

### Division Comment Metric

<b>Originating Office:</b> AIR-130	<b>Document Description:</b> TSO-C203 Fire Containment Cover (FCC)	<b>Project Lead/Reviewer</b> Joan Hughson	<b>Reviewing Office:</b>	<b>Date of Review:</b> 3/6/2014
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Commenter	Section # & Page #	Comment	Suggested Change & Rationale	Disposition
J.Lee, ANE150	Section 4(c) page 2	The marking requirements should identify the FCC type approved as the testing requirements are based on it.	Add: Type designation of FCC (e.g. “Type I” or “Type II”) Identifying the FCC type would help anyone understand the testing requirements met.	Non-concur. TSO C-203 MPS for Type I and Type II FCCs are the identical. The difference is that in the case of the Type II FCC there are additional flammability requirements (beyond TSO C90) for the net it is attached to.  The marking requirements for the net and the Type II FCC come from unique TSOs so there is no need to incorporate additional marking if the MPS for all FCC is the same.
J.Lee, ANE150	Section 4(c) page 2	The marking requirements of pallets and nets that the FCC may be used with using the IATA size codes would only apply to type 1 FCCs. Type II FCCs are not approved for use with any normal IATA codes pallet or net, but the particular design it was tested. Based on requirement that Type II FCCs have simultaneous TSO C90d application, their approved pallet/net should be identified.	Change. For Type I FCCs: identify the pallets and nets the unit may be used with (IATA size codes). For Type II FCCs: Identify the pallet or net the unit is approved with (part number or model number).	Non-concur. ID of model/part number of a net would mean that a net supplier selling to multiple customers would have to have multiple marking schemes for nets to address the different parts they could be incorporated into or if the net is to be used as net by itself.

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Commenter	Section # & Page #	Comment	Suggested Change & Rationale	Disposition
J.Lee, ANE150	General Comment	It should be made clear that RTCA-160G is equivalent to EUROCAE ED-14G and may be alternatively used for all defined testing.  AS6453 indicates the equivalent specifications in Note 7 under section 4.6.	Add to appendix that: RTCA DO-160G is equivalent to EUROCAE ED-14G and may be alternatively used for all defined testing.  Based on how it's written as a Note under Section 4.6, that can mean that only the Environmental tests defined in AS6453, Section 4.6 allows for DO-160G and not any other section (i.e. flammability (-160G section 26) and fungus tests (-160G section 13) are not referenced under that section.	Non-concur. The FAA does not have representation following the development and maintenance of EUROCAE ED-14G and we do not recognize it as equivalent to RTCA DO-160G. The note in the appendix regarding this is correct. For clarity, the instructions in the Appendix will be revised to indicate Note 7 in Section 4.6 is to be disregarded.
ANE-170	Section 3. & Page 1	"in in SAE" to "in SAE"	Typo error	Adopted.
ACE-116C, Steve Rosenfeld, (847) 294-7030	Page 1, paragraph 3.e.	This paragraph should refer to sections 5 and 6 in SAE AS6453 as well as section 4.	Section 4 of the AS6453 refers to general requirements for the Fire Containment Cover (FCC) while Section 5 describes the required test performance and Section 6 the test procedures. This paragraph should read "Demonstrate the requirements, in SAE AS6453, Section 4, and the performance requirements in Section 5 when subjected to the specified tests in Section 6..."	Adopted. Change applied to paragraph 3.c.
ACE-116C, Steve Rosenfeld, (847) 294-7030	Page 2, paragraph 3.e.	This paragraph should be re-written to allow the use of the FAA Aircraft Materials Fire Test Handbook without requiring a deviation.	The FAA Aircraft Materials Fire Test Handbook is accepted as an alternate means of compliance to 14 CFR Part 25.853, 25.855 and Part 25 Appendix F. Based on	Adopted. Permission has been included has been in Appendix A.

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			<p>this, there should be no need for a further deviation to allow the use of this document. The following should be added to this paragraph: "It is permissible to utilize the procedures described in the FAA Aircraft Materials Fire Test Handbook, Document DOT/FAA/AR-00/12 to show compliance with the flammability requirements of this TSO without deviation approval.</p>	
ACE-116C, Steve Rosenfeld, (847) 294-7030	General	There should be some provisions for the use of TSO-C203 Fire Containment Covers (FCC's) in conjunction with cargo nets and pallets approved under TSO C90 series.	Some manufactures may want to produce TSO C90 nets and C203 FCC's together as a package (C203 Type II FCC and C90 net manufactured as one assembled unit, or C203 Type I FAA and C90 net shipped together as a kit). Because of this, there may be some relief to some of the TSO requirements or other unforeseen advantages that may be gained for the manufacturer from a TSO compliance point of view for both FCC's and Nets produced and shipped together (or even FCC's, nets and pallets produced as one unit). This should be the focus of further study by the FAA before C203 is published.	Concur but Outside of Scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC.
Scott Franke ASW-170	Appendix 4.4 (AS6453) Pg 6	Reasoning to remove weight and handling suggestions (should)?	Alter 4.4.1 to remove 1 <sup>st</sup> sentence only.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. Paragraph 4.4 addresses installation which is out of scope for the TSO.

