

Comments for Draft Revisions (Not Applicable to Directives; Refer to Directive Management Officer for Directive Comment Format)

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| # | Document Name | Page Number | Paragraph Number | Referenced Text | Comment/Rationale or Question | Proposed Resolution | Comment Type (Conceptual, Editorial, or Format) | Disposition/Response to Comment |
| 1 | AC No: 20-172B | 10 | 2.4(a):CDTI | Installation in a forward position requiring minimum head and eye movement (14 CFR 23.1321, 25.1321, 27.1321, and 29.1321) will provide the best situation awareness and support subsequent upgrades to other ADS-B applications. | This could severely restrict the introduction of CDTI applications into the legacy fleet by means of a retrofit. In many cases it will not be practical, nor feasible, to make changes to displays in the forward Field of View (FOV). This limitation will restrict the availability of the safety benefits afforded by CDTI to the retrofit fleet. It should also be noted that for a two-person cockpit, the pilot-not-flying is normally delegated the monitoring tasks and therefore this restriction may be unduly restrictive. | Modify sentence such that the intended function is required to be successfully demonstrated in the selected display location. | Conceptual | No change. This is a true statement and represents the view of FAA for how we expect ADS-B In displays to be integrated into the flight deck for operational approval of spacing operations. |
| 2 | AC No: 20-172B | 10 | 2.4(b):CDTI | The traffic display (plan view) must be visible during the ITP vertical maneuver. | A currently certified ITP installation provides a traffic display in plan or vertical view. The language may imply that an installation must have plan view up and may optionally also have vertical traffic display | Change the sentence "The traffic display (plan view) must be visible during the ITP vertical maneuver. ", to "The traffic display (plan view or vertical view) must be visible during the ITP vertical maneuver " | Conceptual | No change.This language did not change from AC 20-172A and represents the previously resolved public comments. |

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| 3 | AC No: 20-172B | 11 | 2.4(d):CDTI | For installations that include the CAVS application, Traffic Identification, Ownship Ground Speed, Traffic Ground Speed, Differential Ground Speed (when aircraft are in-trail) and Digital Traffic Range must be displayed in the primary field of view to facilitate pilot monitoring. Refer to AC 25-11B. CAVS installations must include a means to designate traffic for CAVS. | This could severely restrict the introduction of CDTI applications into the legacy fleet by means of a retrofit. In many cases it will not be practical, nor feasible, to make changes to displays in the primary FOV. This limitation will restrict the availability of the safety benefits afforded by CDTI to the retrofit fleet. It should also be noted that for a two-person cockpit, the pilot-not-flying is normally delegated the monitoring tasks and therefore this restriction may be unduly restrictive. | Modify sentence such that the intended function is required to be successfully demonstrated in the selected display location. | Conceptual | Text modified to be consistent with the negotiated position in DO-317B. |
| 4 | AC No: 20-172B | 12 | 2.4(f)4d | (d) If automatic decluttering is implemented, a means should be provided for the flight crew to control the automated decluttering function. | In some cases it may not be possible to do this. For example, how will this be handled for range based-decluttering? | Modify sentence such that the intended function (for the automatic decluttering) is unambiguous to the flight crew. | Conceptual | No change. This language did not change from AC 20-172A and represents the previously resolved public comments. |
| | AC No: 20-172B | 13 | 2.4(f)4e | (e) An indication that decluttering is active must be provided. | In some cases it may not be possible to do this. For example, how will this be handled for range based-decluttering? | Modify sentence such that the intended function (for the automatic decluttering) is unambiguous to the flight crew. | Conceptual | No change. Display range is not considered decluttering by DO-317 or AC 20-172. Decluttering performed as a function of display range is considered automatic decluttering and the flight crew must have a means to 1) know that decluttering is active and 2) control the decluttering function. This language did not change from AC 20-172A and represents the previously resolved public |

