

FAA Non-Significant Standards Differences

Amendment Pair: 14 CFR Part 25 Amendment 25-130
CS-25 Amendment 10

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 defines 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, ski planes, 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 C	
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.
25.785(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 only CS E20 (d) and (e) for engine installation instructions vs. FAR reference to FAR part 33 for engines and part 35 for propellers.
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.
25.905(c)	FAR 25.905(c) refers to additional requirements for the propeller blade pitch control system compared to CS 25.905(c). The CS references only CS-P 420 vs. FAR reference to FAR sections 35.21, 35.23, 35.42 and 35.43.
25.907	The CS-P contains the airplane requirements vs. FAR containing the airplane requirements in part 25
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.

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FAR Sections	Remarks
25.1103(e),(f)	CS does not include FAR 25.1103 (e) and (f) APU induction system fireproofing requirements.
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 25.1181(b) plus CS 25.865 satisfies FAR 25.1181(b)
Subpart F	
25.1301(a)(4)	FAR requires each item of installed equipment to function properly when installed, not just those whose improper functioning would reduce safety per CS 25.1309(a)(1)
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.
25.1415(c)	FAR requires survival equipment to be attached to the liferaft
Subpart G	
25.1529	CS does not include ICA availability requirements contained in the FAR. EASA IR 21A.61 allows deferred availability of certain ICA "dealing with overhaul or other forms of heavy maintenance" until after delivery, as long as they are made available prior to the scheduled task threshold. The FAR requires complete ICA prior to delivery of the first airplane or issuance of a standard certificate of airworthiness, whichever occurs later.
25.1581	CS 25.1591 is a specific EASA 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.