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Normal and Transport Category Rotorcraft Certification (Docket No. FAA-2017-0990)

The Aircraft Electronics Association (AEA) appreciates the opportunity to comment on the recent Notice of Proposed Rulemaking (NPRM) on amend the certification standards of normal and transport category helicopters.

The Association represents more than 1300 aviation businesses worldwide, including repair stations that specialize in maintenance, repair and installation of avionics and electronic systems in general aviation aircraft. AEA membership also includes instrument facilities, manufacturers of avionics equipment, instrument manufacturers, airframe manufacturers, test equipment manufacturers, major distributors, and educational institutions.

AEA supports the proposed amendments.

As technology advances, it is imperative that the certification standards for rotorcraft, as well as all aircraft, provide a performance based outcome objective without prescriptively defining what technology can satisfy the requirement.

While a relatively prescriptive regulatory system was acceptable for the first half century of flight, it is clear that in the last two decades technology is advancing faster than the speed of rulemaking. Therefore, it is critically important for the Agency to eliminate defining the performance criteria based on yesterday's accepted technology but rather define the safety objective wherever and whenever possible.

The one area of concern in the proposed amendment is with reference to Rotorcraft Equipment, Systems, and Installations (§§ 27.1309, 29.1309, and Appendix C to Part 27). New technology often "looks different": six independent instruments are now combined into a single screen. While the revised amendment is intended to modernize these criteria, the Agency must modernize its oversight of the certifications. Instruments provide information and data, the certification of the next generation of instrumentation must focus on the data rather than the looks of the instrument. Many legacy engineers reject new technologies because they are not familiar with the technology: "I was trained

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on steam gauges and these new “flat screen displays” are too confusing to me.....” is NOT the position I would expect the certifying Agency to be in.

It is critically important that (1) the Agency provide the resources necessary to train and educate the certifying authorities on the technologies they are being asked to approve; and (2) the Agency must provide enough oversight to recognize the personal biases that may exist in certifying authority.

In closing, the Aircraft Electronics Association support this proposal regulation as written.

The Aircraft Electronics Association appreciates the opportunity to comment on this proposed regulation and the opportunity to support these safety-enhancing additional changes. Should you have any questions, please do not hesitate to contact us at (202) 589-1144 or e-mail at: ricp@aea.net.

Sincerely,



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