



THE INTERNATIONAL SOCIETY OF AIR SAFETY INVESTIGATORS

107 East Holly Avenue, Suite 11
Sterling, VA 20164-5405 USA
(703) 430-9668

Raymond Benjamin
Secretary General
International Civil Aviation Organization
999 Robert-Bourassa Boulevard
Montreal, Quebec
Canada H3C 5H7

AUG 1 1 2015

Ref: State Letter SP55/4-15/15, dated 15 May 2015

Dear Secretary General:

This is in response to ICAO State Letter SP55/4-15/15, dated 15 May 2015, inviting comments on the proposals for amendment of Annex 6, Parts I, II, and III relating to the carriage requirements of flight recorders.

The International Society of Air Safety Investigators (ISASI) agrees in principle with the proposed amendments for Annex 6, Operation of Aircraft Part II and Part III and offers "Agreement without comment". Further, regarding the proposal for the amendment of Annex 6, Paragraph 6.3.2.3 Duration (of CVRs), ISASI also offers "agreement without comment". However, ISASI offers "Disagreement with comments" regarding attachment B, amendment to Annex 6, *Operation of Aircraft*, Part I, International Commercial Air Transport –Aeroplanes, Paragraph 6.3.4.5, Combination recorders. The following comments are for consideration.

The Global Aeronautical Distress and Safety System (GADSS) concept of operations was fully aired during the February 2015 High Level Safety Conference (HLSC/15). The discussion included considerable emphasis on location of aircraft in distress and the need for performance based requirements to enable this concept to become fully operational. Transmission of flight data streamed from an aircraft via datalink satellite systems continues to evolve at an astounding pace. These developments have the potential to provide for timely safety investigation data needs as they provide the added benefits for ATM and air transport operations management. It is possible in the not so distant future that an aircraft in a distressed situation may transmit accurate position information in concert with trend analysis and malfunction data that can fulfill the immediate needs of the traditional air safety investigation. It is possible that improvements in datalink technology may overtake and make redundant the need for automatic deployable flight recorder as part of the GADSS concept.

The proposals for the amendment of Annex 6, Paragraph 6.3.4.5 may be premature in light of emerging datalink technology. Future ADFR equipage worldwide on every commercial air transport aeroplane is a massive undertaking of long term that has the negative potential to divert investment from the ultimate goals of event detection, triggering criteria and data



THE INTERNATIONAL SOCIETY OF AIR SAFETY INVESTIGATORS

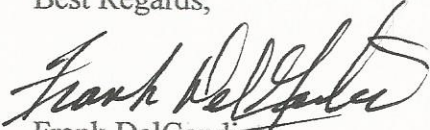
107 East Holly Avenue, Suite 11
Sterling, VA 20164-5405 USA
(703) 430-9668

streaming. It is notable that Paragraph 6.3.4.5.5 offers opportunity for equipment variations. Perhaps it is more practical and economical to allow for the aviation industry to develop the event detection and triggering criteria system. That emerging technology may overcome possible needs to provide upgraded flight recorder capabilities.

With the rapid development of communications and navigation capabilities - upgraded flight recorder standards may be performance based, rather than tied to a specific ADRF requirement as proposed in ATTACHMENT B, Annex 6, Part 1 Commercial Transport Aeroplanes. ISASI suggests that the Air Navigation Commission direct the Air Navigation Bureau to conduct further continuing study involving industry and regulators to evaluate and monitor the technological developments of GADSS and the need for a prescriptive mandate for automatic deployment flight recorders.

Please find attached the completed attachment F to SP55/4-15/15.

Best Regards,



Frank DelGaudio

President, ISASI

Attachment

ATTACHMENT F to State letter SP 55/4-15/15

**RESPONSE FORM TO BE COMPLETED AND RETURNED TO ICAO TOGETHER
WITH ANY COMMENTS YOU MAY HAVE ON THE PROPOSED AMENDMENTS**


To: The Secretary General
International Civil Aviation Organization
999 University Street
Montréal, Quebec
Canada, H3C 5H7

(State) International Society of Air Safety Investigators

Please make a checkmark (✓) against one option for each amendment. If you choose options “agreement with comments” or “disagreement with comments”, **please provide your comments on separate sheets.**

	<i>Agreement without comments</i>	<i>Agreement with comments*</i>	<i>Disagreement without comments</i>	<i>Disagreement with comments</i>	<i>No position</i>
Amendment to Annex 6 — <i>Operation of Aircraft</i> , Part I (Attachment B refers)				X	
Amendment to Annex 6 — <i>Operation of Aircraft</i> , Part II (Attachment C refers)	X				
Amendment to Annex 6 — <i>Operation of Aircraft</i> , Part III (Attachment D refers)	X				

*“Agreement with comments” indicates that your State or organization agrees with the intent and overall thrust of the amendment proposal; the comments themselves may include, as necessary, your reservations concerning certain parts of the proposal and/or offer an alternative proposal in this regard.

Signature:  Date: AUG 1 1 2015

— END —