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Scott Franke ASW-170	Appendix 4.5.3 Pg. 6	Smooth suggestion is reasonable. (Again a “should”). Why remove?	This is a “should” and improves design while nota requirement	Concur but outside of scope. The purpose of this TSO is to provide technical requirements for the FCC, there is no measurable criteria here to evaluate against for “smoothness”.
S. Miles ASW-111	3. Requirements Line 3	Extra word”in” included...requirements in SAE International AS6453	Remove extra “in”	Adopted.
Page 1, Section 3, paragraph a  S. Happenny, ANM-112, (425) 227-2147	The explanation for the functionality of the TSO should be clarified to clearly state that the TSO is intended for FCCs used to supplement Unit Load Devices (ULDs) and pallet & net assemblies.	I had thought that the TSO would include the usage of FCCs on Unit Load Devices (ULDs) as well as pallet & net assemblies. Also, the functionality statement does not match the Clearance Record (CR) file where FAA states, “This TSO specifies the design and performance criteria and testing methods applicable to fire containment covers intended to be used in conjunction with air cargo unit load devices.” The functionality statement and the CR should reflect the intended function of the TSO. Please clarify.	Recommend that the applicability of this TSO should be clarified. Either it pertains to cargo containers (i.e., ULDs) or not. If it does apply to ULDs then it should reflect this clearly in the TSO statement in paragraph a and in the CR as follows: This TSO’s standards apply to equipment intended to be used to cover unitized cargo containers (i.e., ULDs) and the carriage of cargo restrained in an air cargo pallet and net assembly, for loading into aircraft main deck cargo compartments to improve fire protection in aircraft cargo compartments.	Non-concur. Containers and net pallet assemblies both are defined as ULDs per AS6453 Section 3.5 and TSO-C90d Appendix 1. All statements are correct when the correct definition of ULD is considered. This TSO contains MPS for FCCs for pallet and net assembly ULDs only as stated in AS6453 Section 1.3.
Page 3.  S. Happenny, ANM-112, (425) 227-2147	p.2, ¶4.(c) 2 <sup>nd</sup> bullet	Should this be maximum protection durations.	This seems to be giving limits, and the ‘minimum’ duration would not be useful.	Non-concur. Protection time needs to be 6 hours (a minimum) or more to provide for an allowable flying time of 6 hours (maximum).
Page 5.  S. Happenny,	p.2, ¶4.(c) 3 <sup>rd</sup> bullet	Suggest different wording.	Current language is a little awkward.	Adopted. Wording of bullet clarified.

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ANM-112, (425) 227-2147				
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 1.1  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard these sections. Is this because the SAE AS6453 refers to portions of CS 25 addressing Class B, E and F cargo compartments and current FAA regulations do not include Class F cargo compartments? Or the reference to ISO 14186? The stated instructions in this paragraph seem to be appropriate.	The stated instructions in this paragraph seem to be appropriate.	I recommend that the TSO be changed to accept the guidance within section 1.1 of SAE AS6453.	Concur but out of scope. The guidance in Section 1.1 is valid, but, the purpose of a TSO is to provide MPS for design approval. Section 1.1 addresses installation, not MPS.
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 1.2  S. Happenny, ANM-112, (425)	The instructions within the TSO state to disregard these sections. Is this because the SAE AS6453 refers to portions of CS 25 addressing Class B, E and F cargo compartments and current FAA	Recommend the TSO state Disregard reference to CS regulations and to Class F cargo compartment.	In addition, the applicability of this TSO should be clarified. Either it pertains to cargo containers (i.e., ULDs) or not. If it does apply to ULDs then it should reflect this clearly in the TSO statement in paragraph a and in the CR as follows: This TSO's standards apply to equipment intended to be used to cover unitized cargo containers (i.e., ULDs) and the carriage of cargo restrained in an air cargo pallet and net assembly, for loading into aircraft main deck	Concur but out of scope. The information in Section 1.2 is valid, however it addresses installation and foreign regulations, not MPS.  Applicability of this TSO is correctly stated in section 3.a of the TSO.

