

Field Document Comment Log

AC 20-EFB

#	Commenter	Page & Para. No.	Comment	Reason for Comment	Suggested Change	Comment Resolution
1.	P. Skaves	Page 1, subject	Subject: Installation of Electronic Flight Bag Components	Consistent with AC 120-76A. Readers may assume that components are a subset of EFB devices.	Change components to devices	Accepted. Added to 2 nd sentence of paragraph 1.a to state: “In it, we, the Federal Aviation Administration (FAA), describe how to design EFB components and aircraft connectivity provisions for EFB device and component installations by addressing the principal elements, or “components,” which comprise a typical EFB device or system.”
2.	P. Skaves	Page 2	Portable or installed EFB systems nomenclature has superseded EFB Class 1, 2 and 3 classifications. This change is OK however an explanatory paragraph should be added as other guidance material still refers to EFB Class 1, 2 and 3 EFB systems and could confuse the reader.	Consistency with other published EFB guidance.	Provide an explanatory paragraph on how portable and installed systems map to other FAA guidance material.	Accepted. Added new 4 th sentence to paragraph 4.a to read: “AC 120-76 defines Class 3 EFBs as “installed EFBs.” Also added new 6 th sentence to paragraph 4.a to read: “AC 120-76 recognizes there may be other, non-EFB applications, and refers to them as Type C applications.”
3.	P. Skaves	Page 3	Guidance for individually installed EFB components. Coordinate guidance and publish criteria for securing IPADS for take-off and landing.	We are fielding a lot of comments. Is Velcro OK, etc.?	Specifically address securing of IPADS in the flight deck.	Accepted. Added new paragraph 8 to state: “(8)Use of Velcro. Use of Velcro. We do not recommend use of Velcro type hook and loop fastener material for mounting or securing the EFB to a mount, or the aircraft, because the

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						<p>closure strength of Velcro degrades with each use. The cycle life, which is the number of times the hooks and loops can be engaged and disengaged before the closure strength is reduced to 50% of original values, cannot be accurately tracked without a maintenance action. If using Velcro for installed EFB mounts:</p> <p>(a) The ICAs must identify inspection intervals, inspection process, and replacement intervals.</p> <p>(b) The AFM or AFM/S must address the procedure for fastening the Velcro to restrain a portable EFB.</p> <p>(c) Ensure the installed Velcro is able to perform its intended function (e.g., retain a portable EFB of specific size and weight) when the Velcro has reached its maximum inspection interval.”</p>
4.	P. Skaves	Page 5 Para 5.c.(2).(c)	There is no regulatory basis other than non-interference to incorporate security considerations for EFBs in policy at this time.	Consistency with other published guidance and current special conditions guidance.	Delete paragraph (c).	<p>Accepted. Deleted paragraph (c) and added sentence from that paragraph to paragraph (b) to cover design concerns under the non-interference requirements.</p>

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5.	Kuen (ACE-117C)	General	What is the definition of “must, “should”, “may” and “can”, “recommended” used throughout the text of the AC.	Normally “must” is required and is based on a rule. “Should” defines a method of showing compliance to the rule and alternates can be provided via an issue paper. “May” and “can” recommended are not required or are considered optional.	Provide reference to appropriate definitions. The appropriate use these words should be reviewed throughout the document.	Not Accepted. The use of the terms must, should, etc. is consistent with AC guidance. Paragraph 1.b. states “if you use the means described in this AC, you must follow it entirely.” In this context the AC can use must, but is not regulatory.
6.	J. Brady ACE-111	general	Overall I do not see the need for the proliferation of ACs. Two ACs already exist that cover this topic. Instead of adding a third AC that needs to be maintained add any additional needed information to AC 120-76. Each additional AC adds the potential for conflicting guidance. Cancel this AC and update AC 120-76.			Not Accepted. The plan is to point at this material in future versions of AC 120-76 to give aircraft certification more control on future changes. The reality is that future changes to AC 120-76 after this next “B” version are unlikely. This AC will be able to incorporate the numerous policy memos that have resulted and make future changes easier.
7.	R. Hirt	Page 1	The last sentence ended	Not a complete	Remove “EFBs	Accepted.

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	ACE-114	Para. 1.a	with a couple of extra words left on the page. "Portable EFBs can be classified as Class 1 and Class 2. EFBs host".	sentence.	host"	This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence. A correct version was circulated, but apparently didn't catch up with the commenter.
8.	Jaconetti (ACE-117C)	Page 1, Para 1.b.	Sentences 2 & 3 appear to be out of order	Ease of reading	Swap sentences 2 & 3	Accepted.
9.	Jaconetti (ACE-117C)	Page 1, Para 3	What is the overlap & proposed interaction between this AC and AC 120-76A? AC 120-76A currently "provides an acceptable method of compliance for the certification, airworthiness, and operational approval of both portable and installed EFB..." whereas this AC "provides guidance on the design approval for installation of EFB components and aircraft connectivity provisions."	Potential confusion, overlap and disconnect between what is included in each AC	Clearly state which items each AC is focusing on when it comes to EFB installation. Or remove certification guidance from AC 120-76A and have this AC be for cert & the other for operational approval	Accepted. The plan is to pull this material out of AC 120-76 to give aircraft certification more control on future changes. The reality is that future changes to AC 120-76 after this next "B" version are unlikely. This AC will be able to incorporate the numerous policy memos that have resulted and make future changes easier.
10.	Jaconetti (ACE-117C)	Page 1, Para 4	3 rd sentence: "paper" may not be clear enough to those reading the AC	Add clarity	Change "paper" references to references that were	Accepted. Changed "paper" to "paper-based" for same effect.

