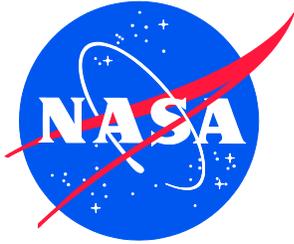


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Certification Gap Analysis

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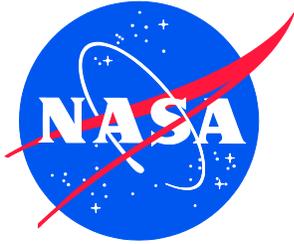
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EXECUTIVE SUMMARY

None of the Federal Aviation Regulations envisioned electric propulsion when the regulations were promulgated. Further, most of the technology for spark ignition reciprocating engines had been innovated decades ago, so that subsequent certifications of newer reciprocating engines had an heritage, along with legacy means of compliance so that certification was clear-cut.

Recent technology innovations in vehicle concepts and the technology that support the vehicles have pushed the limits of their ability to be certified. The FAA's recent response to that challenge with its regulation by objective, supported by the update of FAR 23 to amendment 23-64 show a remarkable intent to adapt to the technology challenge. In particular, the ASTM committees to develop standards that support these standards are laudable.

Accordingly, there can now be made a clear mapping between the regulations and certification criteria and the X-57 Scalable Convergent Electric Propulsion Technology and Operations Research (SCEPTOR) program. The results of planning and tests from the program is able to address still-open questions and challenges in the development of the means of compliance to the ASTM standards, as well as gaps between the existing regulations and the new vehicles that are pushing innovative technologies.

This report describes a generic method for addressing any new technology to its associated set of regulations and certification criteria. The result is a framework under which a detailed assessment can be conducted.

Using just such a framework, the report maps the detailed updated regulations and evolving ASTM standards to the particular technology planning and tests.

As a result, a roadmap of NASA technology is documented that shows clear transfer of technology data to industry (standards developers, as well as technology developers) and the FAA regulatory policy and certification staff upon whom certification and policy will be data-driven.

Future work will include the development of new standards and means of compliance for new insights from the NASA flight project. To validate the approach, a new NASA vehicle concept should be examined for its certification issues. It is conceivable that the approach and framework can be used to inform the decision-making by NASA for new vehicle concepts.

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1. Introduction

None of the Federal Aviation Regulations envisioned electric propulsion when the regulations were promulgated. Further, most of the technology for spark ignition reciprocating engines had been innovated decades ago, so that subsequent certifications of newer reciprocating engines had an heritage, along with legacy means of compliance so that certification was clear-cut.

This report describes a generic method for addressing any new technology to its associated set of regulations and certification criteria, and assessing it with respect to a generic electric propulsion vehicle. The result is a framework under which a detailed assessment can be conducted for particular vehicle configurations.

The report then describes some of the key characteristics of the X-57 Maxwell Scalable Convergent Electric Propulsion Technology and Operations Research (SCEPTOR). In particular, the approach of taking a Tecnam P2006T aircraft, and replacing the wing and twin Rotax R912 spark ignition reciprocating engines with a high-aspect ratio wing with leading-edge distributed electric propulsion motors for high-lift climb and descent, as well as two electric propulsion units for cruise flight.

Using the generic framework and applying it to the X-57 Maxwell SCEPTOR, as an example vehicle, the report maps the detailed updated regulations and evolving ASTM standards to the particular technology planning and tests of the X-57.

As a result, a roadmap of NASA technology is documented that shows clear transfer of technology data to industry (standards developers, as well as technology developers) and the FAA regulatory policy and certification staff upon whom certification and policy will be data-driven.

Accordingly, there can now be made a clear mapping between the regulations and certification criteria and the X-57 SCEPTOR program. The results of planning and tests from the program is able to address still-open questions and challenges in the development of the means of compliance to the ASTM standards, as well as gaps between the existing regulations and the new vehicles that are pushing innovative technologies.

2. An Approach to Identify Areas to Focus Electric Propulsion Certification

This report describes the initial assessment of aircraft procedures for emerging technologies. The objective is to identify gaps that may exist due to emerging technologies in both new certification rules and existing standards used as a means of compliance to these rules for Normal Category Aircraft.

There are three tasks associated with this assessment. The first is a certification basis review. The second is the evaluation of NASA activities relevant to certification gaps. The final is the coordination between NASA, the regulators and the standards bodies.

2.1. Certification Basis Review

The approach to the certification basis review is done in three parts. First identify the appropriate engineering certification regulations for the advanced vehicle concept. Next, identify the technology innovations. Finally, select the particular vehicle concept and regulatory environment.

2.1.1. Identify the appropriate engineering certification regulations

This involves capturing the relevant aircraft and propulsion certification regulations, as well as the associated Aircraft Flight Manual and-or the Pilot Operating Handbook (while operational, these later documents contain limitations based on the engineering certification of the aircraft), and with some portions of the operational certification regulations. Figure 1 shows a list of potential concept vehicles and potential associated regulation groups.

Figure 1, Identification of Appropriate Certification-Regulations for Advanced Concept Vehicles

<i>ID the Appropriate Engineering Cert Reg's for the Advanced Vehicle</i>	
Transport: FAR 25, 33, Concept AFM, FAR 121	
General Aviation: FAR 23, 33, POH, FAR 91	
Vertical Flight: FAR 27 or 29, 33, POH	
Supersonic: FAR 91.817, ICAO CAEP	
Or Combinations...	

2.1.2. Evaluation of NASA Activities Relevant to Certification Gaps

This involves capturing the relevant technology innovations to be demonstrated, as well as key vehicle concepts. For example, a vehicle concept may focus on a large, transport-category aircraft that leverages boundary layer injection. Associated with that technology is hybridized powerplants and integrated turbine engines. An electric cruise propulsion vehicle may focus on electric propulsion systems and battery management systems, while concurrently

demonstrating high-lift distributed electric propulsion. Other examples are also shown and summarized in Figure 2.

Figure 2, Technology Innovation and Vehicle Concepts

ID the Technology Innovations

Hybridized Powerplants, Boundary Layer Injection, Integrated Turbine Engine

High-Lift Distributed Electric Propulsion, Electric Cruise Propulsion, High-Power Electric Management and Distribution, Battery Management System

On-Demand, Urban Air Mobility, "Autonomous" Operations (Automation of Automated Systems)

Low-Boom Overland Operations, Ground Noise ~60 dB(A), Enhanced Flight Vision System

The image is a collage of four aircraft concepts. At the top right is a conventional jet aircraft with a blue and white livery. Below it is a distributed electric propulsion aircraft with multiple propellers along the wingspan. To the left of that is a quadcopter drone with green propellers. At the bottom right is a low-boom supersonic aircraft with a long, thin nose and a delta-shaped wing.

2.1.3. Selecting a Vehicle Concept and Technology

The third and final part is to select a particular problem space that focuses on a vehicle concept and technology, and focuses on the appropriate engineering certification and standards. Figure 3 shows the example of focusing on electric propulsion for a fixed wing advanced concept vehicle, which further focuses on 14 CFR 23, 33 and 35, as well as appropriate ASTM standards and working documents.

Figure 3, Selecting a Particular Technology, Vehicle Concept and the Regulations and Standards



Once the problem space is defined for electric propulsion, then begins the review the current regulations that apply to small aircraft, as well as the Means of Compliance (MOC) by both FAA Advisory Circulars and Standards. A significant body of new standards are being developed by ASTM in its committees F44 and F39, based on the FAA approach of performance-based regulation, epitomized in 14 CFR 23, Amendments 62 through 64. A considerable legacy of standards are also found in SAE, RTCA and other organizations, as well.

This review of the current regulations are examined with respect to to the new concept vehicle and new technology, in this case to identify areas to focus electric propulsion certification, and to uncover elements of the applicable Federal Aviation Regulations (FAR) that suggest a need of tailoring or wholesale revision.

The approach taken to infer the need for tailoring or revision is to integrate the regulations with the vehicle concept using the system technology demonstration phases. This allows insights into the particular phase of the system technology demonstration phase, and its applicable regulation or MOC standard. This is shown in Figure 4.

At each intersection shown in Figure 4, an assessment of the effect of the advanced technology insight is conducted on the regulation and certification. The purpose is to assess the

appropriateness of the regulatory criteria or conditions on the technology. This establishes a simple means of asserting that the regulation-certification is unchanged, needs tailoring or needs revision.

