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Title	Integrated Modular Avionics — Phase
NPA Number	NPA 2017-11

UK CAA (European.Affairs@caa.co.uk) has placed **4** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
22	3. Proposed amendments - 3.1. CS-ETSO - SUBPART A-GENERAL	8 - 11	<p>Page No: 9</p> <p>Paragraph No: 2.3, 2nd paragraph</p> <p>Comment: EASA-SWCEH-001 applies to all forms of complex AEH, including ASICs and PLDs therefore we recommend that the second paragraph of 2.3 is amended to remove the word "other".</p> <p>Justification: Clarity of guidance</p> <p>Proposed Text: Amend to read as follows:</p> <p>"Supplemental guidance material for all airborne electronic hardware..."</p>	
23	3. Proposed amendments - 3.1. CS-ETSO - SUBPART A-GENERAL	8 - 11	<p>Page No: 9</p> <p>Paragraph No: 2.4, 3rd paragraph</p> <p>Comment: It is questioned how the assumptions related to failure conditions will be validated and by whom.</p> <p>Justification: Clarity of guidance</p>	
24	3. Proposed amendments - 3.1. CS-ETSO - ETSO-2C516	14 - 21	<p>Page No: 18</p> <p>Paragraph No: 3.1.1.2.2(c), Objective 4.3.1.a</p> <p>Comment: With reference to the software development guidance, we believe it is equally important to demonstrate the absence of unintended functionality to the degree indicated by the development assurance level.</p> <p>Justification: Clarity of guidance</p> <p>Proposed Text: Amend to read as follows:</p> <p>'Demonstrate that each application performs its intended function, IDAL C to A has no unintended functionality and satisfies the related....'</p>	
25	3. Proposed amendments - 3.1. AMC-20-170 - 5. Additional recommendations for IMA system certification	42 - 45	<p>Page No: 44</p> <p>Paragraph No: 5.6</p> <p>Comment: We believe it might help industry if some guidance on either the applicable cyber security standards or the required objectives associated with cyber security was provided as this will allow them to better focus their design, testing and ongoing</p>	

management of the system.

Justification: Clarity of guidance.