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227-2147	regulations do not include Class F cargo compartments? A solution would be to disregard only those references to the CS regulations and Class F compartment. Also, per comment number 1 above, the applicability of the TSO may need to be changed to include clarification that FCCs may be used with ULDs.		cargo compartments to improve fire protection in aircraft cargo compartments.	
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 1.7  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard these sections. Is this because the section mentions ISO 9001:2008? However, the intent of the section seems valid. Perhaps FAA could accept the section with the caveat?	The intent of the section seems appropriate and valid. Recommend that the TSO should refer to this section and provide further explanation on the subparts which are not applicable to the TSO.	TSO should refer to this section and explain that, FAA has not reviewed ISO or any other documents, beyond what is already included in the TSO, for acceptable use. This prevents them from being included in the TSO. An applicant, whether US or international, may request permission to use another standard by applying for a deviation per 14 CFR Part 21 Subpart O. In lieu of ISO 9001, substitute, "FAA approved weights and loading manual"; or in lieu of ISO 9001:2008 substitute "the manufacturer must provide additional criteria that is found acceptable to the FAA."	Concur but out of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. The information is valid, but, Section 1.7 provides guidance for installation.

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<p>APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 3.2</p> <p>S. Happenny, ANM-112, (425) 227-2147</p>	<p>The instructions within the TSO state to disregard the second sentence which states, 3.2 FIRE CONTAINMENT COVER (FCC) Passive device used in conjunction with an air cargo pallet and net in order to contain a possible cargo fire beneath it for a rated period. Guidance addressing the use of FCCs is provided in airworthiness regulatory guidance as one of the allowable means of compliance with fire containment requirements in certain classes of aircraft cargo compartments. This guidance in SAE AS 6453 is valid. FAA-TAD rulemaking includes a discussion on the</p>	<p>I suggest that the guidance in the 2<sup>nd</sup> sentence be retained.</p> <p>This raises a larger issue in that if the reason several sentences/subsections or sections are to be “disregarded” because they pertain to Class F cargo compartments (which are currently in rulemaking for release) then should this TSO note that it includes provisions for future FAA standards involving Class F cargo compartments that are consistent with EASA standards?</p>	<p>Recommend that the TSO remove the instructions to disregard 2<sup>nd</sup> sentence in SAE AS 6453 section 3.2.</p>	<p>Concur but out of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. The second sentence of Section 3.2 addresses guidance. Note: The FAA has not released any guidance material on FCCs to date.</p>

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	use of FCCs & FRCs to meet compliance associated with Class F cargo compartments.			
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.1  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard these sections. Is this because the subsection refers back to 1.1 & 1.2? However, the intent of this subsection is valid and appropriate.	The intent of the section seems appropriate and provides valid information.	Per comment # 2 and #3 above, recommend that the TSO accept section 4.1 of the SAE AS6453 or provide further explanation on the subparts which are not applicable to the TSO.	Concur but out of scope. The information in section 4.1.1 is valid, however, the design approval requirements are identified in section 5 of TSO-C302 which supersedes the information in 4.1. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. Section 4.1.2 provides valid guidance, but no MPS and it discusses a TSO article other than an FCC.
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.2.1  S. Happenny,	The instructions within the TSO state to disregard Note 4 and Note 6. However, the intent of this subsection is valid and appropriate.	The intent of the section seems appropriate and provides valid information.	Recommend that the TSO accept these notes of section 4.2.1 of the SAE AS6453 or provide further explanation on the subparts within the notes which are not applicable to the TSO.	Concur but Out of Scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. Note 4 provides information and guidance on installation,. not MPS. Note 6 provides

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ANM-112, (425) 227-2147				information, but not MPS.
Appendix, Table  S. Happenny, ANM-112, (425) 227-2147	Re. section 4.3 .Except for 4.3.2, most of this section seems either redundant, or difficult to show that it's met.	Not mentioned.	Disregard 4.3, except for 4.3.2	Concur. The appendix has been revised as requested.
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.3.4  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard - 4.3.4. However, the intent of this subsection is valid and appropriate. Is this because of the reference to "human health" (i.e., "... Other materials shall be assessed prior to selection as to potential detrimental effects on human health.")? I agree that section 4 contains some guidance which is non-technical; but the guidance seems to conform to current industry	The intent of the section seems appropriate and provides valid information. Note that ANM-112 has communicated with AAM-1 and they concur with our comment to include it within the guidance.	Recommend that the TSO accept section 4.3.4 of the SAE AS6453.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. We agree the intent of Section 4.3.4 is valid and appropriate to the FCC, however, it does not however contain MPS.