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					traditionally supplied on paper	
11.	Jaconetti (ACE-117C)	Page 1, Para 4	Definitions or reference to the definitions of Class 1, 2 & 3 as well as Type A, B & C applications as they pertain to EFBs are not present	Add clarity	Add definitions or point to other sources as to where to find them	Previously Accepted. Previous comment added references to AC 120-76 here.
12.	Jaconetti (ACE-117C)	Page 1, Para 4	Last sentence: missing comma to set off the list	Grammar	Add a comma between “design” & “are”	Accepted.
13.	Jaconetti (ACE-117C)	Page 1, Para 4.a.	Last sentence of the page says “EFBs host.....” then is not continued on the next page.	Fix an error	Complete the thought & sentence	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
14.	Atlanta ACO – Mitch Huffman	Page 1, 4a	Paragraph ends with sentence -EFB’s host	Incomplete sentence	Describe the types of applications the EFB’s host.	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
15.	Roell, ACE-117W	Page 1, Para 4.a.	This paragraph is incomplete.	This paragraph is incomplete.	Complete the paragraph.	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
16.	Jaconetti (ACE-117C)	Page 2, Para 4.b.	Title & content of paragraph is similar to that of Para 4.a.	Reduce duplication	Add more information that offsets	Accepted.

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					paragraph a from b	
17.	Kuen (ACE-117C)	Page 2 Para 4.d	This paragraph discusses portable versus installed equipment. What is the definition of a portable component? Are there certain specific characteristics of portable components? Examples: Are they on the flight deck? Within the pilots reach? Can the pilot leave his seat to remove? Can special tools be used to remove the component? Can the portable component be installed in the EE bay, Radio Rack? Does the portable component need to perform any functions independent of the aircraft systems?	Applicants have twisted the understood definition portable components to their advantage. A clear definition will help to ensure consistent application of the AC.	Add definition of portable component to Section 5.	Not Accepted. This AC has no unique definition for a PED, which is defined elsewhere. Portable is that which is not installed.
18.	Jaconetti (ACE-117C)	Page 3, Para 5	One area that we are continually addressing and writing issue papers for with EFBs is that of the intended function. Even though the installation or provisions	It would be beneficial to applicants to know that they need to provide these kinds of data when	Add information that explains how intended function of the EFB system is critical to the	Acknowledged. Para 3 "Scope" changed to read: "This AC addresses installation of EFBs, EFB components, and provisions for EFB connectivity. Portable EFBs and EFB components are outside the scope of this AC.

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			we are approving may not have operational software, it is still critical that applicants describe the intended function of the EFB so that the certification requirements can be fully defined.	applying for STC.	certification process even when the installation is for provisions only or doesn't include operational software.	
19.	Kuen (ACE-117C)	Page 3, Para 5	The section should require a definition of weight/center of gravity that was used to as part of the design approval			Partially Accepted. Note added to end of Para 5.b should provided expected performance parameters for intended EFB. Portable EFB will have no design approval, so this information is not typically available.
20.	Jaconetti (ACE-117C)	Page 3, Para 5.a.	Subparagraphs (1), (2), (4), (5) could carry more weight if they contain regulatory references from 14 CFR XX (similar to subparagraph (3)).	Consistency across document	Correlate the design practices to the appropriate regulations, if applicable	Accepted. Applicable CFR references in this section added when needed.
21.	L. Lyne ACE-114	Pg 3 Par 5a	Sentence is difficult to understand: "Design EFB display mounting devices addressing applicable airworthiness regulations."	Grammar	Rewrite the sentence: "The design of the EFB display mounting devices must address	Accepted.

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					applicable airworthiness regulations.”	
22.	Jaconetti (ACE-117C)	Page 3, Para 5.a.(6)	The paragraph alerts applicants & operators to be aware of unsafe conditions when attaching a portable EFB to a yoke, but does not define the potential conditions outside of giving an example for weight.	Making the statement more comprehensive can help applicants to avoid unsafe conditions	Add more definition to “...unsafe conditions potentially created...” to include mass, moment of inertia and physical footprint (size).	Accepted. Added new last sentence to read” The mass, moment of inertia, as well as the physical size of the combined mount and EFB, can all contribute to potential unsafe conditions which require engineering analysis and possible testing.”
23.	Jaconetti (ACE-117C)	Page 3, Para 5.a.(7)	It is unclear if the statements in this paragraph refer to EFB installations, provisions or both. The wording that “yoke mounting the EFB must be incorporated into the aircraft type design” doesn’t clarify between the differences in class 1, 2 & 3 EFBs	Additional clarifications and guidance would be beneficial to all stakeholders	Clarify that provisions for an EFB that is yoke mounted need to be incorporated into the aircraft type design (unless it’s a class 3 EFB system)	Accepted. Changed sentence to read “All yoke mounting provisions (i.e., mounts, brackets, clips, etc.) for the EFB must be incorporated into the aircraft type design.”
24.	Kuen (ACE-117C)	Page 4, Para 5.c.(2)	The transmit-receive access for portable EFBs should be limited to systems that minor aircraft functions only.	There is not anyway to ensure the data being transmitted from a Class 1 or 2	Limit to aircraft funtions that will have a minor effect.	Acknowledged. Portable EFBs have no design assurance, so we must require that non-interference be proven regardless.

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			The information transmitted should only “no effect” at the aircraft level.	EFB with Type A or B applications will have appropriate integrity.		
25.	G. Berg ACE-114	Page 5 Para 5d.	Color displays. Many EFB manufactures have multicolor displays and color shades.	EFB VFR and IFR maps are displayed in shades of color. EFB also display color radar for storm severity. Some color shades may fade in EFB display as more sunlight touches EFB display.	Require the EFB display to be readable in sunlight and auto dim for night flying. Color coding or crosshatching symbology maybe needed for color blind pilots. For night time flying, the display may have to turn red so the pilot does not lose night vision. Otherwise, pilot could use their EFB for a cockpit flashlight.	Acknowledged. Design considerations for portable devices are out of scope, but are explained in AC 120-76. For installed displays, design will be driven by AC 25-11 or 23.1311 as appropriate, as well as AC 20-CNTL.
26.	G. Berg	Page 5	EFB with multiple	You have two	If we suggest	Not Accepted.

