

## Public Review Comment Metric

<b>Originating Office:</b> AIR-130	<b>Document Description:</b> TSO-C204a	<b>Project Lead/Reviewer</b> Kevin Bridges	<b>Reviewing Office:</b>	<b>Date of Review:</b>
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	Commenter	Section # and Page #	Comment	Suggested Change and Rationale	Disposition
1.	Airbus	§3.a page 2	<p><i>“PRN range of 120 thru 156”</i> ⇒ The last authorized PRN is 158.</p>	Suggested to change to “PRN range of 120 thru 158” as stated in DO-229E Appendix A §A.3.4	<b>Accepted.</b>
2.	Airbus	§3.h page 4	Reference to AC20-115 (latest revision) is more stringent than what is stated in DO-229E that refers to AC20-115C or a later revision.	Suggested to change to “AC 20-115C (or later revision)”	<b>Accepted.</b>
3.	Airbus	Appendix 1 page 1-2	<p><i>“ it is recommended that manufacturers reference their equipment aircraft information security review and mitigation strategies in the equipment’s installation manual so that the applicant can consider them in meeting the installation regulatory requirements.”</i> ⇒ TSO should not ask to refer the mitigation strategies in a document that can be easily accessible</p>	<p>Suggested to change as follow: <i>“ ... it is recommended that manufacturers <b>inform applicants</b> about their equipment aircraft information security review and mitigation strategies so that the applicants can consider them, <b>if necessary</b>, in meeting the installation regulatory requirements.”</i></p>	<b>Accepted.</b>
4.	CMC	Section 3.a Page 2	SBAS PRN range is wrong.	SBAS PRN range is 120 thru 158 instead of 120 thru 156.	<b>Accepted.</b>
5.	CMC	Section 3.f Page 3	Reference to paragraph 3.b is wrong.	Replace 3.b with 3.c.	<b>Accepted.</b>

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6.	CMC	Section 3.g Page 3	Reference to paragraph 3.b is wrong.	Replace 3.b with 3.c.	<b>Accepted.</b>
7.	CMC	Section 4.a Page 5	Missing “.” at the end of the sentence. Unclear if just “.” missing or if second sentence of TSO-C145d accidentally deleted.	Add “.”. May also need to add “The marking must include the serial number.”.	<b>Accepted.</b> Included the period at the end of the sentence. The template in Order 8150.1D no longer contains the sentence about marking with the serial number because the statement conflicts with 14 CFR 45.15(b).
8.	CMC	Section 5.m Page 7	Reference to paragraph 3.c is wrong.	Replace 3.c with 3.d.	<b>Accepted.</b>
9.	CMC	Section 6.f Page 7	Reference to paragraph 3.d is wrong.	Replace 3.e with 3.f.	<b>Accepted.</b>
10.	CMC	Section 3 and appendix	In RTCA/DO-229E environmental test requirement tables, the X for Acquisition versus Reacquisition is supposed to be based on Abnormal versus Normal power input not DC versus AC power input.	TSO should put an amendment to correct this issue:  Initial Acquisition Time requirement should apply to both AC and DC equipment under abnormal operating condition (DO-160E section 16.5.2 and 16.6.2) and Satellite Reacquisition Time requirement should apply to	<b>Accepted.</b>

