

PS-ANE-33.73-01 Comment Disposition Document
Internal Comments
January 2012 Disposition

1. Document No.: PS-ANE-33.73-01 (DRAFT)	2. Project Manager: John Fisher, ANE-111	3. Reviewing Office: Consolidated Internal Comments	4. Date of Review: July 7, 2009	5. Date of Disposition: January 25, 2012	
Instructions for Completing the Document Review Log					
<p>Blocks 1 & 2: To be completed by project manager prior to sending out for comments.</p> <p>Blocks 3 & 4: To be completed by reviewing office. Enter office symbol, reviewers name and phone number.</p> <p>Block 5: To be completed by project manager after receiving comments from reviewing office. Enter date of disposition.</p> <p>The below columns are to be completed by the reviewing office, except for the “Disposition” column.</p> <p>Project manager’s disposition in comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as:</p> <ul style="list-style-type: none"> • Adopted; • Partially Adopted; • Non-Concur; • Concur but Outside of Scope (Will be considered in next change/revision); or • Answer to Question or Statement. 					
Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:

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<p style="text-align: center;">1 ANE-150</p>	<p>Page 1, par 2a</p>	<p>Should the intention be to ensure appropriate engine response throughout the entire flight envelope (namely, above the takeoff/landing altitudes where a go-around might be necessary) so as to deal with evasive maneuvers, severe gusts etc that might require the sudden application of high power. These are in the "non-landing" phases of flight might but it might be advisable for applicants to address these conditions too.</p>	<p>Commenter asks question to author.</p>	<p>The commenter suggests looking at other phases of flight.</p>	<p>Answer Question: The commenter's suggestion is beyond the scope of the policy and the rule.</p>
<p style="text-align: center;">2 ANE-150</p>	<p>Page 2, par 4a</p>	<p>If tailored schedules are required to be addressed, would it be necessary to conduct the demonstration (or analysis) with the effects of ice accretion in the engine?</p>	<p>Commenter asks question to author.</p>	<p>The commenter appears to be saying, include ice effects of icing control system schedule when evaluating 33.73.</p>	<p>Answer Question: The intent of the policy is to evaluate control system effects on thrust response and not to evaluate environmental effects.</p>

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<p>3 ANE-150</p>	<p>Page 2, par 4a</p>	<p>Tailored schedules are known to have been created to deal with bird ingestion and inclement weather but it's unclear whether the critical point analysis should presume these types of ingestion threats.</p>	<p>None given</p>	<p>Commenter states that it is unclear whether the policy intends to address the tailored control system conditions of bird ingestion and inclement weather.</p> <p>No suggested wording changes proposed.</p>	<p>Answer Question:</p> <p>As the policy states, the applicant should assess the most critical condition including where tailored schedules are invoked.</p>
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4 ACE-118C	Page 2, par 4a(2)	Although the effects of tailored control system schedules may be assessed by analysis they must be demonstrated by test. Test or analysis is not an appropriate statement.	None given	Commenter states that analysis is inappropriate and test is required.	Non-concur The author believes that either test or analysis can be used for compliance for the tailored schedules demonstration. This is because in many cases the control schedule can not be activated in the engine test cell during the conduct of 33.73 compliance demonstration. Using a calibrated model is a typical and acceptable method for demonstrating off schedule operation, and therefore is deemed acceptable for addressing this policy.
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<p style="text-align: center;">5 AIR-103</p>	<p style="text-align: center;">GENERAL</p>	<p>(1) Each certification rule cited in the Draft Policy Memo is incomplete. To be consistent with FAA and other Government documents, the rules as cited must conform to a standard format.</p> <p>(2) We recommend that this Draft Policy Memo be reviewed by the writer/editor staff before distribution.</p>	<p>The central function of a legal citation is to allow the reader to efficiently locate the cited source. Thus, the citation forms in <i>The Bluebook</i> are designed to provide the information necessary to lead the reader directly to the specific items cited. Always be sure to provide sufficient information to allow the reader to find the cited material quickly and easily.</p>	<p>Commenter states: In each instance where a rule is cited as “§ xx.xx”, including the Subject line, replace with “14 CFR § xx.xx.”</p> <p>In each instance where there is “part 33”, replace with “14 CFR part 33.”</p>	<p>Non-concur</p> <p>(1) A policy statement (PS) is not a regulatory document. Citations used in the PS are for reference. ARM style is to use the full citation the first time and the abbreviated “§ xx.xx” thereafter for reference to a specific section.</p> <p>(2) ARM policy is to use the full citation the first time and the abbreviated “part 33” thereafter for reference to a specific part.</p>
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6 AIR-103	Page 1; Paragraph 1.	The first sentence needs to be modified slightly, to correctly cite the rule.	None given	Commenter states: Revise the sentence as follows: "... response standards of Title 14 of the Code of Federal Regulations (14 CFR) part 33."	Non-concur A PS is not a regulatory document. The sentence is correct to ARM standards.
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<p>7 AIR-110</p>	<p>Page 1 Par. 2. b.</p>	<p>In the following sentence: “Due to the difficulty in meeting this § 33.73(b) requirement, the FAA has allowed at least one equivalent level of safety (ELOS)-based exemption when the engine was shown to still be in compliance with the installed thrust response requirements of § 25.119.” – Why are you mixing an ELOS with an exemption?</p>	<p>An ELOS finding will be granted when literal compliance with a certification regulation cannot be shown and compensating factors exist which can be shown to provide an ELOS (Refer to 14 CFR § 21.21 (b)(1)). On the other hand, an exemption is a grant of relief to an applicant from the requirement of a specified airworthiness standard. A petition for exemption follows the procedures for public comment on rulemaking that are described in 14 CFR part 11. The FAA considers the following before granting an exemption: the requested exemption must benefit the public as a whole; and, granting the exemption would either not adversely affect safety or the exemption would provide a level of safety at least equal to that provided by the rule from which relief is sought.</p>	<p>Commenter states: You should revise your document and decide if your intent was to discuss ELOS or if it was to discuss Exemptions.</p>	<p>Partially concur. The ELOS and exemption discussion will be removed from the memo due to the potential for confusing the main intent of the memo.</p>
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			<p>Is this what you were trying to say?</p> <p>“ Use ELOS Finding Instead of an Exemption, if Possible. If the applicant’s petition for exemption makes a case that the proposal would provide a level of safety at least equal to that provided by the rule from which relief is sought, the FAA may agree to make an ELOS finding rather than go through the rulemaking process of an exemption. ELOS findings can generally be made more quickly than exemptions. Coordinating the petition for exemption with the accountable directorate will allow this determination to be made.”</p>		
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<p style="text-align: center;">8 AIR-110</p>	<p>GENERAL: Throughout the whole document.</p>	<p>Each certification rule cited in this draft document is incomplete. The rules as cited must conform to a standard format.</p>	<p>Always be sure to provide sufficient information to allow the reader to find the cited material quickly and easily.</p>	<p>Commenter states: Please have your writer/editor staff or contractor review this draft document before distribution. - In each case where a rule is cited as “§xx.xx”, including the subject line, replace with 14 CFR § xx.xx.” - In each case where there are two or more rules quoted, replace the existing quote with “14 CFR §§ xx.xx and yy.yy.” - IN each case where there is “part 33”, replace with “14 CFR part 33”.</p>	<p>Non-concur</p> <p>(1) A PS is not a regulatory document. Citations used in the PS are for reference. ARM style is to use the full citation the first time and the abbreviated “§ xx.xx” thereafter for reference to a specific section.</p> <p>(2) ARM policy is to use the full citation the first time and the abbreviated “part 33” thereafter for reference to a specific part.</p>