

Clearance Record
DOCUMENT COMMENT LOG
PUBLIC

Originating Office: AIR-120	Document Description: TSO-C23f – Revision of TSO-C23d, Personnel Parachute Assemblies and Components	Reviewing Office: AIR-120	Date of Review: 9/12/2012	Date of AIR-120 Disposition: 9/12/2012
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Company & Group	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
PIA x 2	PIA TS 135 Page 11, § 4.3.9.1	Do not disregard § 4.3.9.1. “Rate of Decent Tests (Method 2)”	It is indented for “high level” of users using “high performance” parachutes canopies.	Retain § 4.3.9.1.	We do not agree: We omitted the Method (2) testing, for not providing an equivalent level of safety to current standard. This method is directed at high performance and experience parachutists in sport and skydiving activities. Novice or less experienced parachutists in emergency conditions due to incapacitation, panic, etc., may not be able to safely deploy and land. We have to consider the safety of all jumpers, not just the highly skilled, highly experienced. It is argued that the risks the experienced jumpers are exposing themselves to, are mitigated by their skill
USPA 1 Skydive x 3 United P.T. 1 US Army 1	PIA TS 135 Page 11, § 4.3.9.1	Do not disregard § 4.3.9.1. “Rate of Decent Tests (Method 2)”	Reserve parachutes would be limited to larger and different sizes, lower wind conditions, and, limiting “sport” parachuting.	Retain § 4.3.9.1.	
US Army	PIA TS 135 Page 11, § 4.3.9.1	Do not disregard § 4.3.9.1. “Rate of Decent Tests (Method 2)”	Eliminating this method is appropriate for “student skydivers, and unconscious jumpers”, but not for “experienced” skydivers.	Retain § 4.3.9.1.	
Performance Designs	PIA TS 135 Page 11, § 4.3.9.1	Do not disregard § 4.3.9.1. “Rate of Decent Tests (Method 2)”	“This method only applies to “experience” trained jumpers. Skydiving is a “high speed sport”. It is critically necessary for certifying new reserve parachutes that can handle the wind conditions that skydivers frequently jump in, and to avoid	Retain § 4.3.9.1.	

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			dangerous situations from miss-matched main and reserve parachutes”.		and experience.
Everest Skydive	PIA TS 135 Page 11, § 4.3.9.1	Do not disregard § 4.3.9.1. “Rate of Decent Tests (Method 2)”	Eliminating this method it will stifle developments in reserve parachutes, for the “experienced” skydivers.	Retain § 4.3.9.1.	To allow the increased velocity may improve the safety of highly skilled, highly experienced jumpers, but it erodes the safety for the beginner, incapacitated, panicked, or a jumper who has gotten himself into a treacherous landing area.
Skydive Long Island Performance Designs	PIA TS 135 Page 11, § 4.3.9.1	Do not disregard § 4.3.9.1. “Rate of Decent Tests (Method 2)”	Eliminating this method it will stifle developments in reserve parachutes in “sport parachuting”, and forced to use reserves to non-matching sizes.	Retain § 4.3.9.1.	We do not agree that a canopy manufacturer can demonstrate that a jumper can safely land with an appropriate control manipulation while performing a flare before touchdown. This approach relies on jumper’s experience to meet the MOPS that parachutes have been certified to. This approach does not provide an equivalent level of safety.
EASP	PIA TS 135 Page 11, § 4.3.9.1	Disregard § 4.3.9.1. “Rate of Decent Tests	EASP endorses the proposed disregarding of § 4.3.9.1 Retain it will be a potential	Disregard § 4.3.9.1.	We Agree.