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				both AC and DC equipment under normal operating condition (DO-160E section 16.5.1 and 16.6.1).	
11.	Embraer	Section 1.8.3 and page 2-1.	Include a reference to DO326A/ED-202A about system information security.	DO-326A/ED-202A provides guidance to assess vulnerabilities and identification of required mitigation.	<b>Accepted.</b>
12.	Garmin	3.c.(4) Page 2	<p>Paragraph. 3.c.(4) includes the statement:</p> <p style="padding-left: 40px;">Design the system to at least these failure condition classifications.</p> <p>Wording needs to change to allow failure condition to be determined at the aircraft level.</p> <p>This statement implies the failure condition classification of an appliance is determined by the TSO regardless of mitigations employed to meet aircraft level safety requirements such as redundant appliances/systems. Unless the DAL cannot be affected by the installation, the aircraft System Safety Assessment should determine the failure classification and by extension, the</p>	Suggest changing to the alternate wording identified in paragraph 3.b. of the TSO Template in Order 8150.1D Appendix G.	<b>Not Accepted.</b> The TSO provides a design approval for the equipment based upon the intended function. For TSO-C204a, the intended function has an identified failure condition classification. The DAL a manufacturer chooses to meet that failure condition is based upon the target aircraft installation (i.e., 14 CFR Part 23, 25, 27, 29). Manufacturers can request a deviation to use a different DAL for a particular target aircraft if there is an equivalent level of safety provided thru a limitation on

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			<p>design assurance level (DAL) requirement. The aircraft FHA/SSA ultimately determines the DAL requirement for a particular installation. Specifying the DAL at the appliance level without the benefit of the specific aircraft level FHA/SSA means that in some cases the DAL will undoubtedly be higher and more costly than necessary. This will have a chilling effect on the installation of new, safety enhancing technologies since the cost will be greater than necessary. It is possible to build and certify a TSOA appliance that cannot be approved for installation in one or more aircraft types because it does not have the required DAL. Similarly, just because the appliance meets a TSO DAL does not mean it can be approved for installation. We recommend that no failure classification/DAL requirement be included in a TSO when the installation can affect or mitigate the hazard level and therefore consideration should be given to revising paragraph 3.c in this TSO to the general guidance in the Recommendation column.</p>		<p>installation guidance to mitigate the issue.</p>

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13.	Garmin	3.g Page 3	<p>Including this specific DO-254 reference is redundant to the rest of the paragraph in this section.</p> <p style="padding-left: 40px;">For custom airborne electronic hardware determined to be simple, RTCA/DO-254, paragraph 1.6 applies.</p> <p>DO-254 makes it clear how to address “simple” custom airborne electronic hardware.</p>	Remove this reference to DO-254 Paragraph 1.6.	<p><b>Not Accepted.</b> This is specific language required by the Order 8150.1D template and is not actually redundant. If the sentence is omitted, only complex custom AEH would be referenced (see the sentence just prior to that). If reference was to AC 20-152 instead of DO-254, both simple and complex would be addressed. Although Order 8150.1D does reference AC 20-152, it only does so wrt deviations and data submittal.</p> <p>The intent for the reference is ensuring TSO applicants understand their responsibilities per DO-254 even with “simple” hardware.</p> <p>However, this comment will be forwarded to the POC to consider changes in future revisions.</p>

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14.	Garmin	4.b.(2) Page 3	<p>Paragraph 4.b.(2) states:</p> <p style="padding-left: 40px;">Each subassembly of the article that you determined may be interchangeable. This language is confusing.</p>	<p>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 updating to wording identified in paragraph 4. of the TSO Template in Order 8150.1D Appendix G.</p>	<p><b>Not Accepted.</b> TSO-C145e follows the current TSO template language. However, this recommendation will be forwarded to the POC for consideration in the next update.</p>
15.	Garmin	5.i Page 6	<p>Paragraph. 5.i includes the statement:</p> <p style="padding-left: 40px;">Identify functionality or performance contained in the article not evaluated under paragraph 3 of this TSO (that is, non-TSO functions).</p> <p>The GAMA 16-28 “Industry Recommendations on the Management of Non-Technical Standard Order Functions” Recommendation 2 recommended revising the Appendix G TSO template to remove “or performance” from the quoted paragraph 5.i statement to ensure non-TSO function definitions are “fully aligned with the</p>	<ol style="list-style-type: none"> <li>1) Remove “or performance” in accordance with the GAMA non-TSO function recommendations.</li> <li>2) Update Order 8150.1D Appendix G paragraph 5.f in accordance with the GAMA recommendations.</li> <li>3) Work with GAMA to address all the non-TSO function recommendations.</li> </ol>	<p><b>Partially Accepted.</b> TSO-C204a follows the current TSO template language. However, this recommendation will be forwarded to the POC for consideration in the next update.</p>

