not adopted. Each model on the AML STC will require a system safety assessment. If the system is such that the assessment hazards are not model specific, then the safety assessment can apply to more than one model. But, as models are added to the AML, a reassessment would be required, hence the decision to leave the policy as written. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 4, Policy 7.d.	This section states: “Electrical wire routing may vary between rotorcraft models and requires consideration of potential consequences to both function and safety for each application.”	For the sake of applicability and efficiency, it is more appropriate to give strict routing directions rather than specific routing locations. In this way the AML-STC can bridge the STC and field approval process.	GAMA recommends the FAA update this policy to reflect this idea.	Not adopted. The type design for each model on the AML must include the installation instructions as to how to route the wires. Deviations from the STC would need additional oversight and approval. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 4, Policy 7.e.	This section states: “As a minimum, clearly state any limitations on the face of the STC and at the beginning of the installation instructions for each model that the limitations apply.”	GAMA finds that everyone in the FAA wants their particular “data” in the beginning of the installation manual and there are competing statements throughout various policy and guidance.	GAMA recommends listing limitations in the limitation section of the manual.	Not adopted. Placing limitations on the face of the STC brings these to the attention of the installer before the modification is initiated.

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Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 5, Policy 7.g.	This section states: “Compatibility of interfaced equipment must be determined and included in the AML STC.”	GAMA agrees with this statement, but for clarification: Interface compatibility should be allowed to be demonstrated by one of numerous means including company test, prior A/W approval, TIA flight test for the project, prior TIA flight test, or analysis as long as it is sufficiently documented in a compatibility report.	GAMA recommends this section be updated accordingly.	Not adopted. Agree with GAMA as to the various methods to determine compatibility. Compatibility must be shown. How that is shown, must be clearly identified by the applicant and proposed to the ACO. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 6, Policy 10	This section states: “Introducing new or changing existing cockpit procedures or configurations to a previously approved IFR or Category A rotorcraft will require an assessment and possible flight evaluation for approval.”	GAMA believes this statement is too open ended and broad, as some caution is appropriate here – it depends on the nature of the equipment being installed. There are many items which may change a configuration in a very minor way which can be completely evaluated on the ground.	GAMA suggests changing the word “will” to “may”.	Not adopted. Changes to cockpit equipment or procedures will require an assessment. Once that assessment has been made, the decision as to what will be required for approval can be made. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 6, Policy 11	This section states: “If a rotorcraft flight manual (RFM) supplement is necessary, an FAA approved RFM supplement will be required for each model on the AML STC.”	If there are no identified aircraft model type specific operations a single RFMS should be suitable for multiple models. It becomes difficult to distribute and maintain identical documents for multiple models and if it is not warranted for valid reason, it should not be required. The model on the RFMS does not address the system configuration difference.	GAMA recommends a check mark configured RFMS such that the FAA has approved all the configurations that can be foreseen and which are covered by the STC. The installer then completes the RFMS in accordance with the STC installation instructions.	Not adopted. 14 CFR Part(s) 27/29.1581(b) addresses the sections of the RFM that must be “furnished, verified and approved” and this includes Part(s) 27.29.1585, which is operating procedures. Thus, the statement in the current policy is correct and in accordance with the regulations. No change.

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Organization	Page & Para. No.	Comment	Reason for Comment	Suggested Change	Comment Resolution
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 6, Effect of Policy	This section states: “This is to ensure that the applicant understands that all applicable regulations must be complied with for each model and to agree on the models that can be combined on a single AML STC.”	This statement seems to indicate that the Rotorcraft Directorate sees the AML-STC as a means to skip compliance to the regulations. Obviously this is not the case, no policy can obviate regulatory compliance.	GAMA recommends the FAA remove this material.	Not adopted. The subject statement was included in the draft policy precisely because some applicants have misunderstood the intent of the AML-STC policy as stated in Order 8110.4C, section 4-13. Compliance must be shown prior to approval of the AML STC. No change.
Gregory J. Bowles, General Aviation Manufacturers Association (GAMA)	Pg 7, Conclusion	This section states: “An AML STC does not relieve the applicant from showing compliance with all applicable regulations for each model rotorcraft listed in the proposed AML STC.”	Obviously no policy can obviate regulator compliance. Statements like these are not found in AC23-22, <i>Guidance for AML STC approval of Part 23 Airplane Avionics Installations</i> .	GAMA recommends the FAA remove context related to the AML STC being an approval processes which does not comply with the required regulations.	Not adopted. See preceding comment resolution statement. Also, AC 23-22 specifically excludes Part 25, 27 and 29 products, therefore what is, or is not stated in that part 23 AC is not applicable to products approved under the other parts. No change.