

**Clearance Record
DOCUMENT COMMENT LOG**

Commenter	Page & Paragraph	Comment	Reason for Comment	Suggested Change	Comment Resolution
ANAC Brazil	Page 130	This subject is covered in AC 23-16.		Update to AC 23-16A.	Concur
Cessna Engineering	1.c.			Recommends that the FAA update the language to reflect ODA (it mentions DAS, DOA, etc but no ODA)	Concur
Cessna Engineering	23.175 Demonstration of Static Longitudinal Stability	<p>Cessna Engineering notes that two references in Section 23.175a to Figure 72-1 should be to Figure 71-1.</p> <p>Second, Cessna Engineering does not believe that the Acceleration-Deceleration method description in Section 23.175(b)(1) that addresses 14 CFR 23.175(a) Climb procedures is appropriate for climb conditions.</p>		It should be clarified that the Acceleration-Deceleration method should be limited to tests that are initiated with the airplane trimmed with power for level flight as defined by 14 CFR 23.175(b) <i>Cruise</i> .	Concur

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Cessna Engineering	23.207 Stall Warning	<p>Cessna engineering believes that a change to Section 23.207 (was Section 89) that was made during the revision from 23-8A to 23-8B inadvertently removed significant guidance regarding evaluation of stall warning margin.</p> <p>With the issue of AC 23-8B, paragraph 89a(4) was removed, presumably due to the change at Amdt 23-50 that removed the upper bound of stall warning of 10 knots or 15 percent. However, paragraph 89a(4) contained the statement that the stall warning margin requirement “is applicable when the speed is reduced at the rate of one knot per second.” This is significant clarifying guidance since the corresponding stall maneuvers defined in 14 CFR 23.201(b) and 23.203(a)(1) require that the stall entry deceleration “not exceed one knot per second” which, without</p>		Cessna Engineering recommends a clarification specifying that the 23.207(c) stall warning margin requirement is applicable when the speed is reduced at one knot per second (similar to AC 23-8A paragraph 89a(4)) be reintroduced in AC 23-8C as paragraph 23.207a(4).	Concur

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		<p>further clarification, leaves open the possibility of applying the stall warning requirement at entry rates less than one knot per second.</p> <p>There is no evidence that Amdt 23-50 intended a change from evaluating stall warning margin at one knot per second. The NPRM for 23-50, which drove the change from 23-8A to 23-8B, does not discuss such a change and in fact the 23.207 discussion specifically refers to “one knot per second deceleration stalls.” The following is an excerpt from the NPRM for Amdt 23-50: “Proposed Sec. 23.207 (c) would reference the stall tests required by Sec. 23.201 (b) and Sec. 23.203(a)(1) and specify that during such tests for one knot per second deceleration stalls, both wings level and turning the stall must begin at a speed exceeding the stalling speed</p>			

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		by a margin of not less than 5 knots.”			
Cessna Engineering	23.1353 Storage Battery Design and Installation	Cessna Engineering disagrees with this arbitrary delineation of battery endurance between less than and greater than 25,000 feet. Perhaps a performance based rule would read: the greater of 30 minutes or the d demonstrated safe descent from max certificated altitude to a simulated landing plus 10 minutes. This would scale the requirement to the performance capability and equipage of the aircraft (e.g. speed brakes that can allow a more rapid descent for a >25,000 aircraft than a lower performance aircraft not so equipped).			We tried this and we had some real interesting proposals from new companies. Performance based should be better, but it did not work out that way. We did not get realistic designs or emergency procedures so we fell back to defining a specific altitude.

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Embraer	23.55 b(11), page 41	We are not sure what is meant by “Similarly, for turbojet aircraft, the critical engine’s power lever should be in the position it would normally assume when an engine fails.”		Is this to address some type of autothrottle functionality?	Not really since this AC was written before FADECs were common. But it could address autothrottle. The intent was so that the pilot did not pull the power lever to idle. This paragraph was revised.
Embraer	23.55.b(13), page 42	Embraer does not believe that it is feasible for an AFM to convey the level of “Aggression” that is necessary to replicate the performance data published in the AFM. This can only be practically addressed in training. We also do not believe that it is necessary to replicate the procedures in both the performance section and the normal/emergency section.		We believe that the existing test is adequate and should not be modified as proposed.	Non-concur. Landing overruns are a problem for small part 23 jets, perhaps more so than for all business jets. Adding language to the AFM was a recommendation from a recent part 23 Certification Process Study (CPS).
Embraer	23.75.a(4), page 62	This paragraph says that existing flight test practices are not adequate for jet airplanes, but provides no guidance on what additional or different evaluations should be conducted. It would be useful to expand on the FAA’s expectations for jet		Embraer believes that the immediate need after an electrical failure is not for all the information necessary for continued safe flight and landing (which would include things like communication	Concur with your comment concerning flight test practices. That paragraph has been revised. Comment addressing electrical failure should actually reference AC 23-17 or 23.1311, the systems ACs.