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| 6 | AC No: 20-172B | 13 | 2.5(a) | Alerts should be consistent with the flight deck alerting system and philosophy, and should not interfere with higher priority alerts. Alerts should be consistent with, and capable of being integrated into the flight deck alerting system, giving proper priority to alerts with regard to safety of flight. | These two sentence are almost identical. Retrofit applications also need to be considered. | Use just one of the sentences. Also add specific guidance for retrofit condition. Something along the lines of AC 25.1322-1 14.a.(2): The existing alerting system might not be able to facilitate the integration of additional systems and associated alerts due to limitations in the system inputs, incompatible technologies between the airplane and the system being added, or economic considerations. | Conceptual | Partial Accept. Deleted second sentence to remove redundancy. No change to address retro-fit installations. The desired installation "should" be integrated with the existing alerting system. Retro-fit installations where this is not practical must be addressed case-by-case with the regional ACO. |
| 7 | AC No: 20-172B | 13 | 2.5(b) | Each ATAS aural alert should be annunciated by a dedicated voice message which is compatible with other onboard aural alerting systems. | It is not clear what "compatible" means. Does it mean voice gender, speech rate, audio intensity, message content, etc? | We suggest referring the reader to AC 25.1322-1: Appendix 2 to clarify compatibility and examples for Including Aural System Elements in an Alerting System. | Conceptual | Accept. Reworded to clarify intent. |
| 8 | AC No: 20-172B | 19 | 3-2(j) | For ATAS and CAVS installations, verify that aural alerts can be inhibited by higher priority alerts (e.g. TAWS, Windshear). | Some retrofit solutions may not be fully integrated into the EICAS/CAS/EICAM system due to physical constraints of a legacy system. The reader should be referred to AC 25.1322 for retrofit alerting system considerations. | The reader should be referred to AC 25.1322 for retrofit alerting system considerations. | Conceptual | No change. Approval of the STC will require compliance with this guidance. |

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| 9 | AC No: 20-172B | 19 | 3-2(l) | I. For CAVS installations, the following data must be displayed in the pilot's primary field of view: | This could severely restrict the introduction of CDTI applications into the legacy fleet by means of a retrofit. In many cases it will not be practical, nor feasible, to make changes to displays in the primary FOV. This limitation will restrict the availability of the safety benefits afforded by CDTI to the retrofit fleet. It should also be noted that for a two-person cockpit, the pilot-not-flying is normally delegated the monitoring tasks and therefore this restriction may be unduly restrictive. | Modify sentence such that the intended function is required to be successfully demonstrated in the selected display location. | Conceptual | Text modified to be consistent with the negotiated position in DO-317B. |
| 10 | AC No: 20-172B | 20 | 3-3(b) | Individual ITP scenarios to test each ITP geometry may be performed in a conformed ground simulator environment. | Conformed tests as defined in AC 25.1302: tests require a conformed product/system, and system interface; and the authorities or their designee must be present. A test can be conducted on a bench/laboratory, in a simulator, or on an aircraft. | Modify sentence such that the applicant selects an appropriate means of compliance. More than one means of compliance may apply. | Conceptual | No change. This language did not change from AC 20-172A and represents the previously resolved public comments. |

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| 11 | AC No: 20-172B | 16 | Chapter 3 Test and Evaluation | The whole section. | This whole section seems to rely exclusively on Ground Tests and Flight Tests as means of compliance. However, it is normal to incorporate other means of compliance in a certification program, such as analysis, system description, in-flight evaluation (conformity not required), bench evaluation, part-tasks simulators (conformity not required). | Allow the applicant to select means of compliance appropriate for the functionality. | Conceptual | No change. The guidance in section 3 is meant to establish suitability of an aircraft installation of ADS-B In equipment in support of a TC, STC, or ammended TC project. The ground and flight test portions of this chapter are a very small subset of the verification required for design approval of ADS-B In equipment and represent a sample of functionality visible at the aircraft level. |