Figure 4, Integrating Regulations with Vehicle Concepts by System Technology Phase

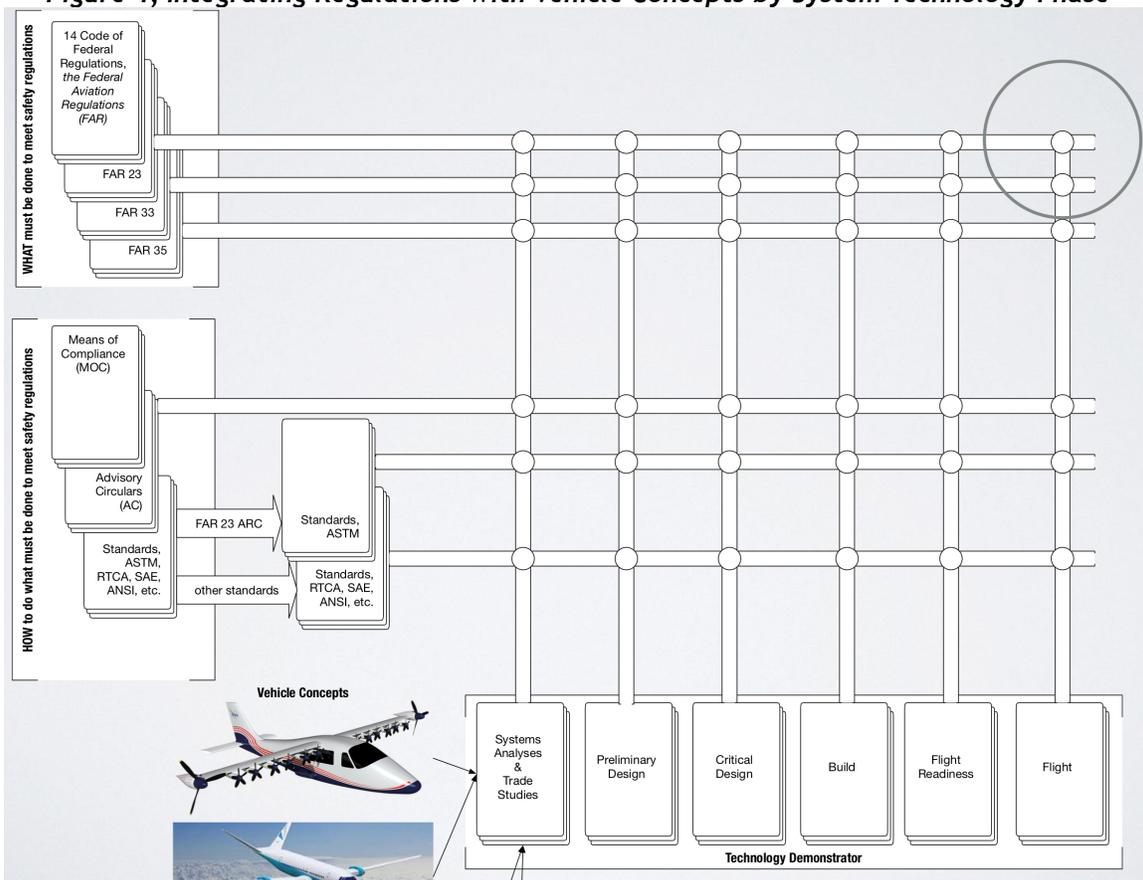
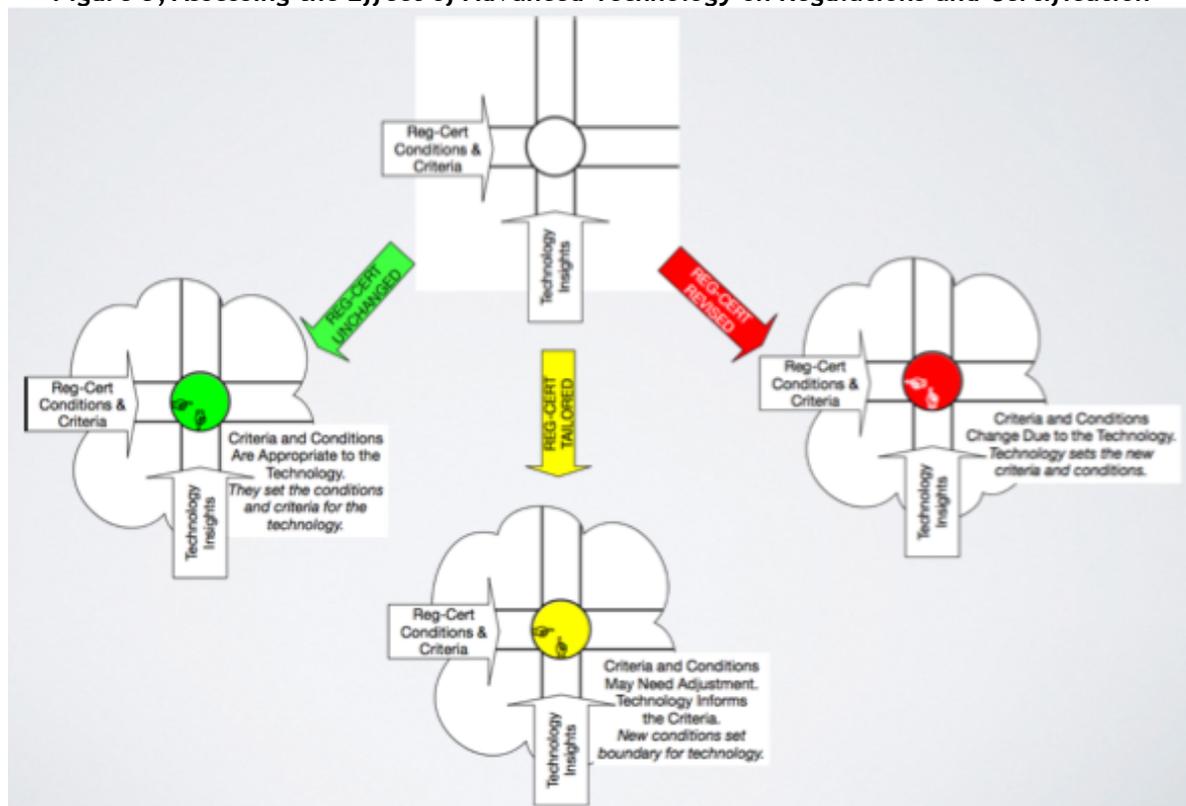


Figure 5 shows a hypothetical decomposition of an intersection and a caricature of the decision process. In one case, the criteria and conditions of the regulation-certification are appropriate to the technology, and sets the conditions and criteria for the technology. The regulation-certification, in this case, is unchanged.

The next case, the criteria and conditions may need adjustments, and the technology informs the criteria. The new conditions set the boundary for the technology, and, thus, the regulation-certification is tailored for the technology.

Finally, the criteria and conditions change due to the technology, and the technology sets new criteria and conditions. The regulation-certification need revision.

Figure 5, Assessing the Effect of Advanced Technology on Regulations and Certification



After conducting an evaluation of 14 CFR 23, Airworthiness Standards: Normal Category Airplanes¹, 33, Airworthiness Standards: Aircraft Engines², and 35 Airworthiness Standards: Propellers³, for a fixed-wing electric propulsion concept vehicle, most of the regulations were found to be appropriate for electric propulsion. Of the 122 sections reviewed in FAR 35, 33 and 23, 8 were found to need revision and 20 would need tailoring for the electric propulsion technology. This provides some confidence that the regulatory process is robust in the presence of the new technology.

2.2. Evaluation of NASA activities relevant to certification gaps

This report focuses on the assessment of the NASA vehicle concept of the X-57 SCEPTOR Distributed Electric Propulsion technology and its ability to affect the relevant certification and regulatory environment. In the process, this report assesses the certification gaps.

¹ 14 CFR 23, Amendment 23-64, Dated 30 Aug 2017 (<https://www.ecfr.gov/cgi-bin/retrieveECFR?pitd=20170830&n=pt14.1.23>)

² 14 CFR 33, General, Design and Reciprocating Aircraft Engines, Dated 3 October 2018, (<https://www.ecfr.gov/cgi-bin/retrieveECFR?&n=pt14.1.33>)

³ 14 CFR 35, Dated 3 October 2018, (<https://www.ecfr.gov/cgi-bin/retrieveECFR?&n=pt14.1.35>)

2.3. Coordination between NASA, the regulators and the standards bodies

The third task is to ensure that the vehicle concept and technology has the ability to be reviewed and understood by the regulators and standards bodies. While traditional engineering certification processes are proscriptive in nature (with explicit pass-fail criteria that must be demonstrated by the applicant to the certification office), the recent vehicle concepts and associated technologies have stretched this traditional model to its limits. Accordingly, a number of initiatives, which formed a new organization within the FAA certification service (AIR-600, Policy and Innovation Division, in the Aircraft Certification Service), within which new technology vehicles are being assessed for their ability to be certified using special conditions. Further, rather than an applicant entering the certification process with all documentation completed and ready to pass all of the criteria, this new service encourages new vehicle developers to enter discussions, so that the FAA better understands the technology, and can offer the new vehicle developer a potential path forward when the developer is ready to begin certification.

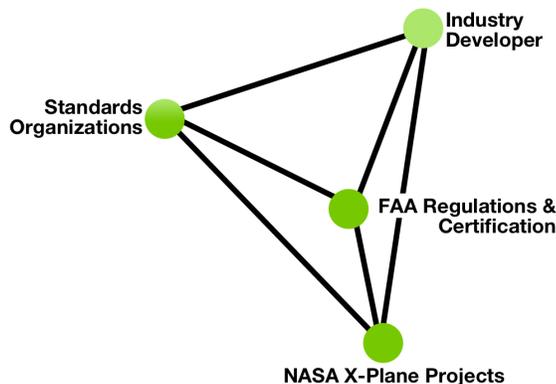
A significant portion of any certification program is a solid knowledge of the means of compliance (MOC) to each paragraph within the regulations. These MOCs are traditionally done by FAA Advisory Circulars. However, a number of MOC are better done by industry-accepted standards. Aviation standards organizations such as ASTM, RTCA, SAE (and others) build their standards, typically, through consensus of industry and Government technical specialists gathering to develop their standards.