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		airplanes. The AC would require that one display of information essential for continued safe flight and landing will be available within one second to the crew with a single pilot action or by automatic means for continued safe operation.		frequencies, navigation information, etc), but that which is necessary for immediate control of the airplane. We believe the “one second” requirement should be limited to attitude display as it is in AC 25-11A for function after power transients.	This requirement is more stringent than part 25 to address part 23 pilots and operations. Most noticeable is that part 25 system failure requirements take into account two crew and 121 operations where as part 23 has to consider part 91, single pilot, IFR operations.
Cirrus Design	23.21(b)(2) on page 12	A recent test program at Cirrus Design incorporated the use of a Garmin GDC 74A air data computer (ADC) as the primary altitude and airspeed instrumentation. This ADC was calibrated by Capital Avionics of Tallahassee, FL, per the requirements of AC 23-8B. The airspeed indicator indicated airspeed was plotted against the corrected indicated airspeed, and a linear curve-fit was applied to the data. The resulting coefficient of determination (R2) of the linear fit was equal to 1.0000. Likewise, the altimeter indicated altitude		It is proposed that verbiage similar to the following be added to 23.21(b)(2) on page 12 of AC 23-8C: (2) <i>Instrument Calibration.</i> Test instrumentation (transducers, mechanical indicators, and other installed instrumentation) should be calibrated (removed from the airplane and bench checked by an approved method in an approved facility) within 6 months of the tests. Electronic test instrumentation (pressure transducers, air data computers, etc.) should be calibrated within 12	Disagree. This issue may be OK and may not be OK. Depends on specific system. It is possible to ask for a different calibration schedule on a case by case basis.

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		<p>was plotted against the corrected indicated altitude with a resulting curve fit R2 value of 1.0000. Not only is the accuracy of these transducers remarkable, but the susceptibility of the calibration to drift is substantially reduced. Over time, mechanical instruments are prone to wear and varying degrees of friction within the instrument. These factors lead to changes in the calibration of the instrument. With electronic pressure transducers, these effects are essentially eliminated. It is desired to see the next revision of AC 23-8C <i>Flight Test Guide for Certification of Part 23 Airplanes</i> incorporate instrument calibration requirements consistent with today's technology. It</p>		<p>months of testing. When electronic recording devices are used, such as oscillographs, data loggers, and other electronic data acquisition devices, preflight and postflight parameter recalibrations should be run for each test flight to ensure that none of the parameters have shifted from their initial zero settings. Critical transducers and indicators for critical tests (for example, airspeed indicators and pressure transducers for flight tests to VD) should be calibrated within 60 days of the test in addition to the other requirements mentioned above. The instrument hysteresis should be known; therefore, readings at suitable increments should be taken in both increasing and decreasing directions. Calibration records, like the one shown in Table 6-</p>	

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				<p>3, should be signed by the agent of the repair or overhaul facility doing the work and be available to the test pilot prior to beginning test flying. It should be emphasized that these calibrations must be accomplished at an approved facility. For example, performing a pitot-static/air data system leak check to "calibrate" an airspeed indicator, whether in or out of the airplane, is not acceptable."</p>	
	Page 10, para 23.21a(2)	<p>1st sentence states, "Section 21.35 requires, in part, that the applicant make flight tests and report the results of the flight tests prior to official FAA Type Inspection Authorization testing." This statement is no correct. Section 21.35 only requires the applicant to submit the report and does not specify prior to TIA.</p>			Concur – revised

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	Pg 10, para 23.21a.(3) Use of Ballast	This paragraph should also mention the need to mark the location of ballast, per 23.1557.			Non-concur – this is for TC’s airplanes.
	Page 15, para 23.25a Explanation.	This paragraph should also include minimum weight.			No really for part 23
	Page 17, para 23.29a Explanation	This explanation is missing from this paragraph			Actually these are the explanations.
	Page 17, para 23.31a.	Second sentence should refer to paragraph 3, not 6.			Concur
	Page 91, para 23.201a. Explanation	The first sentence states, Section 23.201© defines when the airplane can be considered stalled for airplane certification purposes.”		Should be section 23.201(b)	Concur

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