EASA

Comment Response Tool

Title	Incorporation of generic SC and AMC CRIs in CS-25
NPA Number	NPA 2011-09

UK CAA (UK CAA, European.Affairs@caa.co.uk) has placed **2** reactions on this NPA:

NPA Page(s)	Reaction to	Reaction	Attachments
0	(general reactions)	**Page No:** 58 **Paragraph No:** CS 25.1193 Cowling and nacelle skin **Comment:** The inclusion of the reference to CS 25.1193(e)(1) in CS 25.1193(e)(3) is not clear. **Justification:** CS 25.1193(e)(3) sets standards for fire resistance, i.e. 'fireproof' or 'fire resistant'. CS 25.1193(e)(1) establishes requirements for 'burn-through', without any definition of fire resistance. Therefore (e)(1) should not be used to set fire resistant standards, without a clearer definition in (e)(1). **Proposed Text:** Delete reference to (e)(1) in CS 25.1193(e)(3).	
0	(general reactions)	**Page No:** 59 **Paragraph No:** CS 25J1193 APU compartment **Comment:** The new rule refers to "external skin", whereas all APU skins should be addressed for fire resistance requirements. 25J1193(e)(1) should stand alone and not be referenced from 25J1193(e)(3). **Justification:** There appears to be some confusion between the requirements in 25J1193 (e)(1) which relates to burn through from opening or external skin in the event of fire in the APU compartment so affecting other areas of the aircraft, and 25J1193(e)(3) which is intended to set standards for fire resistance of the APU compartment skins. 25J1193(e)(3) only refers to "external skin" whereas this section should address all APU compartment skins. **Proposed Text:** Keep paragraph 25J251193(e)(1) as existing requirement. Replace paragraph 25J1193(e)(3) with the	

		following text: “Have APU compartment skins in areas subject to flame if a fire starts in an APU fire zone, complying with the following: (i) For in-flight operations these skins must be fireproof (ii) For ground operations, these skins must be fireproof where skin burn through would affect critical areas of the aeroplane and must be fire resistant in the remaining portions “	

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