Of particular note for general aviation is that the ASTM has built the Committee F44 on General Aviation Aircraft, and Committee F39 on Aircraft Systems. These committees are actively contributing to the standards body of knowledge on electric propulsion, in particular.

NASA involvement with the regulators and standards bodies is openly encouraged, and forms a unique ability to ensure contribution of NASA technology to the industry.

As a result, the X-57 SCEPTOR program becomes an equal contributor to the industry developer, the standards organization and the FAA regulator and certifier, as illustrated in Figure 6.

Figure 6, NASA's Role in Emerging Technology Environments



3. Overview of the X-57 Project

Based on the summary assessment of the regulations with respect to electric propulsion, an assessment was conducted with particular focus on the NASA Scalable Convergent Electric Propulsion Technology and Operations Research (SCEPTOR) X-57 project.

The SCEPTOR X-57 project addresses a NASA Aeronautics Research Mission Directorate (ARMD) goal to enable technologies that reduce fuel burn and emissions across the U.S. aviation fleet. System studies, identified in the SCEPTOR X-57 “Maxwell” Objectives and Requirements Document (ORD)⁴, have shown that extremely high coupling between the aerodynamics, propulsion, control, structure, and acoustics through electric propulsion offers the most aggressive method of accomplishing a reduced fuel burn and emissions goal. The project will validate these system studies through the flight test of a human piloted all-electric GA aircraft. Performance of the conventionally powered baseline GA aircraft is compared to that of the all-electric aircraft in order to validate the performance gain. The objectives of the SCEPTOR project are shown in Table 1.

⁴ SCEPTOR X-57 Maxwell Objectives and Requirements Document (ORD), ORD-CEPT-002, Release A, 8 January 2018.

Table 1, Flight and Complex Distributed Electric Propulsion (DEP) Objectives (from ORD)

Objective Number	Objectives	Precedence	Performance Measure
OBJ-1	Achieve at least a 3.0x lower energy usage compared to baseline General Aviation (GA) aircraft at high speed cruise.	Primary	Cruise energy per nm resulting from the product of aerodynamic, propulsive and structural efficiencies. Measured by collecting air data for true airspeed, GPS for distance, and power usage of the battery system.
OBJ-2	Achieve at least a 1.2x lower energy usage compared to electrified General Aviation (GA) aircraft at high speed cruise.	Secondary	Cruise energy per nm resulting from the product of aerodynamic, propulsive and structural efficiencies. Measured by collecting air data for true airspeed, GPS for distance, and power usage of the battery system.
OBJ-3	Raise the TRL from 5 to 6 of a complex, integrated DEP system on a manned aircraft	Primary	Min Success: Flight with a complex, integrated DEP system containing at least 8 motors operating at a total power level of at least 60kW during a power-idle descent Full Success: Level flight with a complex, integrated DEP system active down to at least 58 KCAS
OBJ-4	Demonstrate low-speed handling qualities, landing profile, and takeoff profile using a complex DEP system	Primary	Min Success: Cooper-Harper rating of 6 Full Success: Cooper-Harper rating of 4
OBJ-5	Demonstrate a means of compliance for certification of DEP technologies	Primary	Min Success: Publicly-available presentation or report that describes the approach that was used to address NASA airworthiness standards related to the DEP system Full Success: Incorporation of at least one NASA-developed DEP-related airworthiness procedure in a consensus standard that is accepted as a means of compliance to 14 CFR Part 23 or Part 33 (e.g., ASTM F44, ASTM F39, etc.)
OBJ-6	Generate a reference acoustic signature of a DEP configuration	Secondary	Min Success: Build an acoustic model based on collected reference data Full Success: Conduct acoustic signature characterizations acceptable to 14 CFR Part 36, Appendix G

The SCEPTOR X-57 project intends to modify an existing GA aircraft. This provides for a “re-wing” of the aircraft utilizing a wing optimally designed for electric propulsion at cruise, while reducing the risk and cost associated with a new aircraft design. Additionally, this allows for a direct comparison between performance of the GA baseline aircraft and the X-57 aircraft. The project objectives may be met with the selection of various GA aircraft that operate in the desired flight envelope and are capable of high speed cruise; a representative geometry reflecting a re-winged Tecnam P2006T is shown in Figure 6. Representative performance data are shown in Table 2. (These data may change as the vehicle configuration evolves.)

Figure 7, A Representation of the X-57 SCEPTOR as a Re-Winged Tecnam P2006T



Table 2, Electrified GA Aircraft Performance Characteristics of the X-57 SCEPTOR

Performance Characteristic	Value
Wing Area	67 sq. ft.
Wing Aspect Ratio	15
Cruise Motors (no. @ power each)	2 @ 45kW (60 kW peak)
High Lift Motors (no. @ power each)	12 @ 10kW
Aircraft Weight	3000 lb
Battery Weight	800 lb
Cruise Altitude	9000 ft
Ceiling	15000 ft
Cruise L/D	14
Cruise Speed	152 KTAS
Stall Speed	58 KCAS
Flight Time	30 min

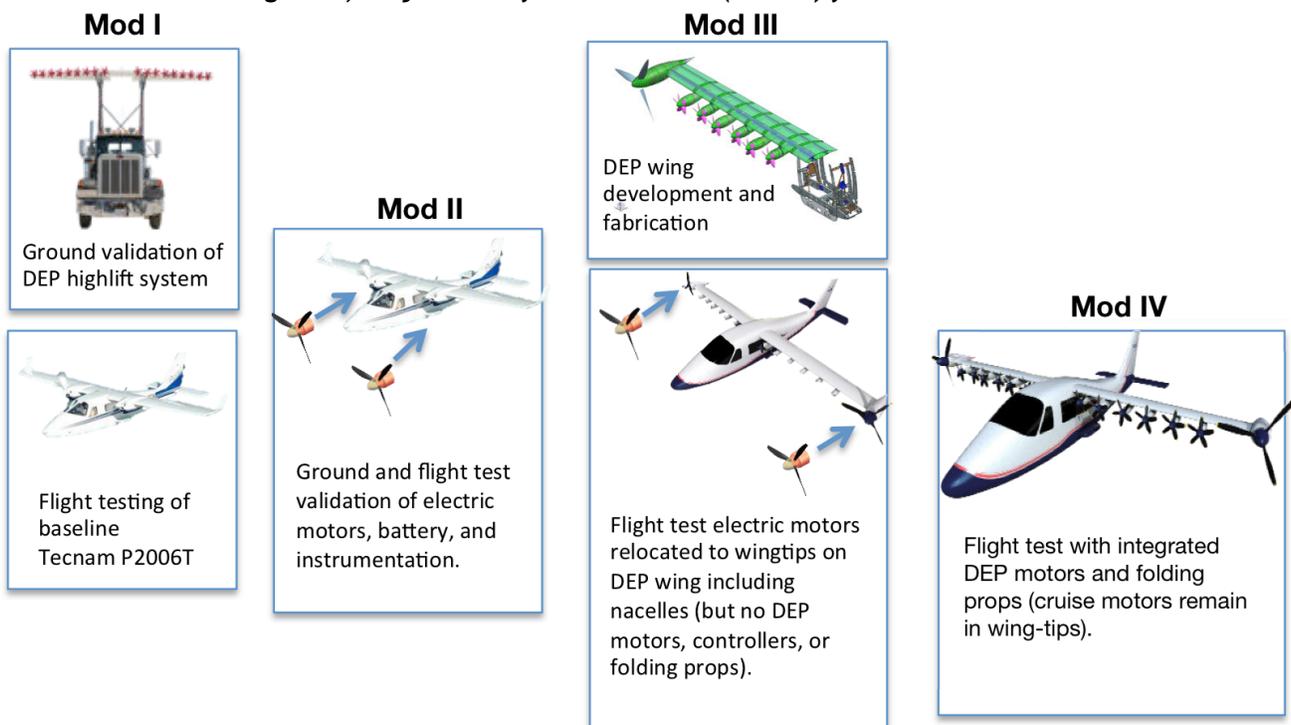
The X-57 aircraft is a human-rated, human-piloted aircraft with a conventional mechanical flight control system. A digital flight control system is not required for aircraft control, and therefore is considered an unnecessary complexity. However, a level of fault-tolerant digital control is required for operation of the electric propulsion system.

The SCEPTOR X-57 project's development approach incorporates conventional design practices, a build-up testing approach, and model validation. The development plan ensures an advanced understanding of the electrical power system, motors, wing structure, and flight controls, and demonstrates NASA airworthiness of the X-57 aircraft prior to flight.

The X-57 aircraft maintains the base GA aircraft system fuselage, empennage, landing gear, and control system for pitch and yaw. The wing structure, and consequently the roll control system and high-lift system, are a new design. The new wing structure is primarily of carbon-fiber construction. The wing provides ailerons for roll control and flaps for high-lift augmentation, plus nacelles for the wing tip and High Lift motors, and routing accommodations for the electrical power system. The wing shall be designed according to G-7123.1-001 Aircraft Structural Safety of Flight Guidelines.