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	ACE-114	Para 5e	operating systems and multiple processors via hard partitioning with physical separation between operating systems.	separate systems feeding into a common installed display. If the common display fails, the pilot loses all navigational maps and approach plates	<p>multiple operating systems and multiple processors, then multiple displays should also be suggested.</p> <p>1. Have a primary display on the front side of the EFB and a backup display on the back side of the EFB.</p> <p>2. Use a USB cable between the EFB and aircraft MFD. Display EFB navigational maps and approach plates onto MFD.</p>	This section is dealing with processors and partitioning. Also, display configurations and combinations are unknown, so we give design guidance and leave it at that.
27.	Kuen (ACE-117C)	Page 6, Para 5.e.(1)	What is the definition of “miscellaneous, nonrequired equipment?”	This definition is normally associated with	Remove the term “miscellaneous,	Not Accepted. This terminology has long been used in AC 25-10. Often “NORSEE” or

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			Can the display be considered COTS?	“cabin system” discussed in AC 20-168 and does not seem appropriate for for an installed display providing information to the pilot.	nonrequired.” Replace with wording consistant with a minor effect.	Nonrequired Safety Equipment, it is usually Miscellaneous equipment not required by XX.1307. Regardless of whether a display is COTS, it can be installed as miscellaneous, nonrequired equipment.
28.	Kuen (ACE-117C)	Page 6, Para 5.e	The phrase “typically not compliant with RTCA/DO-178B” should be removed.	Aircraft certification is not approving the Type A or B applications, therefore compliance with DO-178B is not required.	Reword sentence.	Accepted. Type A/B software applications have no design, installation, or production approval requirements, but they can be approved software. They don’t have to be approved, but we are allowing for their approval, if desired. Changed to: “The host environment OS and Type A/B applications are not installed, and may be loaded by the manufacturer or operator.”
29.	Jaconetti (ACE-117C)	Page 6, Para 5.g.	Last sentence on page 6 into page 7 “applicant’s should contact the ACO for guidance...” implies only one ACO	Doesn’t recognize that applicant’s should contact their local ACO	Change “the” to “their local” or similar wording to convey the ACO that is in their geographical region	Accepted.
30.	Jaconetti (ACE-117C)	Page 6, Para 5.g.	Last sentence on page 6 into page 7 “applicant’s	Run-on sentence	Break the sentence into 2	Acknowledged. Sentence may be slightly

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			should contact the ACO for guidance...” is cumbersome to read		or more parts for ease of reading	cumbersome, but is not a run on. Caveats are necessary.
31.	Kuen ACE-117C	Page 6, Para 5.g	There should be a reference RTCA/DO-311 for installed lithium batteries.	This would eliminate the need for an issue paper to provide a method of compliance for installed lithium batteries with EFBs.	Add reference.	Not Accepted. At this time there is no established policy on small and medium rechargeable lithium batteries.
32.	Atlanta ACO – Mitch Huffman	Page 6, 5g	Requirements for Lithium Batteries should be identified since the applicant does not have to address the PED in class I and II certifications and it becomes the operator’s responsibility to ensure continuing airworthiness.	Batteries need to be addressed and the appropriate guidance identified.	Rather than referring to the ACO for guidance, include guidance materials for batteries (like DO-311).	Not Accepted. At this time there is no established policy on small and medium rechargeable lithium batteries. Until SC-225 products are available, this is necessary.
33.	E. Dvorak ACE-111	Page 6 & 7, Para. 5g	It is stated: Applicant’s should contact the ACO for guidance on appropriate design, testing, and maintenance standards for their rechargeable lithium batteries when designing installed EFBs	The AC should provide more specific guidance and not dump it on the ACO.	This AC should provide more specific guidance by referencing existing document such as TSOs C142a, C179, and/or	Not Accepted. At this time there is no established policy on small and medium rechargeable lithium batteries. Until SC-225 products are available, this is necessary.

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			employing rechargeable lithium batteries installed as part of aircraft type design.		other FAA documents that have been issued.	
34.	Kuen ACE-117C	Page 7, Para 6.c.(1)	Some functions that are performed by Type B applications are much higher than minor.	Misleading Performance calculations could have hazardous or catastrophic effects. Aircraft certification does not approve these applications and a safety assessment is not performed.	Remove the discussion of the safety effect of Type A and Type B applications.	Accepted. Changed to read: “(1) The use of Type A and B applications in portable devices has been found to provide an acceptable level of safety when accomplished in accordance with AC 91-78 or AC 120-76, as applicable.”
35.	E. Dvorak ACE-111	Page 7, Para. 6c(2).	It is stated: We recommend the use of ARP 4754A, Guidelines for Development of Civil Aircraft and Systems, and ARP 4761, Guidelines and Methods for Conducting the Safety Assessment Process on Civil Airborne Systems and Equipment, when developing your installed EFB system and showing compliance with airworthiness regulations.	For safety assessment guidance, this AC should reference AC 23.1309-1, AC 25.1309-1, etc.	These ACs take precedence over these ARPs. In fact, there are differences between AC 23.1309-1D and these ARPs. The Airborne Safety Advisory Team is issuing an AC 20 –XX on these ARPs and it will state the specific	Accepted. Added new final sentence to read: “For primary safety assessment guidance please refer to the system design documents for each aircraft type: (a) AC 23.1309-1, System Safety Analysis and Assessment for Part 23 Airplanes. (b) AC 25.1309-1, System Design and Analysis. (c) AC 27-1, Certification of Normal Category Rotorcraft. (d) AC 29-2, Certification of Transport Category Rotorcraft.”