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	practices which are acceptable.			
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.4  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard - 4.4. However, the intent of this subsection is valid and these seem to be based on industry standards.	The intent of the section seems appropriate and provides valid information.	Recommend that the TSO accept section 4.4 of the SAE AS6453 or provide further explanation on the subparts within this section which are not applicable to the TSO.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. We agree the intent of Section 4.4 is valid and appropriate to the FCC in general, however it addresses installation and does not contain MPS.
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.5.3  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard - 4.5.3. However, the intent of this subsection is valid and these seem to be based on industry standards and current practices.	The intent of the section seems appropriate and provides valid information.	Recommend that the TSO accept section 4.5.3 of the SAE AS6453 or provide further explanation on the subparts within this section which are not applicable to the TSO.	Concur but outside of scope. The purpose of this TSO is to provide technical requirements for the FCC, there is no measurable criteria here to evaluate against for "smoothness".
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT	The instructions within the TSO state to disregard - 4.5.4. Is this because the section mentions ISO 7166	The intent of the section seems appropriate and provides valid information.	Recommend that the TSO accept section 4.5.4 of the SAE AS6453 with a caveat that in lieu of ISO 7166 the manufacturer must provide additional criteria that is found acceptable to the FAA.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for

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COVERS, Section 4.5.4  S. Happenny, ANM-112, (425) 227-2147	geometric requirements? However, the intent of the section seems valid. Perhaps FAA could accept the section with the caveat? Could FAA substitute (a) another accepted industry practice in lieu of the ISO reference; or (b) provide additional performance conditions for the fittings?			an FCC. We agree the intent of Section 4.5.4 is valid and appropriate to the FCC in general, however it addresses installation and does not contain MPS.
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.5.6  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard - 4.5.6. While I agree that the extent of the information in 4.5.6 includes the connection between the FCC and the net, it seems to be based on industry standard practices. From a practical standpoint if you are going to use a FCC with a pallet	The intent of the section seems appropriate and provides valid information.	Recommend that the TSO accept section 4.5.6 of the SAE AS6453 and either provide additional guidance or provide further explanation on which statement / subpart is not applicable to the TSO and may be disregarded.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. We agree the information in Section 4.5.6 contains valid information, however it addresses requirements for the net, not the FCC.

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	& net, there must be some connector and FAA needs to address the subject. Could FAA provide additional performance conditions?			
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.5.7 & 4.5.8  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard - 4.5.7 & 4.5.8. While I concur that sections 4.5.7 & 4.5.8 contain guidance which is non-technical; the guidance seems to conform to current industry practices which are acceptable.	The intent of these sections seems appropriate and provides valid information.	Recommend that the TSO accept section 4.5.7 & 4.5.8 or provide further explanation why these sections are to be disregarded	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. The information in Sections 4.5.7 and 4.5.8 address installation (not MPS).
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 4.7  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard - 4.7. While I concur that this section contains guidance on maintenance and not performance specifications; the guidance seems to conform to current industry practices which are	The intent of these sections seems appropriate and provides valid information.	Recommend that the TSO accept section 4.7 and add that approval for installation on the airplane may require additional information.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an information in Section 4.7 is valid, however it covers maintenance and installation requirements.

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	acceptable. Furthermore, if FAA approves the use of FCCs to meet compliance to certain regulations then as part of an approved system FAA would require Instructions for Continued Airworthiness (ICA) which include maintenance instructions.			
Appendix, Table  S. Happenny, ANM-112, (425) 227-2147	Re. 5.1.1-- suggest requiring test of seam here, to avoid complication of positioning in 6.2.2	Setting up the test to address this issue in 6.2.2 is difficult and might not actually achieve the goal	Include a requirement to test seams, centered over the burner in addition to the basic material test.	<b>Adopted.</b>
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 5.1.2 & 5.1.3  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard – 5.1.2 & 5.1.3. While I concur that these sub-sections contain guidance on performance specifications for pallet and net, which are beyond the specific topic of this TSO; the	The intent of these sections seems appropriate and provides valid information.	Recommend that the TSO accept section 5.1.2 & 5.1.3 in total; or retain instruction to disregard with the caveat that approval for installation on the airplane will require additional specifications for the pallet and net.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. These requirements apply to the net and pallet, which are addressed in TSO-C90.