The SCEPTOR X-57 project is divided into 4 primary developmental phases, referred to as modifications, and abbreviated as Mod I, II, III, and IV. Each modification results in an incremental build-up in system complexity. Mod I includes build-up of a ground test version of the primary electrical propulsion system. Additionally, flight data for simulation validation is collected from a rental aircraft during Mod I. Mod II involves the integration and flight test of the electrical propulsion system and is used for flight validation of the new propulsion system. Mod III involves development and integration of the new wing design with the propulsion system installed on the wing-tips. Mod IV adds the High Lift system, which restores the original low speed performance envelope of the aircraft. The project Mods are shown in Figure 7.

Figure 8, Project Modification Phases (“Mod”) for SCEPTOR X-57



There are four flight phases to the X-57 flight testing, correlating to the three project modifications, categorized as Mod I, Mod II, Mod III, and Mod IV.

Mod I consists of test flights on a rental aircraft to develop pilot familiarization and collect flight data for simulation validation. These data support energy consumption with a representative reciprocating engine; pilot familiarization of the basic aircraft controls that remain unchanged when proceeding to Mod II; and collecting aero-model, stability and control, and flight characteristics for simulator development.

Mod II is flight testing of the base GA aircraft with the electric motor(s). The focus of Mod II is (1) to develop pilot proficiency in the operation of the electric aircraft, and (2) establish baseline performance of the aircraft with electric motors. The flight test for Mod II includes

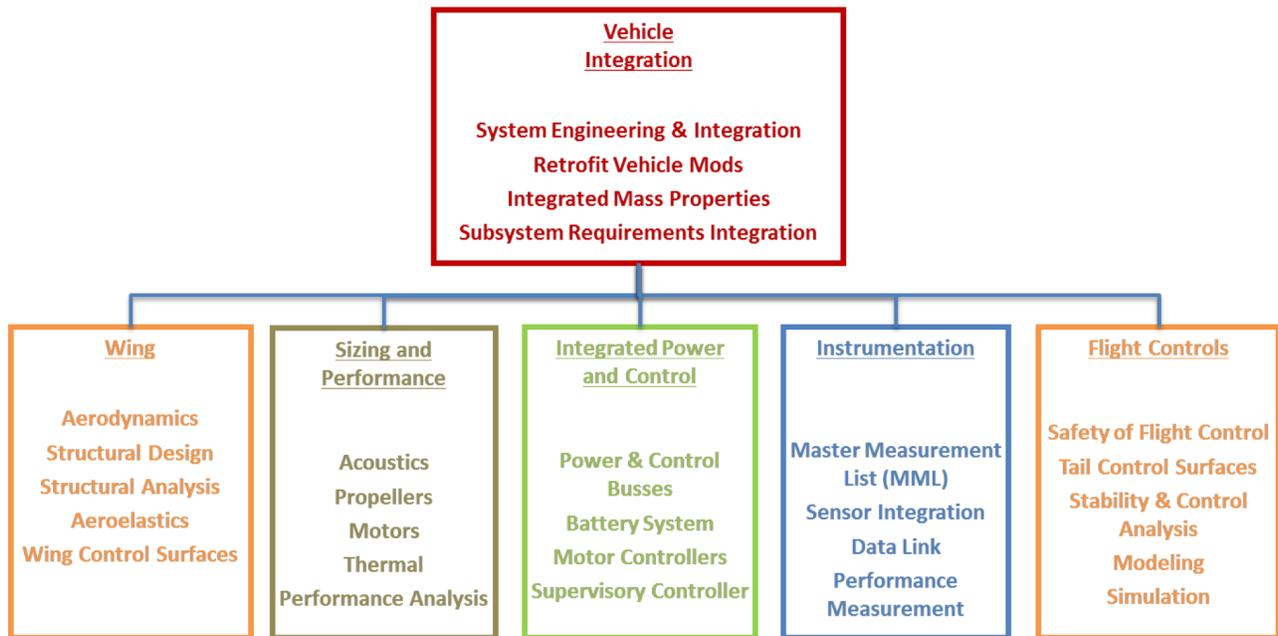
energy consumption measurements, and validation of the simulator model for operation and failure states of the electric motors.

Mod III ground and flight testing begins following integration of the new wing and wing- tip cruise motors. Ground testing including Ground Vibration Tests (GVT) conducted to validate system models prior to flight test. This Mod of flight testing requires envelope expansion as the vehicle is required to establish flutter clearance and validate motor-out performance.

Mod IV ground and flight testing follows the integration of the High Lift system and therefore expands the flight envelope accordingly. Operations of the High Lift system will occur first at altitude prior to operations during take-off and landing.

While the X-57 SCEPTOR project development is builds on progressions between each modification phase, the project structure is based on an integrated product team structure with Vehicle Integration as the integrating integrated product team, with five integrated product teams consisting of Wing, Sizing and Performance, Integrated Power and Control, Instrumentation, and Flight Controls. The disciplines and responsibilities associated with each integrated product teams is shown in Figure 8.

Figure 9, Integrated Product Team Structure of the X-57 SCEPTOR Project



Further X-57 SCEPTOR project details can be found in the ORD, as well as the six specifications: Motor and Controller Specification (SPEC-CEPT-001), Traction Battery System Specifications (SPEC-CEPT-002), Mod III/IV Wing Structural Specifications (SPEC-CEPT-003), High-Lift Motor Specification (SPEC-CEPT-004), High-Left Motor Controller (SPEC-CEPT-005), and High-Lift Propeller Specification (SPEC-CEPT-006).

There is also a public-facing document repository with technical papers, as well as the Preliminary Design Review and Critical Design Review presentations available at the NASA X-57 Technical Data Repository⁵.

4. Evaluation of the Federal Aviation Regulations and the X-57 SCEPTOR

The X-57 is not bound by the Federal Aviation Regulations, and as such does not need to go through an aircraft certification process. As a NASA experimental aircraft there is a robust body of NASA safety of flight and safety-and-mission-assurance processes and practices that it must meet in order to fly. These are complemented by a robust set of NASA program and project management practices in systems engineering with oversight by Chief Engineering organizations.

This assessment was conducted of the regulations as they might be affected by the new technology in the X-57. The purpose of which is to ensure that the technology development, as well as results and insights from simulations and tests of the X-57 during its four modification phases are available for the industry and FAA, as a resource for their decision-making. It is not to conduct a certification test plan for the X-57.

The approach was to generate a “Proposed Compliance Matrix” (PCM) that mimics a traditional test matrix. While a test matrix is not needed for the X-57, this structure provides a means by which an assessment of the current regulations can be done based on the X-57 technology development. This is a similar process to that which was described in the Introduction section of this paper. The difference is that instead of using the generic system technology demonstration phases (“systems analysis”, PDR, CDR, etc.), this assessment will focus on the four development phases of the X-57 to assess the readiness of the regulations to its new technology.

A review of the Airworthiness Standards: Normal Category Airplanes (FAR 23), Aircraft Engines (FAR 33), and Propellers (FAR 35) for their robustness to electric propulsion and distributed electric propulsion follows.

4.1. Summary of Normal Category Airplanes Regulations (FAR 23) and X-57

Installation of electric propulsion units, electrical storage systems and distributed electric propulsion were not envisioned when 14 CFR part 23 was created.

Fortunately, the Federal Aviation Administration’s (FAA) Policy and Innovation Division’s Small Airplane Standards Branch (AIR-690), in the face of increasing requests to certify new aircraft with advanced technology, began the process of adjusting its practices to better accommodate new technology in certification efforts, the FAA certification office began initiatives such as the safety continuum concept, implementation of performance based regulations, reaching out within its organization to a much broader intra-agency collaboration, and the application of

⁵ <https://www.nasa.gov/aeroresearch/X-57/technical/index.html>

risk based approach to safety analyses⁶. One of the most effective efforts that the certification service has used is an early engagement with industry (prior to application for a certificate, which is the traditional time when the industry meets with the FAA certification process). Further, the FAA certification office is continuing to re-examine the regulatory landscape, and is reviewing ways to comply with the regulations.

The FAA developed Amendment 23-64 to 14 CFR 23⁷, which reflected a move to performance based rules with a Means of Compliance (MOC) within consensus standards, which is less tied to aircraft configuration, and enables flexible requirement development. This encourages industry innovation, and breaks the cycle of rule language falling behind technology. However, advanced configurations are rapidly emerging, and it is apparent that some gaps still exist in Part 23-64. The FAA Policy and Innovation Division’s Small Airplane Standards Branch (AIR-690) established a team in mid-2017 to complete the gap analysis.

The scope of the FAA Future Aircraft Safety Team’s (FAST) gap analysis was threefold: Aircraft that use fixed wings for horizontal flight and propulsion systems for vertical flight; Aircraft that are piloted by a person onboard; and Aircraft with the ability to fly away and-or land safely after critical power and-or thrust failures not extremely improbable. The FAST was made up of specialists from the Small Airplane Standards Branch; Rotorcraft Standards Branch; and Engine Propeller Standards Branch. The FAST strategy was three-phased: Small Airplane Standards; Small Airplane and Rotorcraft; and all three Standards from the three Branches.