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					ACs take precedence over the ARPs.	
36.	G. Berg ACE-114	Page 7 Add 6d.	EFB Evaluation.	User should do a EFB self evaluation to see if the EFB meets their needs and expectations.	Suggest that EFB user use Order 8900.1 Chg 47 using Figure 4-79 Checklist 1 – Tabletop EFB Evaluation Figure 4-80 Checklist 2 – EFB Operational Evaluation.	Not Accepted. Out of Scope. This sort of evaluation is already handled in 8900.1.
37.	G, Schwab ASW-112	Page 1 para 4a	Last two words on the page: "EFBs host" appears to need to be deleted	Editorial	Remove text	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
38.	Silpa Uppalapati ASW-150	6.c.(2)	Don't agree with the use of ARP4754A, mentioned In 6.c.(2).	The reduction of Function Development Assurance Levels mentioned In ARP4754A Is not acceptable for safety	Should reference ARP4754 instead.	Acknowledged. We are recommending the use of these documents to help show compliance. Once draft AC covering their use is issued we can point to that instead.

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				critical systems and software.		
39.	George Harrum ASW-170	Page 1 Para 4.a	Paragraph ends mid-sentence.	Paragraph doesn't end correctly.	Finish the sentence/paragraph "EFB hosts can be classified as..."	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
40.	Kyle Cobble ASW-190	Pg 1, para 4.a., et al	References 20-176.	AC is not current version.	Use AC 20-176A.	Not Accepted. Para 7 states "All references to FAA documents in this AC are to the current version." This is common practice in our documents.
41.	Kyle Cobble ASW-190	Pg 1, para 4.a	Paragraph is cut short	NA	Finish paragraph.	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence. A correct version was circulated, but apparently didn't catch up with the commenter.
42.	Kyle Cobble ASW-190	Pg 4, para 5.b.(1)	Statement on switch may not be specific enough	Applicants may try to use only circuit protective device and unit power switch	Make it clear that the switch is in addition to the circuit protective device and the device power switch.	Accepted. Added note to read: "Note: The use of a circuit breaker as a means of de-powering a function is not acceptable since the repeated use of circuit breakers as switches can degrade their performance and prevent them from actuating at the rated current trip point."
43.	Kyle Cobble ASW-190	Pg 5, para	Phrase "Installed EFBs" is not well defined.	This needs to be defined, because	Either use Class 213 or define	Not Accepted. Scope clearly states "Specifically,

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		5.d.(3) et al		it could be interpreted to mean only Class 3 devices.	"Installed EFBs" early in the document.	this AC addresses design for installations incorporated into the aircraft type design."
44.	W. Cameron ANM-130S	Pg. 1, Para. 1a	Do we really describe how to design EFB components?	FAA doesn't normally design, just certify.	Describe items that should or must be considered in the design of ...	Accepted. Reworded opening paragraph to state: "a. This advisory circular (AC) provides guidance material on the design approval for installation of electronic flight bag (EFB) components and aircraft connectivity provisions. In it, the Federal Aviation Administration (FAA) describes certification considerations for the design of individual EFB components and for installing EFB aircraft connectivity provisions by addressing the principal elements, or "components," which comprise a typical EFB device or system."
45.	Tom Phan ANM-106B	Page 1 par 1, par. 2	Does this AC provides guidance for Class 3 EFB and Types A & B software applications only?	References to Class 1 and Class 2 EFBs and Type A & B software applications but no reference to Class 3 EFB or Type C SW application.	Clarification needed in the "Purpose" and "Background" sections.	Previously Accepted.

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46.	S. Safarian ANM-130L	Page 1, 3. Scope	There are numerous references to Class 1 & 2 EFB's and Type A & B applications but no reference to Class 3 EFB or Type C application.	The Airport Moving Map which is type C is allowed to be installed on Class 1 & 2. This application requires FSDO/PI approval and AEG evaluation. No ACO work involved unless there are provisions being installed for class 2 in the flight deck.	Scope should be more clearly defined.	Not Accepted. Scope is very specific and this AC only covers airworthiness issues, not operational authorization guidance which will reside in AC 120-76. We address design and installation guidance for individual EFB components and aircraft connectivity provisions incorporated into the aircraft type design. This allows us to handle the installation concerns of federated EFBs, as well as providing coverage on provisions for portable (Class 1 and 2) as well as installed EFBs. We intentionally use "installed EFBs" and "approved software" applications in this AC because we view their handling as no different than other avionics,
47.	S. Safarian ANM-130L N. Phan-Tran ANM-130L Tom Phan ANM-106B (same comment)	Page 1, 4. Background	1. States portable EFB's are not covered in this AC; however there is guidance for portable EFB's throughout this AC.	1. This statement is not consistent with the content of this AC. 2. Need additional clarifications for installed EFB display devices and how does this AC consistent	1. Revise background statement. AC 120-76A defines: Class 1 and Class 2 Hardware EFBs are Portables and considered PEDs (except mounting	Accepted. Revised Scope previously.

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				with classifications in AC 120-76A.	devices, power, data connectivity provisions for Class 2 are installed components and required AIR design approval); Class 3 EFB systems are considered installed equipment and required AIR design approval.	
48.	Varun Khanna TAD ANM-110	Page 1, 4. Backgroun d	Makes no mention of how to address provisions without the installation of an EFB (Class 2).	Class 2 provisions only also need to be addressed.	State Class 2.	Accepted. Added new last sentence to Para 4.c stating: “ Installation of provisions for portable EFBs requires design parameters for the expected performance of those provisions from the intended portable EFB (i.e., mounting (size and weight), power (maximum electrical load), and data connectivity (input/output specifications and security)).”
49.	Bruce Wood	Page 1, Para. 4 a	Appears to be missing text after: “EFBs host	Possible incomplete	Install text to complete	Accepted. This was caused by a conversion to

