

**Comment Response Document**

**NPA 22C-85**

After circulation of the NPA to the Regulation Committee 5 comments were received.

Comments were received from following Committee members:

CAA Denmark  
ACG  
LBA  
CAA UK  
DCA Malta

CAA Denmark, ACG and DCA Malta agreed.

CAA UK: Reference to 181(a) should read 581(a). This was agreed and corrects a typographical error.

The removal of the surge factor needs to be compensated by a decrease in the rated weak link strength by a factor of 5/6. The Chairman said that what we are looking at in this paragraph is the strength of the aircraft not the weak link; the weak link is not specified in JAR22. The weak links required are determined by tests, and tests at Unterwössen show that 300 daN is adequate for all purposes; far below the values of  $Q_{nom}$ .

1.2 was not used as a "weak link variability factor". In addition the LBA studies have confirmed that the original cable factor of 1.2 was to address steel cables that are only used for winch tows. The 1.2  $Q_{nom}$  figure was originally used in the absence of any other data; but now that data is available.

This comment was therefore rejected.

LBA: In order to ensure that no steel cables are used for aerotowing, then, if the 1.2 factor is to be removed, the flight manual should contain this information. This was agreed, and also addresses to some extent the CAA comment. 22.1583(g) should be amended [(3) only textile ropes shall be used for aerotowing] to require this information. In addition, the words "...assuming the use of a textile rope" should be added to the NPA 22C-85 para 22.581(b).