The FAST used a series of questions as they developed the language of their gap analysis, such as: *Does the language accommodate a performance based philosophy? Does the language address all overall aircraft configurations? Does the language address all forms of propulsion? Are all anticipated flight characteristics accommodated? Have all anticipated structural considerations been reflected? Have all levels of systems complexity and interaction been reflected? Have all crew considerations been examined? And finally: Are there significant Part 27 (Normal Category Rotorcraft⁸) considerations?*

The following sections are organized by each of the Federal Aviation Regulation 23⁹ subparts, and provide an overview of the detailed assessment shown in the “Proposed Compliance Matrix” (PCM). The ASTM MOCs¹⁰ are shown for each, along with notes, as necessary.

⁶ This description of the FAA’s initiatives are from a presentation made by the FAA at the ASTM F44 Committee meeting during the “Advanced Aircraft Technology Certification Workshop,” 23 October 2018.

⁷ 14 CFR 23, Amendment 23-64, Dated 30 Aug 2017 (<https://www.ecfr.gov/cgi-bin/retrieveECFR?pitd=20170830&n=pt14.1.23>)

⁸ Part 27 — Airworthiness Standards: Normal Category Rotorcraft, August 30, 2017, https://www.ecfr.gov/cgi-bin/text-idx?SID=d1bf1e3a146fffd61ba16f2dfa4a1e4b&pitd=20170830&tpl=/ecfrbrowse/Title14/14cfr27_main_02.tpl

⁹ 14 CFR 23, Amendment 23-64, Dated 30 Aug 2017 (<https://www.ecfr.gov/cgi-bin/retrieveECFR?pitd=20170830&n=pt14.1.23>)

¹⁰ Accepted Means of Compliance; Airworthiness Standards: Normal Category Airplanes (Federal Register, Vol. 83, No. 92/ Friday, May 11, 2018/ Rules and Regulations, Notice No. 23–18–01–NOA).

There were no issues with §23.1457 Cockpit voice recorders (CVR), §23.1459 Flight data recorders (FDR), or §23.1529 Instructions for continued airworthiness (ICA). As the X-57 is an experimental aircraft, there is no need for ICA. However, for the CVR and FDR, the mission control and data telemetry will more than accommodate any needs within the regulations.

4.1.1. Normal Category Airplanes, Subpart A, General

Revised §23.2000 with expanded applicability and definitions to account for unique powered lift characteristics. Details can be found in the PCM.

4.1.2. Normal Category Airplanes, Subpart B, Flight

Performance (§§23.2100-23.2130): Performance constitutes one of the key areas where vertical flight vehicles show their effect in FAR 23, with the incorporation of high-lift capabilities into weight and center of gravity, performance data, stall speed, takeoff performance, climb requirements, climb information, and landing. The X-57, during Mod IV, conducts its flight test of the Distributed Electric Propulsion (DEP) system that will provide significant publicly available data to the community of the DEP regarding performance, stall speed (renamed “minimum safe speed” in the FAST white paper), takeoff performance, climb and landing.

Flight Characteristics (§§23.2135-§23.2165): Flight characteristics is also heavily affected by the FAST gap analysis. Controllability; trim; stability; stall characteristics, stall warning, and spins; ground and water handling characteristics; vibration, buffeting, and high-speed characteristics; and performance and flight characteristics requirements for flight in icing conditions are all addressed, with particular focus on controllability, stall characteristics, warning and spins, having significant opportunity for data from X-57 SCEPTOR during Mod IV. However, since the X-57 SCEPTOR is based on the Tecnam P2006T, and there are restrictions from operating in known icing conditions as part of its type certificate data sheet¹¹. Accordingly, there will be no experience generated from the X-57 SCEPTOR regarding icing.

4.1.3. Normal Category Airplanes, Subpart C, Structures

For §23.2200 Structural design envelope, there were only minor edits from the FAST gap analysis to reflect the change from “stall speed” to “minimum safe speed,” as well as adding a reference to accommodate powered lift aircraft with engine-driven lifting devices. While this is typically associated with vertical flight concept vehicles, it will also be informed by the X-57 SCEPTOR.

Structural Loads (§§23.2210-23.2230): Structural loads is modestly affected by the FAST gap analysis. Some references are made to accommodate engine-driven lifting devices. As appropriate, data from the DEP Flight test during Mod IV, as well as battery installation and testing from Mod’s II and III, will be supplied to inform the regulations and ASTM MOCs.

¹¹ Type Certificate Data Sheet No. A62CE, Revision 5, Costruzioni Aeronautiche Tecnam srl, P2006T, October 17, 2017. [http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgMakeModel.nsf/0/24e12213052297b9862581bf0052286a/\\$FILE/A62CE_Rev_5.pdf](http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgMakeModel.nsf/0/24e12213052297b9862581bf0052286a/$FILE/A62CE_Rev_5.pdf)

Structural Performance (§§23.2235-23.2245): There are no changes from the FAST gap analysis for structural performance. As appropriate, data from the battery installation and testing from Mod's II and III, will be supplied to inform the regulations and ASTM MOCs.

Design (§§23.2250-23.2265): There are no changes from the FAST gap analysis for design. As appropriate, data from the battery installation and testing, as well as wing design, fabrication and testing from Mod's II and III, will be supplied to inform the regulations and ASTM MOCs.

Structural Occupant Protection (§§23.2270): There are no changes from the FAST gap analysis for emergency conditions. There is significant work established to ensure the safety of the flight research pilot for the X-57 for both structural occupant protection, as well as emergency conditions as part of the flight research activities in Mod's II, III and IV, and these will be supplied to inform the regulations and ASTM MOCs.

4.1.4. Normal Category Airplanes, Subpart D, Design & Construction

For §§23.2300-23.2310 (Flight control systems; Landing gear systems; and Buoyancy for seaplanes and amphibians), there are minor revisions to reflect harmonization and ensure that language reflects performance-based regulations. There was an addition that the flight control system design should include an indication when control authority is reduced from nominal to account for unique characteristics of electronic flight control systems. The control system for the X-57 SCEPTOR will provide unique insights to inform the regulations and ASTM MOCs.

Occupant System Design Protection (§§23.2315-23.2320): There are some revisions from the FAST gap analysis to reflect harmonization. That information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Fire and High Energy Protection (§§23.2325-23.2335): There are some revisions from the FAST gap analysis to reflect harmonization. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

4.1.5. Normal Category Airplanes, Subpart E, Powerplant

Powerplant installation (§23.2400): The FAST gap analysis revised §23.2400(b) to provide a path to concurrent aircraft and propulsion approval for Level 1-4 aircraft.

Automatic power or thrust control systems (§23.2405): The FAST gap analysis revised the title to "Power or thrust control systems" as well as (a), (b) and (c) to account for manual, automatic and reverse power and thrust controls systems in powered lift aircraft. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available. The X-57, during Mod IV, conducts its flight test of the Distributed Electric Propulsion (DEP) system that will provide significant publicly available data of benefit to regulations and MOCs.

Powerplant installation hazard assessment (§23.2410): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Powerplant ice protection (§23.2415): The FAST gap analysis made no revisions to this section. Since the X-57 SCEPTOR of benefit to regulations and MOCs will be made available. Since since the X-57 SCEPTOR is based on the Tecnam P2006T, and there are restrictions from operating in known icing conditions as part of its type certificate data sheet. Accordingly, there will be no experience generated from the X-57 SCEPTOR regarding powerplant icing protection.

Reversing systems (§23.2420): The FAST gap analysis recommended deleting this section, as it was incorporated in the revised 23.2405, Power or thrust control systems.

Powerplant operational characteristics (§23.2425): The FAST gap analysis: (1) revised §23.2425(b) to account for characteristics of the automatic distributed electric propulsion system on this aircraft; (2) revised §23.2430(a)(6) to include criteria from §27.952 to account for powered lift configurations; and (3) deleted §23.2430(b)(4) for consistency with §25, §27 and §29. The X-57, during Mod IV, conducts its flight test of the Distributed Electric Propulsion (DEP) system that will provide significant publicly available data of benefit to revisions reflected in (1) and (2), and MOCs.

Powerplant induction and exhaust systems (§23.2435): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit, such as the performance of the battery exhaust system, to regulations and MOCs will be made available.

Powerplant fire protection (§23.2440): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit, such as the battery containment system, to regulations and MOCs will be made available.

4.1.6. Normal Category Airplanes, F, Equipment

Airplane level systems requirements (§23.2500): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Function and installation (§23.2505): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Equipment, systems, and installations (§23.2510): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Electrical and electronic system lightning protection (§23.2515): The FAST gap analysis revised §23.2515 to account for configurations with electronic flight and propulsion control systems. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

High-intensity Radiated Fields (HIRF) protection (§23.2520): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit, such as the NASA Electric Aircraft Testbed (NEAT) electromagnetic interference tests, to regulations and MOCs will be made available.

System power generation, storage, and distribution (§23.2525): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit, such as the power architecture and integrated power and control specifications and tests, to regulations and MOCs will be made available.

External and cockpit lighting (§23.2530): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Safety equipment (§23.2535): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Flight in icing conditions (§23.2540): The FAST gap analysis revised §23.2540 to allow for future means of complying with flight in icing, and §23.2540(b) to reflect the change from stall speed to minimum flight speed. Since the X-57 SCEPTOR is based on the Tecnam P2006T, and there are restrictions from operating in known icing conditions as part of its type certificate data sheet. Accordingly, there will be no experience generated from the X-57 SCEPTOR regarding flight in icing protection.