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	ASI/ANM108B 4/1/11 425-965-3916			sentence?	sentence.	pdf from the word version. The current version has an appropriate and complete sentence.
50.	Sandy Yamane SASI ANM-108V 4/1/11 818-904-6298 Ext. 232	Page 3-7, 5. Guidance for Individually Installed EFB Components.	Some of the items listed under "...Individually Installed EFB Components." could be considered Non-Essential, Non-Required Aircraft Cabin Systems & Equipment (CS&E).	There is FAA guidance in AC 20-168 (dated 7/22/2010) that addresses CS&E.	Recommend reviewing the individual components that may be subject to AC 20-168. Recommend referencing AC 20-168 in AC 20-EFB in the appropriate sections.	Not Accepted. AC 20-168 has a note in its purpose that clearly states "Note: This AC doesn't apply to any CS&E installed in the cockpit. Any CS&E that may interface with any required systems and equipment must be coordinated with the responsible aircraft certification office (ACO) for any additional certification considerations." As such, we provide this guidance.
51.	Tom Phan ANM-106B M. Kuttler ANM-150L (same comment)	Page 3, 5. Guidance for Individually Installed EFB Components.	Consider Flammability reqs in parts 23/25/27/29.	No guidance for components flammability. "Materials must meet the applicable test criteria described in part I of appendix F of this part."	Add material flammability requirements.	Accepted. Throughout this AC we state to apply all applicable airworthiness regulations. Added example.
52.	W. Cameron ANM-130S	Pg. 3, Para. 5.a	There should be a reference to 25.789, Retention of Items of Mass, and also the corresponding FARs in	This would be a primary requirement for a mounting device.		Accepted. Added sentence to 5.a.(2) to read "Mounting design must address the 14 CFR 25.789 requirements for the retention of items of mass for the

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			Parts 23, 27, & 29.			expected load factors anticipated when in use,”
53.	Steve Boyd ANM-110	Page 3, 5(a)(1)	This should reference the need to not compromise the intended function of other installed equipment	The provisions could jeopardize the XX.1301 compliance for other systems.	Add words to the effect that the provisions cannot interfere with the intended function of other installed systems and reference §XX.1301.	Accepted.
54.	Steve Boyd ANM-110	Page 3, 5(a)(5)	For part 25 airplanes, these cables would be considered Electrical Wiring Interface Systems (EWIS) and therefore would need to comply with part 25, subpart H, and §26.11.	Installed electrical cables (both power and data) are covered by the part 25/26 EWIS rules.	Add reference to the part 25 and 26 rules for transports.	Accepted.
55.	Steve Boyd ANM-110	Page 3, 5(a)(6)	Should add discussion of flight control travel.	Some of these mounts may cause restrictions in aft travel of the control for some pilots with large abdomens. This is sometimes an issue even without the	Add discussion of this issue.	Accepted. Added examples as follows: (i.e., size, weight, control travel, etc.).

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				addition of an EFB.		
56.	W. Cameron ANM-130S	Pg. 3-4, Para. 5.b	Guidance and design criteria already exists for electrical outlets in aircraft.	Shouldn't that be used rather than trying to implement new criteria that may conflict with existing ones?		Not Accepted. This AC incorporates the content of ANM-01-03A, PSS for PEDs policy memo and spreads that design guidance to 23/27/29 aircraft. This is not new guidance. We typically try to incorporate policy letter guidance in AC's versus referencing the policy letter.
57.	Steve Boyd ANM-110	Page 4, 5(b)(3)	This guidance may not be appropriate if operations are based on the operation of the EFBs, i.e., if the airline has been approved to use EFBs in lieu of conventional paper charts, checklists, etc.	If the non-essential busses are turned off for some other reason (e.g., because of problems with cabin equipment), the EFBs would be unpowered. If the airline is operating paperless, this would have a significant safety impact.	Include some discussion of the intended use. In general, I don't think that EFBs should be considered "non-essential," since in fact we are expecting pilots to use them for the safe operation of the airplane, and we intend for the flight decks to work toward being paperless.	Accepted. Added new last sentence to para 5(b)(3) to state: "Connection to more critical aircraft power buses is permitted if the intended function of the EFB warrants, but the ability of the crew to de-power the outlet for the EFB is paramount and must be addressed."

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58.	Varun Khanna ANM-110	Page 3, 5c	Two way data connectivity would require a network security assessment.	Even if you talk to an existing node on the airplane, how do you prevent a passenger from writing to the EFB/PED on the flight deck?		Acknowledged.
59.	N. Phan-Tran ANM-130L	Page 4, par. 5c., Data connectivity with Aircraft Systems (Wired or Wireless)	States: This section applies to both portable and installed EFBs	Clarify how this paragraph support the intend of this AC that does not cover the portable EFBs.		Not Accepted. This AC covers installation of EFB components. The intended EFB can be portable or installed.
60.	Steve Boyd ANM-110	Page 4, 5(c)	This section does not note any restrictions on the ability of a portable device to write to airplane systems. This may cause confusion.	AC 120-76A states: EFB data connections require AIR approval to ensure non-interference and isolation from aircraft systems during	Add a note that, IAW AC 120-76A, Class 1 EFBs can not write to any airplane systems and Class 2 EFBs can only write to AAC	Acknowledged. Existing 120-76 policy allowing portable EFB's to write to AAC systems has been replaced. The AC 20-EFB guidance allows the portable EFB to write to any aircraft system as long as it does so through an appropriate, approved, interface device.

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				transmission and reception. The EFB data connection may receive information from any aircraft system as well as receive or transmit information for AAC purposes. Connectivity may be wired or wireless.	systems.	
61.	Varun Khanna ANM-110	Page 4, 5c (2)	Interface protection device must be a part of the airplane and not the PED or the EFB. What do you envision the Interface protection device / security mechanism to look like?	Several reasons. 1. No DAL for PEDs, because they are not subject to DO-178B 2. Cannot be expected to protect the flight critical systems. 3. Provision installer has no knowledge of the airplane architecture,	Limit Portable PED to read only or ensure via a network security assessment that no security vulnerabilities exist or interfere with the data the pilot sees on the EFB/PED.	Accepted. Beefed up non-interference paragraph in cooperation with Peter Skaves and coordinated this language with Varun.

