

## Public Comment Form

TSO-C201 Attitude and Heading Reference System (AHRS)						
	Commenter (Name, Company, Phone Number, Email)	Page, Section, Paragraph	Comment	Rationale for Comment	Recommendation	Resolution
1.	Garmin	Page 1, subject line	Suggest adding ‘Strap-Down’ before ‘Attitude ...’ in subject line given scope of RTCA/DO-334	Improved clarity regarding scope of new TSO.	Suggest adding ‘Strap-Down’ before ‘Attitude ...’ in subject line given scope of RTCA/DO-334	Not Accepted: Because the term ‘AHRS’ is largely synonymous with strap down AHRS, and the AHRS title is more succinct, the title is not changed. Additionally, Paragraph 3.a. defines the functionality of this TSO. It states that, ‘This TSO applies to solid state strap-down AHRS...’
2.	Garmin	Page 2, par 4.b.(2)	Paragraph 4.b.(2) states:  Each subassembly of the article that you determined may be interchangeable.  This language is confusing.	The language for this requirement is confusing. This could mean that a stuffed printed circuit board needs the TSO number.	Suggest removing the statement or if removing causes problems, work with industry to establish wording that is better understood.	Not Accepted: This language is standardized in accordance with FAA Order 8150.1C and represents current FAA policy.
3.	Garmin	Page 4, par 5.f	TSO paragraph 5.f and its subparagraphs define required information to be supplied to the ACO for a non-TSO function. This guidance is inconsistent with Order 8110.4C CHG 4.	TSO paragraph 5.f indicates that ‘you must ... include the following information with your TSO application’ but the TSO 5.f subparagraphs which specify the required information to be supplied to the ACO for a non-TSO function are inconsistent with the Order 8110.4C CHG 4 paragraph 6-9.b.(3) ‘Manufacturer Data Submittal’ requirements. For example, TSO paragraphs 5.f.(5) and 5.f.(6) require submittal of ‘Results of test/analysis’ while Order 8110.4C CHG 4	Reword to point to Order 8110.4C CHG 4 paragraph 6-9.b.(3). Or if pointing to Order 8110.4C CHG 4 causes problems, adjust the wording in the TSO (template) to be consistent with the 8110.4C CHG 4 intent.	Not Accepted: This language is standardized in accordance with FAA Order 8150.1C and represents current FAA policy.

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				paragraph 6-9.b.(3) requires submittal of “proposed test procedures”; while both sets of guidance use the word “test”, otherwise there is no similarity.		
4.	Garmin	Page 4, par 5.f	TSO paragraph 5.f and its subparagraphs include definition of non-TSO functions and the data to be submitted to the ACO for non-TSO functions. This guidance is inconsistent with Order 8110.4C CHG 4.	TSO paragraph 5.f states “Identify functionality or performance contained in the article not evaluated under paragraph 3 of this TSO (that is, non-TSO functions).” Use of the term “performance” in the definition of a non-TSO function is inconsistent with the Order 8110.4C CHG 4 paragraph 6-9.b.(1) and 6-9.b.(3)(a) guidance regarding how to define a non-TSO function. The issue is non-TSO should not be defined as “performance”. It will create difficulty if these criteria are used. For example, if a TSO requires a minimum 10 watt transmitter and a company makes equipment that is robust at 11 watts, the performance exceeding the TSO is not called out under the TSO; consequently, by the paragraph 5.f “performance” definition, the 11 watt transmitter has a non-TSO 1 watt capability. The distinction of a “function that can be accomplished outside the TSO box” as is specified in Order 8110.4C CHG 4 paragraph 6-9 is critical to making non-TSO function work long term.	Reword to point to Order 8110.4C CHG 4 paragraph 6-9.b.(1) and 6-9.b.(3).(a) for the definition of non-TSO function. Or if pointing to Order 8110.4C CHG 4 causes problems, adjust the wording in the TSO (template) to be consistent with the 8110.4C CHG 4 intent.	Not Accepted: This language is standardized in accordance with FAA Order 8150.1C and represents current FAA policy.
5.	Garmin	Page 6, par 7.b	TSO paragraph 7.b contains wording that is inconsistent with Order 8110.4C CHG 4.	TSO paragraph 7.b includes additional guidance about what furnished data should be provided to an operator or repair station when the equipment includes a non-TSO function.	Reword to point to Order 8110.4C CHG 4 paragraph 6-9.b.(6). Or if pointing to	Not Accepted: This language is standardized in accordance with FAA Order 8150.1C and

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				The problematic guidance states “include one copy of the data in paragraphs 5.f.(1) through 5.f.(4).” This guidance is inconsistent with Order 8110.4C CHG 4. Order 8110.4C CHG 4 paragraph 6-9.b.(6) defines the FAA-industry agreed data that must be provided to an installer when equipment includes a non-TSO function and it would be better if the TSO simply pointed to Order 8110.4C CHG 4 paragraph 6-9.b.(6).	Order 8110.4C CHG 4 causes problems, adjust the wording in the TSO (template) to be consistent with the 8110.4C CHG 4 intent.	represents current FAA policy.
6.	Cessna	4.b.(1)	Cessna request further explanation of what is meant in paragraph 4.b.(1).	Cessna does not understand if the phrase “easily removable” means from the airframe or end item assembly.		The TSO says to mark at least one major component and each component that is easily removable. Easily removable is clarified in the TSO with the “without hand tools” statement. The marking requirement applies if the component is intended to be easily removable from its intended installation or if a subcomponent is easily removable from the major component.