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	guidance seems to conform to current industry practices which are acceptable. Also, from a practical standpoint, if an FCC is approved for use there must be some requirements for the pallet and net/connector and these sub-sections provide reasonable standards.			
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Section 5.3.1  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard the second sentence of 5.3.1. While I concur that this section contains guidance on maintenance and not performance specifications; the guidance seems to conform to current industry practices which are acceptable. Furthermore, if FAA approves the	The intent of these sections seems appropriate and provides valid information.	Recommend that the TSO accept section 5.3.1 in total or retain the statement to disregard the 2 <sup>nd</sup> sentence but add that approval for installation on the airplane will require additional information (e.g., ICA).	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. The information in section 5.3.1 second sentence addresses maintenance requirements, not design and production of the FCC.

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	use of FCCs to meet compliance to certain regulations then as part of an approved system FAA would require Instructions for Continued Airworthiness (ICA) which include maintenance instructions for allowable damage and repair/replacement.			
Appendix, Table S. Happenny, ANM-112, (425) 227-2147	Re. 5.3.2—Suggest a different change to the wording.	Editorial	Reword as follows: “The maximum allowable damage shall be no less than...”	Non-Concur. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. The purpose of the TSO is not to make editorial changes to an industry standard.
Appendix, Table S. Happenny, ANM-112, (425) 227-2147	Re. 5.3.2 Note 10- Other than being informational, it’s not clear what value note 10 is; the requirement referred to applies to the fire	The information in note 10 doesn’t add to the TSO, and it’s not clear what an applicant would do with it.	Disregard note 10.	Adopted.

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<b>Originating Office:</b> AIR-130	<b>Document Description:</b> TSO-C203 Fire Containment Cover (FCC)	<b>Project Lead/Reviewer</b> Joan Hughson	<b>Reviewing Office:</b>	<b>Date of Review:</b> 3/6/2014
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Commenter	Section # & Page #	Comment	Suggested Change & Rationale	Disposition
	suppression system, not the liners; even if it did, the relevance to the FAA is not clear.			
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Sections 6.1.1.6 and 6.1.1.7  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard the sections 6.1.1.6 & 6.1.1.7. While I concur that these sub-sections contain guidance on performance specifications for pallet and net, which are beyond the specific topic of this TSO; the guidance seems to conform to current industry practices which are acceptable. Also, from a practical standpoint, if an FCC is approved for use there must be some requirements for the pallet and net/connector and these sub-sections provide reasonable	The intent of these sections seems appropriate and provides valid information.	Recommend that the TSO accept section 6.1.1.6 & 6.1.1.7 in total; or retain instruction to disregard with the caveat that approval for installation on the airplane will require additional specifications for the pallet and net.	Concur but outside of scope. We agree the information in Sections 6.1.1.6 and 6.1.1.7 contain valid information, however the information is not applicable to the FCC. The pallet and net requirements will be addresses in a future revision to C90.

### Division Comment Metric

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	standards.			
APPENDIX. MINIMUM PERFORMANCE STANDARD (MPS) FOR FIRE CONTAINMENT COVERS, Sections 6.1.6  S. Happenny, ANM-112, (425) 227-2147	The instructions within the TSO state to disregard the section 6.1.6. However, this sub-section provides guidance on materials testing for various operational conditions (i.e., following puncture, U.V. & humidity, Abrasion test and Fungus test) and ensures the manufacturer consider these effects when performing the flammability & flame penetration testing.	The intent of these sections seems appropriate and provides valid information.	Recommend that the TSO accept section 6.1.6 in total.	Concur but outside of scope. The purpose of this TSO is only to provide the requirements for design and production approval (a TSOA) for an FCC. We agree the information in Section 6.1.6 is valid as guidance material. It does not contain MPS, however , and will not be included in the TSO.
Appendix, Table  S. Happenny, ANM-112, (425) 227-2147	Re. Section 6.2.2, third bullet rewording.	Editorial	Reword as follows: "... (worst case) and positioned to impinge on a stitching..."	Concur but out of scope. This is an acceptable suggestion, however it is not the purpose of a TSO to make editorial changes to an industry document.
Appendix, Table  S. Happenny, ANM-112, (425)	Re. 6.2.6-- It's not clear whether the repair is for maximum damage,	Wording in AS is not clear.	Establish a TSO requirement to test the maximum damage not requiring repair.	Non-concur. 6.2.6 does prescribe that the FCC be tested presenting maximum damage

### Division Comment Metric

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227-2147	or some other amount of damage; is the damage the most that doesn't require repair?			"intended to be allowed in service". The follow on requirements do however address continued operational safety which is out of scope for the TSO and they will be disregarded.
Appendix, Table S. Happenny, ANM-112, (425) 227-2147	Re. Annex D-- Annex D is presumably guidance. However, since we don't mention it or § 5.2.4, what is required?	Requirement of TSO not clear, and may not be useful anyway.	Disregard 5.2.4.	Adopted.