Pressurized systems elements (§23.2545): The FAST gap analysis made no revisions to this section. The operational profile for the X-57 SCEPTOR precludes the requirement for pressurization. Accordingly, there will be no experience generated from the X-57 SCEPTOR regarding pressurized systems.

Equipment containing high-energy rotors (§23.2550): The FAST gap analysis deleted §23.2550 as its intent is covered in §23.2250(c) and for harmonization.

4.1.7. Normal Category Airplanes, G, Flightcrew Interface and Other Information

Flightcrew interface (§23.2600): The FAST gap analysis revised §23.2600(a) to reflect applicable modes and phases of flight, and §23.2600(b) to accommodate non-traditional pilot-aircraft interfaces; and deleted §23.2600(c) as it is better addressed by MOC. Information from the X-57 SCEPTOR of benefit, such as the simulation and flight test of displays, to regulations and MOCs will be made available.

Installation and operation (§23.2605): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit, such as the simulation and flight test of displays, to regulations and MOCs will be made available.

Instrument markings, control markings, and placards (§23.2610): The FAST gap analysis made no revisions to this section. Information from the X-57 SCEPTOR of benefit, such as the simulation and flight test of displays, to regulations and MOCs will be made available.

Flight, navigation, and powerplant instruments (§23.2615): The FAST gap analysis revised §23.2615(a) to reflect both phases and modes of flight, and revised §23.2615 (b)(2) to clarify applicability. Information from the X-57 SCEPTOR of benefit, such as the simulation and flight test of displays, as well as telemetered data, to regulations and MOCs will be made available.

Airplane flight manual (§23.2620): The FAST gap analysis revised §23.2620 to remove (b)(1) and (b)(2) which may be reflected in MOC. Information from the X-57 SCEPTOR of benefit, such as the operational procedures and performance to those procedures, to regulations and MOCs will be made available.

4.2. Summary of Aircraft Engines Regulations (FAR 33) and X-57

Installation of electric propulsion units, electrical storage systems and distributed electric propulsion were not envisioned when 14 CFR part 33 was created.

The aircraft engine regulations, Part 33—Airworthiness Standards: Aircraft Engines¹², was reviewed to examine how the X-57 SCEPTOR might contribute to the regulations and ASTM MOC. The review focused on FAR 33, Subpart A, General; Subpart B, Design and Construction-General; Subpart C, Design and Construction-Reciprocating Aircraft Engines; and Subpart D, Block Tests-Reciprocating Aircraft Engines.

The X-57 SCEPTOR Power and Command Integrated Product Team produced a report, “Electric Cruise Motor Testing Standards,”¹³ the purpose of which was to provide testing insight for the X-57 Maxwell SCEPTOR regarding the Cruise Motor Test and any applicable aircraft engine testing requirements under the Federal Aviation Regulations (FAR) Part 33. The requirements were used as guidelines and not stringent requirements. However, as part of the X-57 Maxwell testing, new aircraft electric motor testing standards are likely to be developed. Therefore, a thorough examination of the current testing requirements will help shape the new aircraft electric motor testing regulations in the future. A matrix of proposed test methods was proposed and tabulated against the FAR 33. These items are identified in the PCM and reflected below.

A cursory review of the turbine aircraft engine Subpart E, Design and Construction-Turbine Aircraft Engines; and Subpart F, Block Tests-Turbine Aircraft Engines, revealed that to a first-order, few of the sections would be informed by the X-57 SCEPTOR technology. The sections of FAR 33, subpart E, Design and Construction-Turbine Aircraft Engines, such as §33.62, Stress analysis; §33.63, Vibration; §33.70, Engine life-limited parts; §33.71, Lubrication system; §33.73, Power or thrust response; §33.74, Continued rotation; and §33.75, Safety analysis, may benefit from the X-57 SCEPTOR technology demonstration. The sections of FAR 33, subpart F, Block Tests for Turbine Aircraft Engines, such as §33.83, Vibration test; §33.85, Calibration tests; §33.87, Endurance test; §33.89, Operation test; §33.90, Initial maintenance inspection test; §33.91, Engine system and component tests; and §33.95, Engine-propeller systems tests may benefit from the X-57 SCEPTOR technology demonstration. But the benefit assessment for both of those subparts is for a subsequent report.

¹² 14 CFR 33, General, Design and Reciprocating Aircraft Engines, Dated 3 October 2018, (<https://www.ecfr.gov/cgi-bin/retrieveECFR?&n=pt14.1.33>)

¹³ “Electric Cruise Motor Testing Standards: FAR-Part 33: Airworthiness Standards: Aircraft Engines, Selected sections pertaining to an electric aircraft motor,” NASA AFRC, 10/20/2016.

The Means of Compliance (MOC) for Electric Propulsion Units (EPU) was developed under ASTM Committee F39.05 and is a draft standard “Design of Electric Propulsion Units for General Aviation Aircraft”¹⁴. It is intended to contain both the regulatory and standards language, and as it evolves, the regulatory language will be excerpted for use by the FAA, and the remaining language will contain the pure standard language.

4.2.1. Aircraft Engines, Subpart A—General

Applicability (§33.1): Applicable unchanged.

General (§33.3): Applicable unchanged.

Instructions for Continued Airworthiness (§33.4): The MOC in the draft WK47374, §5.1 are applicable.

Instruction manual for installing and operating the engine (§33.5): The MOC in the draft WK47374, §5.2 are applicable. Information from the X-57 SCEPTOR of benefit, such as the power architecture and integrated power and control specifications, to regulations and MOCs will be made available.

Engine ratings and operating limitations (§33.7): The MOC in the draft WK47374, §5.3 are applicable. Information from the X-57 SCEPTOR of benefit, such as the electric motor ratings and operating limitations (identified in the ORD, for example), to regulations and MOCs will be made available.

Selection of engine power and thrust ratings (§33.8): The MOC in the draft WK47374, §5.3, in particular §5.3.3, *et sequa*, are applicable. Information from the X-57 SCEPTOR of benefit, such as the electric motor ratings and operating limitations (identified in the ORD, for example), to regulations and MOCs will be made available.

4.2.2. Aircraft Engines, Subpart B—Design and Construction

Applicability (§33.11): Applicable unchanged.

Materials (§33.15): The MOC in the draft WK47374, §5.5 are applicable. Information from the X-57 SCEPTOR of benefit, such as the electric motor materials, to regulations and MOCs will be made available.

Fire protection (§33.17): The MOC in the draft WK47374, §5.6 are applicable. Information from the X-57 SCEPTOR of benefit, such as the battery containment, to regulations and MOCs will be made available.

Durability (§33.19): The MOC in the draft WK47374, §5.7 are applicable. Information from the X-57 SCEPTOR of benefit, such as a durability test on the Airvolt, to regulations and MOCs will be made available.

¹⁴ ASTM F39.05, WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, “ITEM_2_EPU_WK47374_v2.pdf” Dated 31 July 2018, in revision. (https://compass.astm.org/CUSTOMERS/COLLAB/FILES/10514620180905_WKGROUP.pdf)

Engine cooling (§33.21): The MOC in the draft WK47374, §5.8 are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Engine mounting attachments and structure (§33.23): The MOC in the draft WK47374, §5.8 are applicable. Information from the X-57 SCEPTOR of benefit, such as wingtip mounting of the engines, to regulations and MOCs will be made available.

Accessory attachments (§33.25): Applicable uncharged.

Turbine, compressor, fan, and turbosupercharger rotor overspeed (§33.27): The MOC in the draft WK47374, §5.9 are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Engine control systems (§33.28): The MOC in the draft WK47374, §5.10 are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Instrument connection (§33.29): The MOC in the draft WK47374, §5.11 are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

4.2.3.Aircraft Engines, Subpart C—Design and Construction; Reciprocating Aircraft Engines

Applicability (§33.31): Applicable uncharged.

Vibration (§33.33): The MOC in the draft WK47374, §5.12 are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Turbocharger rotors (§33.34): Not applicable.

Fuel and induction system (§33.35): Not applicable. *(This may be an area where energy storage system and distribution may be a consideration.)*

Ignition system (§33.37): Not applicable.

Lubrication system (§33.39): The MOC in the draft WK47374, §5.16 are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

4.2.4.Aircraft Engines, Subpart D—Block Tests; Reciprocating Aircraft Engines

Applicability (§33.41): Applicable uncharged.

General (§33.42): Applicable uncharged.

Vibration test (§33.43): The MOC in the draft WK47374, §5.20.3, Vibration test are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Calibration tests (§33.45): The MOC in the draft WK47374, §5.20.6, calibration test are applicable. Information from the X-57 SCEPTOR of benefit to regulations and MOCs will be made available.

Detonation test (§33.47): Not applicable.

Endurance test (§33.49): The MOC in the draft WK47473, §§5.20.2, Endurance and durability test are applicable. Information from the X-57 SCEPTOR durability test plan, and subsequent test data of benefit to regulations and MOCs will be provided.

Operation test (§33.51): The MOC in the draft WK47473, §§5.20.7, Operation test are applicable. Information from the X-57 SCEPTOR electric cruise motor test plan, and subsequent test data of benefit to regulations and MOCs will be provided.

