

		<b>DISPOSITION OF PUBLIC COMMENTS ON PROPOSED POLICY STATEMENT ANM-113-04-032, IVS CERTIFICATION</b>

	<b>Commenter</b>	<b>Comment</b>	<b>Disposition</b>
1	Yuichi Kitada, JAL	What kind of documentation should be prepared after a design review of the type design data by the applicant?	For abuse load testing, the policy has been revised to state that § 25.601 is not applicable unless an IVS is shown to be hazardous. The FAA recommends using ARP5475 in these cases.
2		Should FAA engineer or designee review the results of a design review of the type design data and/or similarity report?	A compliance determination is the responsibility of the FAA or their designee, however recognizing that the systems have not been shown to be hazardous should be used to determine what level of review should be needed.
3		If a DER may review the data, in which technical discipline(s) should review the results of a design review of the type design data and/or similarity report?	The DER who is designated with finding compliance with the reference regulations is appropriate.
4	W. DeRosier, GAMA	Industry's position has been that there is no data to show that IVS systems are hazardous and/or unreliable.	As noted in the comments provided, the FAA concurs and stated in the proposed policy that "... for designs that have been previously certified or do not have any features which are shown to be hazardous, no further assessment as to the abuse load capability is needed." This statement has been revised to clearly state that § 25.601 is no longer applicable.  It should be noted that although the IVS currently in service have not been shown to be hazardous, these IVS have stabilized due to the abuse load testing performed prior to 2001 when Industry provided data to the FAA. These early systems failed abuse load testing with potentially hazardous results.
5		IVS design for abuse loads should be a recommended practice only and not a certification requirement	Part 25 policy is meant to guide the applicant in meeting the regulations. This policy guides an applicant on how to meet the regulations, the ARP is one means of compliance.  As noted in the previous comment, no abuse load testing should be needed unless a design (basic characteristics) is questionable or has been shown by experience to be a hazard. In those cases the aerospace recommended practice is an acceptable means.  The FAA believes the proposed policy was consistent with the presentation to the FAA in May 2001. Changes to the proposed policy should more clearly indicate the FAA's intention.
6		The policy goes on to describe the use of design reviews and similarity reports to previously tested designs as sufficient means of compliance. This	Current methods of compliance involved testing or demonstrating similarity to a tested system and documenting this in a similarity report.

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		does not change the current methods of compliance.	This discussion has been removed from the proposed policy. The determination of hazard or questionable design details may be left to the applicant, otherwise no tests are required.
7		Draft policy does not add acceptable methods of compliance or clarify questions	<p>The proposed policy adds design review (or inspection) and analysis as acceptable means of compliance.</p> <p>The policy adds analysis and design review (inspection) in lieu of the testing for meeting other applicable regulations.</p> <p>Although not directly, addressed by the commenter the proposed policy also adds these methods of compliance for the aspects of IVS other than abuse load testing. With the clarification added regarding inspection, this aligns exactly with the request made by Industry in May 2001.</p>
8		[Draft policy].. could add additional complexity due to the addition of more guidance on top of three policy memorandums	<p>This policy states that “[t]his document refers to previously issued policy as needed and therefore, may be used as a single source reference for IVS certification.”</p> <p>This statement was included to address this particular concern while not invalidating the methods of compliance previously found acceptable.</p>
9		Industry does not see how the draft policy will provide a means to reduce the regulatory burden for IVS	<p>As noted in the previous comments the FAA feels that this policy relieves the applicant of performing abuse load tests based on the data presented by Industry (i.e., experience).</p> <p>Based on these inclusions the FAA has met the request of Industry made in May 2001 and accepts that the streamlining benefits which were communicated have been met.</p>
10		Industry strongly recommends that the FAA reconsider its position requiring abuse load justification for certification.	<p>The policy has been clarified as noted. There is no need to reconsider our position as this policy removes the need for abuse load testing of non-hazardous systems.</p> <p>Compliance is shown by experience.</p>
11		<p>Industry recommends the following wording for the policy:</p> <p><b>Policy</b> Based on the service history data Industry has presented to the FAA, IVS designs have shown that they are reliable and non-hazardous. Therefore, the need to demonstrate the suitability of in-arm video systems for compliance to §25.601 is no longer required.</p>	<p>The first and last paragraphs are already included. The middle paragraph only speaks to the need for abuse load testing. Additional material would need to be included to address compliance to the other reference standards.</p> <p>As part 25 policy is provided as a guide to meet the regulations, the last statement in the second paragraph implies that the Transport Airplane Directorate recommends ARP5475 for potential abuse loads to meet the required</p>

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		<p>The Society of Automotive Engineers has issued an Aerospace Recommended Practice (ARP) that addresses in-arm video system abuse load testing. This document, ARP 5475, represents the Industry recommendation for making an assessment of the injury potential for a video system. The Transport Airplane Directorate recommends the use of ARP 5475 for potential abuse loads.</p> <p>In recognizing the non-hazardous and reliable nature of IVS systems, this policy will provide a means to reduce the regulatory burden for IVS certification by simplifying the certification process with no adverse effect on safety. If other data were to be presented which demonstrated otherwise, the intent and content of this policy would be reconsidered.</p>	<p>standards.</p> <p>This is more than the Directorate feels is needed to comply and appears to be contrary to the Industry position.</p> <p>No abuse load testing is needed, i.e., demonstration of compliance to § 25.601 is shown by experience. When a design is questionable or has been shown to be hazardous, the ARP is one means of acceptable compliance.</p>
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