

FAA Non-Significant Standards Differences

Amendment Pair: 14 CFR Part 25 Amendment 25-117
CS-25 Amendment 0

Background:

This non-SSD list was developed from the Amendment 25-87 non-SRD list, with changes as required to account for the later FAR/JAR/CS amendments. An itemized assessment of the effect of later FAR/JAR/CS amendments is documented separately.

General Comments and Assumptions:

This following list of non-SSD regulations which require direct FAR compliance is based on the FAR/CS 25 Amendment pair noted in the header. This non-SSD list combined with the SSD list together define the regulatory differences that must be accounted for in the validation.

The following guidelines were used to limit the identification of differences to those that had a particular bearing on the standards for type certification of turbopropeller and turbojet powered transport category airplanes:

1. There are a number of standard editorial differences between CS and FAR, such as reference to “Administrator” in FAR vs. “Authorities” in CS, and differences in spelling. These differences were not considered regulatory differences, unless they had a particular bearing on the standards for type certification.
2. CS 25 does not provide standards for reciprocating-powered airplanes, skiplanes, amphibians, flying boats, or airplanes with standby rocket engines. Differences concerning standards for those airplanes are not reflected in this list.
3. Various paragraphs of CS-25 refer to AMC’s. Regulations that are otherwise identical were not addressed in the regulatory differences comparison that produced this list, as this study only addressed regulatory differences, and did not address differences in advisory material. Differences in interpretive/advisory material will be addressed with separate Validation Items (VI), if needed.

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FAR Sections	Remarks
Subpart A	
25.2	CS does not specify any retroactive requirements
Subpart B	
Subpart C	
25.305(a)	Compliance with CS 25.683(b) and (c) may result in a non-compliance with FAR 25.305(a). FAR 25.305(a) requires that for any load up to limit load, deformation must not interfere with safe operation.
25.305(e)	No corresponding CS
25.305(f)	No corresponding CS
25.571(a)	In (a)(3), FAA includes requirements for certain inspection thresholds to be included in instructions for continued airworthiness.
Subpart D	
25.619	Additional CS reservation to seek “other appropriate measures” may result in FAR non-compliance.
25.729(b)	CS allows no locks if not hazardous, FAR does not.
25.785(h)	In (h)(1) adjacent flight attendant seat requirement extended to type B doors in FAR.
25.785(g)	FAR includes requirement for single point release, and accessibility of controls when seated and strapped in. FAR also requires means to secure restraint system when not in use.
25.791(d)	Required locations of placard differ FAR/CS.
25.803(c)	FAR refers to Appendix J for emergency evacuation test criteria, considered requirements when compliance with 25.803 is shown by actual test. A combination of test and analysis may be used for showing compliance if accepted by the FAA. Differences exist between the criteria contained in Appendix J of the FAR and Appendix J of the CS.
25.809(h)	Specific to FAR (tailcone exit).
Subpart E	
25.901(b)	CS references CS E20 (d) and (e) vs. FAR reference to FAR Part 33.

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FAR Sections	Remarks
25.903(a)	FAR includes reference to FAR 33.78 for rain and hail ingestion. CS references CS E vs. FAR reference to FAR Part 33.
25.997(d)	FAR compliance must be based on installed configuration; CS does not apply to strainers or filters already approved under CS-E
25.1091(e)	CS references CS E vs. FAR reference to FAR Part 33.
25.1103(a)	CS does not contain the induction system drainage requirements of FAR 25.1103(a). While this section applies primarily to reciprocating engine installations, it does apply to turbine APU installations.
25.1103(e),(f)	CS does not include FAR 25.1103 (e) and (f) APU induction system fireproofing requirements.
25.1141(f)	In (f)(2) CS applicability limited to valves essential to safe operation of the airplane.
25.1167	CS references CS E vs. FAR reference to FAR Part 33.
25.1181(b)	FAR 25.1181(b) – Difference in regulatory cross references: compliance with CS 1181(b) plus CS 25.865 satisfies FAR 25.1181(b)
Subpart F	
25.1301(d)	Requires to function properly when installed. CS moved this requirement to 25.1309.
25.1303(b)	In (b)(4), by reference to section 121.305(k), FAR requires third attitude indicating system, when installed, to be independent of other attitude indicators, and operative without selection after total failure of electrical generating system.
25.1309(a)	More severe FAR requirement.
25.1415(c)	FAR requires survival equipment to be attached to the liferaft
Subpart G	
25.1581	CS 25x1591 is a specific CS requirement, that if complied with will result in FAR non-compliance. Such information, if provided in the FAA AFM, must be in an unapproved section.