Engine system and component tests (§33.53): The MOC in the draft WK47473, §§5.20.XXXX, YYYY test are applicable. Information from the X-57 SCEPTOR electric cruise motor test plan, and subsequent test data of benefit to regulations and MOCs will be provided.

Teardown inspection (§33.55): The MOC in the draft WK47473, §§5.22, Teardown inspection are applicable. Information from the X-57 SCEPTOR electric cruise motor test plan, and subsequent test data of benefit to regulations and MOCs will be provided.

General conduct of block tests (§33.57):

4.2.5. Aircraft Engines, Subpart F-Block Tests; Turbine Aircraft Engines

Engine overtorque test (§33.84): When approval is sought for a transient maximum EPU overtorque, the turbine engine section is appropriate, and the draft WK47374 §5.20.4 is applicable. This test will become part of endurance test procedures (WK47374, §5.20.3) if elected to be pursued. Results from the X-57 SCEPTOR endurance test as planned in “Propulsion Systems Acceptance Testing on Airvolt” will be provided as available.

Engine overtemperature test (§33.88): When approval is sought for an EPU overtemperature, the turbine engine section is appropriate, and the draft WK47374 §5.20.5 is applicable. This test will become part of endurance test procedures (WK47374, §5.20.3) if elected to be pursued. Results from the X-57 SCEPTOR endurance test as planned in “Propulsion Systems Acceptance Testing on Airvolt” will be provided as available.

4.3. Summary of Propellers Regulations (FAR 35) and X-57

Installation of electric propulsion units, electrical storage systems and distributed electric propulsion were not envisioned when 14 CFR part 33 was created.

The X-57 SCEPTOR is based on a Tecnam P2006T, and while the wing and motors have been modified, the propeller is the same propeller as approved in the Type Certificate Data Sheet, which are two MT Propeller MTV-21. The data derived from the X-57 SCEPTOR will baseline performance during Mod I and II, and during Mods III and IV will be evaluated with the electric power unit.

In addition to the “tractor motor” propellers (those used for cruise flight), the X-57 SCEPTOR has propellers designed for the Distributed Electric Propulsion demonstrations and are only used for take-off and landing, and stowed in flight. This presents a unique opportunity to inform FAR 35 with a high-lift device technology.

The regulations for FAR 35, Airworthiness Standards: Propellers¹⁵ will be reviewed by subpart.

4.3.1. Propellers, Subpart A—General

Applicability (§35.1): Applicable uncharged.

Propeller configuration (§35.2): Applicable uncharged.

Instructions for propeller installation and operation (§35.3): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Instructions for Continued Airworthiness (§35.4): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Propeller ratings and operating limitations (§35.5): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Features and characteristics (§35.7): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

4.3.2. Propellers, Subpart B—Design and Construction

Safety analysis (§35.15): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Propeller critical parts (§35.16): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Materials and manufacturing methods (§35.17): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Durability (§35.19): Applicable uncharged for cruise motor propellers. Will provide unique DEP propeller data.

Variable and reversible pitch propellers (§35.21): XXXXX

Feathering propellers (§35.22): Applicable uncharged for MTV-21. Will provide unique DEP propeller data.

Propeller control system (§35.23): Applicable uncharged for MTV-21. Will provide unique DEP propeller data.

Strength (§35.24): Applicable uncharged for MTV-21. Will provide unique DEP propeller data.

4.3.3. Propellers, Subpart C—Tests and Inspections

General (§35.33): Applicable uncharged for MTV-21. Will provide unique DEP propeller data.

¹⁵ 14 CFR 35, Dated 3 October 2018, (<https://www.ecfr.gov/cgi-bin/retrieveECFR?&n=pt14.1.35>)

Inspections, adjustments and repairs (§35.34): Applicable unchanged for MTV-21. Will provide unique DEP propeller data.

Centrifugal load tests (§35.35): Applicable unchanged for MTV-21. Will provide unique DEP propeller data.

Bird impact (§35.36): No tests conducted.

Fatigue limits and evaluation (§35.37): Applicable unchanged for MTV-21. Will provide unique DEP propeller data.

Lightning strike (§35.38): No tests conducted.

Endurance test (§35.39): Tested with the MTV-21 attached during Airvolt electric motor durability tests.

Functional test (§35.40): No tests conducted with electric motor.

Overspeed and overtorque (§35.41): Tested as part of the overspeed and overtorque electric motor tests.

Components of the propeller control system (§35.42): No specific test conducted.

Propeller hydraulic components (§35.43): No specific test conducted.

4.4. Accounting for Electric Storage Systems in the FAR and X-57

Currently there is no reference for Electric Storage Systems (ESS, such as batteries in the case of the X-57 SCEPTOR) within the Federal Aviation Regulations. The approach is to fit ESS certification within references to fuel and-or fuel systems within FAR 23 and 33. The current means of compliance for ESS is the ASTM Committee F39.05 under the draft WK56255¹⁶. This draft standard is, as of this report, in flux.

There are five germane section within the current draft of WK56255. Those are: §6. Data requirements; §7. Design criteria; §8. Performance; §9. Safety requirements; and §10. Testing and qualification requirements.

The X-57 SCEPTOR program has extensive design and test data that will be provided to the ASTM committee during Mod II, as well as Mod III and IV.

5. Conclusion

None of the Federal Aviation Regulations envisioned electric propulsion when the regulations were promulgated. Further, most of the technology for spark ignition reciprocating engines had been innovated decades ago, so that subsequent certifications of newer reciprocating engines had an heritage, along with legacy means of compliance so that certification was clear-cut.

¹⁶ ASTM F39.05, WK56255, Design of Electric Propulsion Energy Storage Systems for General Aviation Aircraft, DRAFT STANDARD, Dated 21 May 2018, "WK56255-6.docx", (<https://compass.astm.org/CUSTOMERS/COLLAB/FILES/WK56255-6.docx>)

Recent technology innovations in vehicle concepts and the technology that support the vehicles have pushed the limits of their ability to be certified. The FAA's recent response to that challenge with its regulation by objective, supported by the update of FAR 23 to amendment 23-64 show a remarkable intent to adapt to the technology challenge. In particular, the ASTM committees to develop standards that support these standards are laudable.

Accordingly, there can now be made a clear mapping between the regulations and certification criteria and the X-57 SCEPTOR program. The results of planning and tests from the program is able to address still-open questions and challenges in the development of the means of compliance to the ASTM standards, as well as gaps between the existing regulations and the new vehicles that are pushing innovative technologies.

This report describes a generic method for addressing any new technology to its associated set of regulations and certification criteria. The result is a framework under which a detailed assessment can be conducted.

Using just such a framework, the report maps the detailed updated regulations and evolving ASTM standards to the particular technology planning and tests.

As a result, a roadmap of NASA technology is documented that shows clear transfer of technology data to industry (standards developers, as well as technology developers) and the FAA regulatory policy and certification staff upon whom certification and policy will be data-driven.

The framework also revealed the significant contributions that NASA X-57 SCEPTOR will make to the industry and regulatory-standards community: Distributed Electric Propulsion technology demonstration will directly affect most of the revision in the FAST Gap Analysis and provides a foundation for eVTOL technology; and the cruise motor contributes directly to WK47374 MOC.

It is important to note that the means by which the NASA X-57 SCEPTOR project contributes to the industry and regulators is through the active participation in the specific technical subcommittees of the ASTM Committee F44 on General Aviation Aircraft and Committee F39 on Aircraft Systems. Through this participation, the knowledge of the NASA X-57 SCEPTOR will make immediate and lasting contributions to the industry and regulators.

In addition to identifying contributions, the framework also exposed gaps in the technology program to standards community needs, such as the effect of icing on EPU operation.

The framework highlighted a need for some form of regulatory references for Electric Storage System regulations. While this may begin with the use of a Special Condition, and after sufficient applications and a recognized need for such, potentially the regulators may consider a regulation.

The framework identified some regulations in need of revision. For example, FAR 33.47, Detonation test, is only applicable to spark ignition, reciprocating engines, and is not applicable to electric propulsion units. Another regulation, FAR 33.49, Endurance test, Reciprocating Aircraft Engines (and, perhaps, FAR 33.87, Endurance test, Turbine Aircraft

Engines), requires some fundamental reexamination, as to its test objectives and subsequent methods, practices and means of testing.

Further, the unique approach to high-lift in the X-57 SCEPTOR project of Distributed Electric Propulsion, and in particular, the use of folding-blade propellers on the smaller motors, has no reference in FAR 33, Aircraft Engines, or FAR 35, Propellers. And while the European Aviation Safety Agency has certified a number of gliders with folding propellers, there does not appear to be any references in their regulation CS-P (equivalent to FAR 33). In this case, The NASA requirements, specifications and technical reports must contribute to the technical subcommittees in ASTM Committee F44 on General Aviation Aircraft and Committee F39 on Aircraft Systems, which are focusing on Distributed Electric Propulsion, and provide these technical subcommittees with the NASA data.

Future work should include the development of new standards and means of compliance based on the new insights from the NASA X-57 SCEPTOR flight project. Planning for and contributing to the ASTM standards process must become a key objective of the project.

