

Comment Response Document

NPA 22C&D-84

After circulation of the NPA to the Regulation Committee four comments were received.

Comments were received from following Committee members:

CAA Denmark
CAA UK
LBA
German Glider Manufacturer Association

Review of comments:

CAA Denmark agrees.

CAA UK: criticized the use of the word "limiting" in place of the existing "limit", and this was accepted by the SG.

LBA: The change from 1.5 to 1.77 m/s increases the acceleration to 4.5 g; this is against the recommendation of a research report (L-5/84 Vorschläge zur Aufnahme in JAR22 zur Festlegung der erforderlichen Arbeitsaufnahme von Fahrwerken an Segelflugzeugen Oct. 87), where the acceleration should not exceed 4 g. The LBA commenter feels that the max. acceleration should remain 4 g, at least for two-seaters, although they will accept 4.5 g for a single-seater, in both cases where the aircraft are used for training. The LBA commenter, Mr. Kopp, agreed that he could accept 4.5 g and if there was later shown to be a case for 4 g (as a result of research) then we could create a new NPA to address this.

Mr. Volck said that this NPA is really aimed at older sailplanes where the only suspension element is the tyre EG K-7). With these, when the tyre bottoms, the acceleration rapidly increases to high figures. 9 g is normally used as the limit for no spiral injury. 4 g means effectively having a suspension system.

In addition we cannot discriminate between sailplanes used for training and those that are not, because this distinction does not exist in JAR22. In earlier discussions the SG decided that it could not discriminate between single and two-seaters. This element of the comment is therefore rejected by the SG.

Glider Manufacturers:

The comments are similar to those of the LBA but they propose a vertical speed of 1.7 m/s (cf. 1.77), a limit acceleration of 4 g (cf. 4.5) and a reserve energy under 22.723 of 10 % (cf. 44 %). The Chairman and Mr. Volck do not accept the commercial/weight arguments made by the glider manufacturers and do not support this proposal. Mr. Volck proposes that the SG should remind the glider manufacturers that this NPA is a compensation for the increase in the stall speed NPA (22B-83) and we do not agree with watering down the NPA.

The IEM material currently in 22.723 was always intended to remain with the revised wording of the NPA, although this is not clear in the NPA. This point was therefore accepted.