

# AGING TRANSPORT SYSTEMS RULEMAKING ADVISORY COMMITTEE

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**OFFICE OF THE CHAIRMAN  
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July 16, 2004

Mr. Nicholas A. Sabatini  
Associate Administrator  
Regulation and Certification AVR-1  
Federal Aviation Administration  
Room 1000 West  
800 Independence Ave. SW  
Washington, DC 20591

Dear Mr. Sabatini:

At the ATSRAC meeting last week, the Committee discussed in depth two recommendations brought forward from the Electrical Wiring Interconnection Systems (EWIS) Research and Development (R&D) Technology Transfer Harmonization Working Group (HWG) #12.

HWG12 recognized that the recommended changes to Part 25 made previously by ATSRAC would cover only new Type Certificates and major Supplemental Type Certificates (STC) as governed by the Changed Product Rule. The HWG felt that it was important for the new knowledge gained on EWIS to be considered on all new STC projects, to avoid repeating past design and installation problems. Additionally, a member from a European regulator felt that many certifying engineers (US and European) needed additional training in the new criteria proposed by ATSRAC. The full ATSRAC agreed with these points and thus makes the following recommendation:

*There is a need to inform ACOs how to include the results of ATSRAC findings in their evaluations. A checklist of encouraged practices is recommended.*

Additionally, the HWG discovered that white wire (the most common color) is typically submitted for qualification testing to a specification. After the white wire has been shown to meet the specification, the wire manufacturer may add pigments and other additives as "minor changes" to the insulation. However, testing performed by several HWG12 members showed that certain colors of qualified wire can exhibit reduced properties as compared to the white wire that was tested. Therefore, ATSRAC recommends that the FAA:

*Request wiring qualification organizations to investigate whether pigments and other additives can affect wiring mechanical, electrical and flammability properties.*

Thank you for your consideration of these recommendations.

Sincerely,

Kent V. Hollinger  
ATSRAC Chairman

Cc: James Ballough  
Brenda Courtney

John Hickey  
Charles Huber

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