

Comment/Response Document

NPA 25E-268 Control of Engine Rotation

3 Comments were received from the following:

Airbus Industrie (AECMA)
CAA
DGAC
JAA Certification Director

NOTE: *A further 11 commenters agreed the proposal or had no comment.*

4 Analysis of JSA Comments

4.1 Comment: *Two commenters noted that proposal A should require sub-paragraph JAR 25.903(c)(1) to be deleted (not JAR 25.903(c)).*

Response: *We agree and this change will be implemented.*

4.2 Comment: *One commenter was concerned that old, non JAR-E certificated engines, for which no 'windmilling without oil' capability had been demonstrated, might be fitted to new JAR-25 aeroplanes.*

Response: *Although the above situation could happen, it is not seen likely since the general trend is towards using 'new' engines to obtain maximum efficiency. Additionally, although JAR-E, (and in future, FAR 33) will continue to require windmilling without oil to be shown to be safe, there has not been any extensive evidence that:*

(i) current engine designs have any difficulty in meeting this requirement and

(ii) hazards have been caused in service with old (non JAR-E) engines.

No change is proposed.

4.3 Comment: *Two commenters noted that the proposal for new sub-paragraph JAR 25.903(c) should be clarified.*

Response: *We agree and the revised NPA text will include the new text for this sub-paragraph.*

4.4 *One commenter noted that JAR-25 introduces a reference to JAR 25.903(c)(2) in JAR 25.1141(e) in Change 1 and that a revision to the NPA is required for consistency.*

Response: *We agree and the necessary change will be implemented.*