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				therefore would not be in a position to address protection. The PED by definition are uncontrolled. No physical security mechanisms can be applied.		
62.	Tom Phan ANM-106B	Page 4 par. 5 (c)	Consider TAD WLAN Issue Paper.	No guidance for wireless data connectivity and security.	Review and incorporate TAD WLAN IP.	Acknowledged. Regardless of whether there is wired or wireless connectivity, there must be non-interference. No security policy exists yet, so issue paper may still be appropriate route.
63.	Steve Boyd ANM-110	Page 5, 5(c)(2)(c))	Does not identify the possible need for special conditions.	EFBs can introduce security risks that are not accounted for in part 23/25/27/29. At least for part 25, a special condition may be needed.	Add a note that special conditions may be needed.	Acknowledged. Special conditions may be applied regardless.
64.	Steve Boyd ANM-110	Page 5, 5(d)	Since this is a 20-series AC, these would only apply to Class 3 EFBs.	We don't put MoCs for Ops evaluations in 20-series ACs.	Either change the designation to a 120-series or direct these criteria at Class	Accepted. Added new 2 nd sentence to 5(d) stating: "Guidance on portable displays is not covered in this AC, but may be covered in AC 120-76 or

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					3 EFBs only and delete reference to AC 91-78.	AC 91-78, as applicable.”
65.	Varun Khanna ANM-110	Page 5, 5d	Display. Touch screen issues not addressed.	For completeness. Some applicants may propose touch screens. There is a TAD IP that addresses touchscreens.	State that an issue paper may be needed, or include the MoC from the IP.	Acknowledged. We’ve chosen not to incorporate design approval guidance for touch screens, as this will be provided in AC 20-CNTL.
66.	Paul Bernado ANM-110	Page 5, 5.d.(1)	Paragraph on placement should address more than simply 25.773 compliance.	Missing guidance.	After first sentence add the following: “Placement also needs to consider many other factors: accessibility, workload effects, and potential pilot fatigue effects form use, etc.”	Accepted.
67.	Paul Bernado ANM-110	Page 5, 5.d.(1)	Need to strengthen language regarding 25.773 requirements consistent with current policy.	Accuracy with current regulatory requirements.	Replace last sentence with the following: “Day and night flight test are required by 25.773 for	Partially Accepted. Changed sentence to read “For applicant’s seeking compliance under 14 CFR § 25.773 for installed displays, flight testing in day and night conditions is the acceptable method to find compliance for these

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					installed equipment (i.e., Class 3 EFB). The FAA has accepted ground test in-lieu of night flight test, however this requires that the applicant formally request, and FAA make, an equivalent safety finding.”	issues. Applicants may develop equivalent level of safety (ELOS) justifications for alternative means of compliance, provided they are formally requested and agreed to by the FAA in advance.” ESBs have been made for both day and night flight testing, they just have to be agreed to in advance and this policy is also cross-FAR.
68.	N. Phan-Tran ANM-130L	Page 5, par. 5d(3), Recommended Display Standards	This section indicated that installed EFBs are multipurpose flight display devices and should follow TSO-C113, and other applicable ACs such as AC 25-11 or 23.1311-1.	Does this section infer the installed EFB as a flight desk display unit that hosts EFB applications?	If this is the case, we suggest to clearly describe the scope of the AC.	Acknowledged. This AC provides additional design considerations for displays that support EFB function (i.e., size, placement, etc.). Otherwise, an installed display is an MFD like any other. Altered Scope.
69.	Steve Boyd ANM-110	Page 5, 5.d.(3)	Current version is AC 25-11A.	References superseded version.	Correct reference.	Accepted. Current practice is to state as in para 7 that “All references to FAA documents in this AC are to the current version.”
70.	W. Cameron ANM-130S	Pg. 5, Para. 5.d.(3)	Not all installed EFBs have TSO C113 displays. Will this be a new	If an aircraft manufacturer develops and		Acknowledged. We recommend that applicants “should follow the design standards

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			requirement for all future installations?	installs an EFB as part of the TC or ATC, it would not have to be TSO'd to do that, e.g., the Boeing Class 3 EFB in their aircraft.		found in TSO-C113” We don’t require TSO compliance, but “recommend” the standards in it.
71.	Paul Bernado ANM-110	Page 6, 5.e.(4)	Not sure I understand this paragraph. Is this intended to head off applicants actually proposing a new cockpit display but calling it an EFB? (A Class 3 EFB, despite the “EFB” moniker, should be treated as any other installed equipment from a Part 25 certification perspective.). Is this intended to prevent use of laptops/PED’s etc that are not directly related to flight ops?	Clarity.	Perhaps simply best to say that installed equipment (as opposed to PEDs), whether supporting EFB applications or not, must meet all the requirements for certification.	Previously Accepted. Paragraph previously deleted by Bruce.
72.	N. Phan-Tran ANM-130L	Page 7, par 6, Guidance applicable to all	Environmental qualifications DO-160 need to be addressed.		AC 120-76A stated portable Class 1 or 2 EFB does not require compliance	Accepted. Portable components do not require DO-160, but installed components do. Added new subpara as follows “(1) Environmental Qualification. Ensure the environmental