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			original intended N8150.3 definition”. This recommendation was not followed when FAA Order 8150.1D was published.		
16.	Garmin	5.i.(7) Page 6	<p>Paragraph 5.i.(7) includes the statement:</p> <p style="padding-left: 40px;">Alternatively, identify non-TSO functionality or performance contained in the article not evaluated under paragraph 3 and submit previously accepted data for the non-TSO function for acceptance in parallel with this TSO application.</p> <p>This paragraph is not included in the FAA Order 8150.1D Appendix G TSO template. It is unclear whether this statement is intended to respond to one or more of the GAMA 16-28 “Industry Recommendations on the Management of Non-Technical Standard Order Functions”. Regardless, the statement has the same issue as identified with paragraph 5.i regarding use of the phrase “or performance”.</p>	Remove “or performance” in accordance with the GAMA non-TSO function recommendations.	<b>Partially Accepted.</b> This recommendation will be forwarded to the POC for consideration in the next update.
17.	Garmin	Appendix 2, page 2-1	The draft TSO text says to add the note after the last paragraph in paragraph 2.3. However, section 2.3 of DO-229E does	Remove the reference to paragraph 2.3 from the TSO text so that it reads:	<b>Accepted.</b>

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			not apply to class Beta equipment. This appears to be a copy-and-paste error from draft TSO-C205a.	<p>“Add the following note after the paragraph.”</p> <p>This is consistent with the language in draft TSO-C146e.</p>	
18.	THALES Avionics	Appendix 1	To address information security, the document should refer to the RTCA/EUROCAE documents on information security such as (DO-326A / ED-202A, DO-355 / ED-204, upcoming DO-356A / ED-203A). While the document, of course, may reference some active security measures as recommendations, the document should clearly promote the use of Standards.	<p>These references should be listed in the (last) paragraph 1.8.3 of Appendix 1: Instead of “Therefore, it is recommended ... meeting the installation regulatory requirements.” Replace by “Therefore, it is recommended that manufacturers document their Security Assurance Level objectives to protect the main functions of equipment with a low direct impact and avoid propagating an attack to other equipment. In this purpose, supplemental guidance material may be found in RTCA/EUROCAE such as DO-326A / ED-202A, DO-</p>	<p><b>Partially Accepted.</b> Draft documents cannot be referenced in the TSO, so references to DO-356A/ED-203A cannot be included. References to DO-326A/ED-202A and DO-355/ED-204 are now included at the end of the second paragraph.</p> <p>But, section 1.8.3 is only informational in nature and not a requirement. Manufacturers may use any reference material they choose to address cybersecurity issues.</p>

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				355 / ED-204, DO-356A / ED-203A.	
19.	THALES Avionics	Appendix 1	It is proposed to explicitly mention that security defenses and measures should be ensured by the aircraft operator all along the lifetime of the equipment use.	Adding the following sentence : “Appropriate procedures for aircraft operators should be established by Aircraft manufacturer to ensure that the approved security protection of the equipment is maintained all along the lifetime of the equipment installation in the aircraft”.	<b>Partially Accepted.</b> The following sentence was added to the last paragraph as the next to last sentence:  <i>“Additionally, aircraft manufacturers should consider establishing appropriate procedures for aircraft operators to maintain security protection of the equipment during the life of the equipment installation in the aircraft.”</i>
20.	THALES Avionics	Appendix 1	It is understood that equipment manufacturers should provide security information in the Installation Manual so that the aircraft manufacturer can consider them in their vulnerability risk assessment. Nevertheless, too much documenting the mitigation strategies may impair safety, by highlighting equipment vulnerabilities.		<b>Noted.</b> Section 1.8.3 is informational only and there are no instructions to document anything in the Installation Manual.