

112515

BAE SYSTEMS

DEPT. OF TRANSPORTATION
DOCKETS

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Docket Management System,
U.S. Department of Transportation,
Room Plaza 401,
400 Seventh Street, SW,
Washington, DC 20590-0001

00 SEP 29 PM 1:10

27 September 2000

Your ref: Docket number 2000-7587-5
Our ref: NPRM 00-08 / 5

Dear Sir,

NPRM 00-08 – Noise Certification standards for subsonic jet airplanes and subsonic transport category large airplanes : proposed rule

We have circulated the above NPRM for comment and have received the following:

From C M Bickerstaff, Capability Manager - Environment

1/ On page 42800 regarding the proposed A36.5.2.5 (c) requirement re airplane centre of gravity. We already report centre of gravity in the FM, but note that we just state for takeoff 'with ... mid c.g.' and for landing approach 'with ... forward c.g.' We hope this would continue to be sufficient and no more greater detail required.

2/ On page 42805 and the noise certificates para that "...invites comments on the extent of any problems encountered due to the absence of noise compliance substantiation when the AFM is not on board the airplane." We have received occasional queries from BAC 1-11 operators who have had difficulties with certain Airport Authorities, when approved noise data has not been available. In the absence of a noise certificate, the AFM is the only Authority approved manufacturer's document that is, or may be, available to provide substantiation of the noise levels. If the FM is not necessarily carried on board then the FAA should be encouraged to issue noise certificates.

3/ On page 42832 and B36.7 (c) Approach reference procedure - (5) states that 'the most critical configuration must be used; this configuration is defined as that which produces the highest noise level ...', but already landing approach certification is done at a range of aircraft configurations in case needed by specific airports.

4/ On page 42832 and B36.8 Noise Certification Test Procedures - (e) for approach refers to approach glide path angle of 3 degree (+/- 0.5 deg) and does not allow for designs for steeper approaches, despite these already being in use in specific airports. If an aircraft was now designed to specifically steeper approach and was not capable of the 3 degree approach it might be uncertifiable or difficult to certify for noise purposes.

Airbus UK New Filton House Filton Bristol BS99 7AR United Kingdom
Telephone +44 (0)117 969 3831 Facsimile +44 (0)117 936 2828 Telex 44163
Direct Telephone +44 (0)117 936 Direct Facsimile +44 (0)117 936

Airbus UK Limited Registered in England & Wales No 3468788
Registered Office New Filton House Filton Bristol BS99 7AR



I hope these comments will be of use and if we have any further thoughts on the matter they will be forwarded. Please find enclosed two copies of these comments enclosed as requested.

Sent on behalf of R A Holliday, Chief Airworthiness Engineer

Yours faithfully
For and on behalf of
AIRBUS UK LTD



R G Parrock
Airworthiness

Airbus UK New Filton House Filton Bristol BS99 7AR United Kingdom
Telephone +44 (0)117 969 3831 Facsimile +44 (0)117 936 2828 Telex 44163
Direct Telephone +44 (0)117 936 Direct Facsimile +44 (0)117 936

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