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		installed EFB components			with DO-160.	qualification of all EFB components installed in the aircraft is appropriate using AC 21 16(), RTCA/DO-160 Versions D, E, F, and G, “Environmental Conditions and Test Procedures for Airborne Equipment,” to demonstrate equipment performance in environmental conditions encountered during operation of the equipment in aircraft.”
73.	Tom Phan ANM-106B	Page 7, 6. Guidance applicable to all installed EFB components	Consider DO-160 in Equipment qualifications and EMI/RFI on aircraft installation.	No guidance for Environmental conditions, EMI/HIRF/Lightning (DO-160).	Add guidance for equipment qual and aircraft installation reqs.	Accepted. Added new sub paras under 6.a to state “(2) Lightning Protection. Ensure EFB components installed as part of type design of the aircraft meet the lightning requirements of 14 CFR 23.1306, 25.1316, 27.1316, and 29.1316, electrical as appropriate. AC 20-136, Aircraft Electrical And Electronic System Lightning Protection, provides an acceptable method to demonstrate appropriate lightning protection. (3) High Intensity Radiated Fields (HIRF). Ensure EFB components installed as part of type design of the aircraft meet the HIRF requirements of 14 CFR 23.1308, 25.1317, 27.1317, and 29.1317, as appropriate. AC 20 158, The

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						<p>Certification of Aircraft Electrical and Electronic Systems For Operation In The High-Intensity Radiated Fields (HIRF) Environment, provides an acceptable method to demonstrate the equipment is protected when operating on an aircraft when the aircraft is exposed to an external HIRF environment.”</p>
74.	Varun Khanna ANM-110	General	<p>No mechanism proposed that would convey to the Airline/Operator what the worst case requirements are for the designed provisions. Only electrical aspects are specified. Cooling, Weight, for example are not addressed.</p>	<p>Proposed TAD Class 2 IP addresses these issues via the use of the ICA limitation section. This concept has been agreed to by ANM-100, AFS-200, and AFS-300.</p>	<p>Incorporate the language from the Class 2 provisions Issue Paper.</p>	<p>Accepted. Added note after 5.a.(7) to read: “Note: When the EFB mounting device is not intended for a specific EFB model, document the demonstrated performance parameters for the mounting device (e.g., weight parameters) in the airplane or rotorcraft flight manual (AFM), airplane or rotorcraft flight manual supplement (AFM/S), operating manual, or instructions for continued airworthiness (ICAs), as appropriate. Document and update limitations, aircraft performance data, maintenance, and operational requirements as prescribed by regulation.” This language was agreed to by TAD, AFS-300, and Peter Skaves and is consistent with AC 25.1581-1, Airplane Flight</p>

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						Manual.
75.	Varun Khanna ANM-110	General	TAD Proposed IP limits the selection to only those PED/EFBs that meet the worst case design parameters as defined by the approval holder of the Class 2 provisions. This was done to safeguard the airplane from devices that cannot be supported by the provisions. The proposed AC categorically places no limits on the selection of the EFB/PED. The IP on the other hand says only those EFB/PEDs that meet the worst case requirements can be approved.	We should have a harmonized position between the AC and the IP. Ideally, the AC should make the IP unnecessary. The IP is not intended to limit the functionality of the EFB, but only ensures that the physical/electrical characteristics of the selected EFB do not compromise the safety of the installed provisions.	Incorporate the language from the Class 2 provisions Issue Paper.	Previously Accepted. See previous comment 74.
76.	Varun Khanna ANM-110	General	While I like your overall proposal of saying installed or not installed, the old nomenclature of Class 1, 2 and 3 however confusing, is now	Please see comment.	Needs further discussion. Perhaps some reasonable wording can be worked out.	Previously Accepted. See previous comment 74.

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			reasonably well understood. To revert to a two class scenario does not take into account all the different ways the applicants like to slice and dice the EFB and the provisions. For example what if the OEM wants to install only the provisions and not the EFB itself? That choice of the EFB is left to the airline/operator. Where does that fall installed or portable. How does the installer of the provisions convey the design data/parameters to the airline operator?			
77.	Will Struck ANM-110	General	Placard guidance - AFM limitation or ICA for types of PEDs which can be attached in cradle.	Missing.		Previously Accepted. See previous comment 74.
78.	Will Struck ANM-110	General	AC 21-16F - EQT levels for noninterference, especially for wireless capability and EMI.	Missing.		Previously Accepted. See previous comments 72 and 73.
79.	W. Cameron ANM-130S	Multiple places	Reference to EFB AC should be AC 120-76A	AC 120-76 is cancelled by 76A.		Not Accepted. Para 7 states "All references to FAA documents in this AC are to the

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						current version.” This is common practice in our documents.
80.	Angeline Garrett AIR-500 DMO	Global Change	Improper plural of the term “part”.		The term “part” in the reference to the CFR should be placed in the singular form since you use a singular form conjunction “or”. For examples refer to paragraphs 1b, 5a(3),	Accepted.
81.	Angeline Garrett AIR-500 DMO	Global Change	Improper capitalization.	Non-compliance to memo sent by AGC on 1/24/94.	The term “part” should not be capitalized in reference unless it begins a sentence.	Accepted.
82.	Angeline Garrett AIR-500 DMO	Global Change	Incorrect font size in footer.		Use Arial or Times New Roman, 11 or 12pt.	Accepted.
83.	Angeline Garrett AIR-500 DMO	Paragraph 1a, 2 nd sentence, Page 1	Change wording.		Remove to read: In it, Federal Aviation Administration (FAA),	Accepted.

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					describes how to design EFB components and aircraft...	
84.	Angeline Garrett AIR-500 DMO	Paragraph 4a, last sentence, Page 1	Clarity.		Where is the rest of the sentence? It appears to be missing.	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
85.	Angeline Garrett AIR-500 DMO	Above Paragraph 2b, Page 2	Incorrect spacing.		There should be only two spaces between the header and the title of the first paragraph on the page.	Accepted. Changed top margin to .9 inches and it seems correct.
86.	Angeline Garrett AIR-500 DMO	Paragraph 5d(1), 3 rd sentence, Page 5	Improper usage of possession.		Rewrite to read: For applicants seeking compliance under 14 CFR § 25.773, flight test...	Accepted.
87.	Angeline Garrett AIR-500 DMO	Paragraph 5e, 1 st sentence, Page 5	Improper plural of the acronym "OS".		Remove the "s" from the acronym "OS" found after the term "systems".	Accepted.
88.	Angeline Garrett AIR-500 DMO	Paragraph 5f, 2 nd sentence	Unnecessary bold/highlight.		Remove the bold or highlight from	Acknowledged. This was only to highlight the draft document. It will be changed before

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		, Page 6			the title of “AC 20-CNTL” and just update the AC number during the final draft. Update AC reference and remove bold highlighted font.	submitted to DMO.
89.	Angeline Garrett AIR-500 DMO	Paragraph 5g, 3 rd sentence , Page 6	Improper usage of possession.		Remove the apostrophe from the term “applicants”.	Accepted.
90.	Angeline Garrett AIR-500 DMO	Paragraph 5g, 3 rd sentence , Page 7	Define the term “Aircraft Certification Office” first.		Use the acronym “ACO” after the first usage.	Accepted.
91.	Angeline Garrett AIR-500 DMO	Paragraph 7, Page 7	Missing bold.		Bold the number 7.	Accepted.
92.	Angeline Garrett AIR-500 DMO	Paragraph 7a, 1 st sentence , Page 7	Outdated information.		Remove the mailing information for the DOT Distribution Office. We do not print or stock ACs anymore at the	Accepted.

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					warehouse. You can only retrieve them electronically.	
93.	Angeline Garrett AIR-500 DMO	Paragraph 7a, 2 nd sentence, Page 7	Change wording.		Rewrite to read: You can get copies from our website at....	Accepted.
94.	Angeline Garrett AIR-500 DMO	Paragraph 7a(5), Page 8	Unnecessary bold/highlight.	Inconsistent with the rest the document.	Update AC information for "AC 20-CNTLand remove highlight.	Acknowledged. This was only to highlight the draft document. It will be changed before submitted to DMO.
95.	Angeline Garrett AIR-500 DMO	Signature Block, Page 9	Incorrect font.		Use Times New Roman, 12pt. for the title "Aircraft Certification Service".	Accepted.
96.	Scott Gesele ANE-172		The AC states that EFBs may be portable or installed. There is no guidance, or definition, of what constitutes "portable" or "installed".	During past projects applicants have taken a liberal approach as to what constitutes "portable equipment". In one case, 36 pounds of equipment was	Provide a clear definition of what is considered a portable electronic device or installed equipment for the purpose of this AC.	Accepted. Updated Para 4.d by adding: "Some EFB configurations do not fall neatly into the EFB Class definitions found in AC 120-76. They may have some components installed, but not a complete system, or the hardware is all installed, but is designed to accommodate Type A and B flight bag applications. The applicant is responsible for

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				"installed" on the flight deck, secured by thumb screws. Tools were not required to remove the equipment. It was considered "portable", even though it was understood that this equipment was not going to be removed on a routine basis.	For example, could a device, secured by a thumb screw, but located in an EE bay be considered a PED?	identifying what components or provisions are installed. This AC is organized around these components."
97.	Scott Gesele ANE-172	Page 4, Par 5.b(3)	The AC states that the EFB power provision is to be connected to non-essential power busses. This does not take into consideration aircraft that do not have a non-essential bus.	Not all aircraft have a non essential power bus. This is common in the Part 23/27 world.	Add the words, "or least critical" when describing the bus that the EFB may be connected to.	Accepted.
98.	Scott Gesele ANE-172	Page 6, Par 5.g	The first word of the third sentence appears to have a typo.	Applicant's should be Applicants.	Remove the apostrophe.	Previously Accepted.
99.	Scott Gesele ANE-172	Page 1, Par 4.a	The last sentence of this paragraph appears to be cut off.	The entire sentence consists of the following: EFBs host	Remove, or complete the last sentence.	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.

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100	Scott Gesele ANE-172	Page 4, Par 5.b(1)	Make it clear if the intent of this paragraph is to require an actual switch, or if a pull/toggle type circuit breaker may be used as this required switch. See existing Policy ANM-01-111-165, Par 1.a.(1).(c)	I have been involved in lengthy discussions with an experienced applicant who insisted that a circuit breaker be used for this function. This was during a Class 2 EFB project.	Clarify this section.	Previously Accepted. Added note to clarify that a circuit breaker is not an appropriate switch.
101	Michael Davison ANE-150	Page 3 Para 5.a.(3)	This AC should also mention flammability requirements for the mounting device.	I've run across applicants trying to use mounting devices that would not meet flammability/crashworthiness requirements outlined in the applicable FAR part.	Add references to flammability requirements.	Accepted. We require design of EFB components to address applicable airworthiness regulations, so flammability must be complied with, among many others.
102	Keith Butcher AFS-460	Pg 1 Para 4	Last sentence needs to be reworded "and are not covered in this AC"			Accepted.
103	Keith Butcher AFS-460	Pg 1 Para 4.a	Missing the rest of the sentence and the page number 1 on the page.			Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate

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						and complete sentence.
104	Keith Butcher AFS-460	Pg 3 Para 5.a	“portable” confusing, recommend stating which type of portable equipment is covered here.			Accepted.
105	AFS-360 TWS	1 para 4.a.	There is "ACI20-76" all by itself at the end of this para ...	editorial	Delete orphaned AC120-76	Accepted. This was caused by a conversion to pdf from the word version. The current version has an appropriate and complete sentence.
106	AFS-360 TWS	6 para d et al	This section provides design guidance for the installation of EFB displays. This could be confused with the actual laptop displays.	Confusion	Change all references in this section to read EFB portable displays -or- portable displays"	Not Accepted. Section does not deal with portable displays, only installed. 2 nd sentence of opening paragraph says explicitly “The suitability of portable displays is considered under the operational evaluation found in AC 120-76 or AC 91-78, as applicable.”