Additional work should be considered to streamline the collection of the data used to implement the results of this report. Application of a formal Model-Based Systems Engineering techniques will make the application of the approach used in this report much more agile to future projects, and would provide the means to assess trades of standards versus technology versus regulatory approach, much more agile, while maintaining the integrity of the approach described in this report.

Further, this approach described within this report should be applied to future NASA projects. The concept of NASA playing a key role, not only to industry, but also to the development of new standards and the application of those new standards to the evolution of regulatory material, should be a significant consideration in the decision-making of a new project.

Appendix A, The “Proposed Compliance Matrix” (PCM) Deconstructed

The following tables reflect the Proposed Compliance Matrix, PCM, for each of the Federal Aviation Regulations, and shows the paragraph-level reference from the FAR, any notes, an assessment of the applicability to electric propulsion (unchanged, tailored or revised, from Figure 5, in section 2.2), a reference to the current Means of Compliance referencing an ASTM standard (or draft standard, as applicable), and, finally an entry reflecting the source of X-57 SCEPTOR Mod I, II, III or IV reference.

Table A-1 shows the PCM for FAR 23, while A-2 reflects FAR 33 and A-3 shows FAR 35.

Subpart	Section	Note	FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST language recommendation read.docx", email from NASA to NASA, dated 11 Sep 2018)	Associated FAST Footnote	Accepted Means of Compliance; Airworthiness Standards for Category Airplanes (Federal Register, Friday, May 11, 2018 Rules and Regulations, Notice No. 25-10-01-ROB)	Citation of the Means of Compliance in relevant ASTM Standard, Combined with Changes as Noted in (email) from FAA/DO	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod IV
		(6) The recorder container must be located and heat damage to the recorder from fire. (1) Except as otherwise specified, the recorder container must be located as far as is practicable, but need not be outside of the pressurized compartment, and may not be located where aft-impact. (2) If two separate combination digital flight data recorder and cockpit voice recorder units are installed to comply with the cockpit voice recorder requirements may be located near the cockpit.					UNCHANGED			
		(f) If the cockpit voice recorder has a bulk, ensure device, the installation must be designed to minimize the vibration and excitation of the device during crash impact.					UNCHANGED			
		(g) Each recorder container must— (1) Be either bright orange or bright yellow; (2) Have reflective tape affixed to its external surface to facilitate its location during crash impact; (3) Be secured to the structure of the airplane, or adjacent to the container, which is secured in such manner that they are not likely to be separated during crash impact.					UNCHANGED			
	\$23.1455 Flight data recorder.	(d) Each flight recorder required by the operating rules supplied with airspeed, altitude, and directional data obtained from sources that meet the aircraft level accuracy requirements specified in § 23.2900. (2) The vertical acceleration sensor is rigidly attached, and located longitudinally either within the approved center of gravity limits of the airplane, or within 25 percent of the airplane's mean aerodynamic chord. (3)(i) It receives its electrical power from the airplane's electrical system, and is protected against loss of power to essential or emergency loads; (ii) It remains powered for as long as possible without jeopardizing the recording of flight data; (iii) It has an internal or external means for preflight checking of the recorder for proper recording of data in the storage medium; (5) Except for recorders powered solely by an automatic means to automatically stop a recorder that has a data ensure feature and prevent each after crash impact; (6) Any single electrical failure external to the recorder does not disable both the cockpit voice recorder and the flight data recorder; and (7) The flight data recorder must be located only the flight data recorder requirements, a combination unit is required as a cockpit voice recorder to comply with § 23.1457(e)(2), a combination unit must be used to comply with this flight data recorder requirement.			ASTM F5664-17, section 5.1.3	15 Instructions of Flight Data Recorders, 0, 10, 1 F3081/F3081M – 17 Standard Specification for Systems and Equipment in Small Aircraft § 9.13.1.1 F3229 – 17 Standard Specification for Flight Data and Voice Recording in Small Aircraft	UNCHANGED	QRD 857.9, 7, 4, and 9.10, accommodated w/ the experimental data and voice telemetry	QRD 857.9, 7, 4, and 9.10, accommodated w/ the experimental data and voice telemetry	QRD 857.9, 7, 4, and 9.10, accommodated w/ the experimental data and voice telemetry
		(b) Each non-ejectable record container must be located and mounted so as to minimize the probability of damage to the record container from fire. In meeting the requirement, the record container must be located in a pressurized compartment, and may not be where aft-mounted engines may crush the container upon impact.					UNCHANGED			
		(c) A correlation must be established between the flight recorder readings of airspeed, altitude, and heading (or correlation factor) of the first pilot's instruments. The correlation must cover the airspeed range over which the airspeed indicator is required to be accurate to which the airspeed is limited, and 360 degrees of heading. Correlation may be established on the ground as appropriate.					UNCHANGED			
		(d) Each recorder container must— (1) Be either bright orange or bright yellow; (2) Have reflective tape affixed to its external surface to facilitate its location under water; and (3) Have an underwater locating device, when required by the operating rules of the aircraft, which is secured in such manner that they are not likely to be separated during crash impact.					UNCHANGED			
		(e) Any novel or unique design or operational characteristics of the aircraft shall be evaluated to determine if additional flight recorders are required in addition to or in place of existing requirements.					UNCHANGED			
	\$23.1520 Instructions for continued airworthiness.				ASTM F5664-17, section 10.6	10.6 Instructions for Continued Airworthiness, 10.6.1 Protection for General Aviation § 10.6.2 F3117 – 15 Standard Specification for Crew-Initiated Aircraft	UNCHANGED	Not captured for experimental aircraft	Not captured for experimental aircraft	Not captured for experimental aircraft

Subpart	Section	Note	FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST language recommendation read.docx", email from NASA to HSA, dated 11 Sep 2018)	Associated FAST Footnote	Accepted Means of Compliance: Airworthiness Standards for Category Airplanes (Federal Register, Vol. 83, No. 107, Friday, May 11, 2018 Rules and Regulations, Notice No. 25-10-91-ROB)	Citation of the Means of Compliance in relevant ASTM Standard, Combined with Changes as Noted in (bracket) from FAR/DO	Assessment of Applicability	Validation Method, X-57 Mod II	Validation Method, X-57 Mod I	Validation Method, X-57 Mod IV
		(c) Residual control forces must not fatigue or distract the pilot. Residual control forces must not be likely abnormal or emergency operations, including a critical loss of thrust on multiengine airplanes. [The term "control forces" includes control force gradients.] (F16)	(c) Residual control forces must not fatigue or distract the pilot. Residual control forces must not be likely abnormal or emergency operations, including a critical loss of thrust on multiengine airplanes. [The term "control forces" includes control force gradients.] (F16)	(F16)-Revised §23.2145 (b) and (c), and added powered lift characteristics.			REVISED			
	§23.2145 Stability.	(6) Airplane not certified for aerobatics must— (1) Have static longitudinal, lateral, and directional stability in normal operations. (2) Have dynamic short period stability in normal operations. (3) Provide stable control throughout the operating envelope. (4) Exhibit stable characteristics, if applicable, in normal operations, and (F16)	(6) Airplane not certified for aerobatics must— (1) Have static longitudinal, lateral, and directional stability in normal operations. (2) Have dynamic short period stability in normal operations. (3) Provide stable control throughout the operating envelope. (4) Exhibit stable characteristics, if applicable, in normal operations, and (F16)	(F17)-Revised §23.2145 (b) (2) to address dynamic stability in general and allow for the appropriate MOC as needed. (F17)-2145 (b) (3) language from "control force feedback" to "control feedback" to account for anticipated configurations. (F18)-Added §23.2145 (b) (4) to address control system stability at airplane level.	ASTM F2364-17, section 5.10	5.10 Stability, 5.10.1 F2379(5) 73M – 15 Standard Specification for Handling Characteristics of Airplanes	REVISED			
		(b) No airplane may exhibit any divergent longitudinal stability characteristic (1) within its approved flight envelope, or (2) otherwise endanger the airplane and its occupants.	(b) No airplane may exhibit any divergent longitudinal stability characteristic (1) within its approved flight envelope, or (2) otherwise endanger the airplane and its occupants.	(F20)-Revised §23.2145 (b) to account for unique powered lift characteristics.			REVISED			
	§23.2150 Stall characteristics, stall warning, and spins.	(a) The airplane must have controllable stall characteristics and stall warning that provides sufficient margin to prevent inadvertent stalling.	FAST 23.2150 (Minimum safe speed flight) spins. (F21) (a) The airplane must have controllable (minimum safe speed flight) (F21) characteristics in straight flight, turning flight, and accelerated turning flight. (F21) warning that provides sufficient margin to prevent inadvertent stalling (if applicable) (F21).	(F21)-Revised §23.2150 to reflect requirements with minimum safe speed, and to clarify applicability.	ASTM F2364-17, section 5.11	5.11 Stall Characteristics, Stall Warning, and Spins: Low-Speed Flight Characteristics of Airplanes	REVISED			
		(b) Single-engine airplanes, not certified for aerobatics, must not have a tendency to inadvertently depart controlled flight.	NO CHANGE				UNCHANGED			
		(c) Levels 1 and 2 multiengine airplanes, not certified for aerobatics, must not have a tendency to inadvertently depart controlled flight.	NO CHANGE				UNCHANGED			
		(d) Airplane certified for aerobatics that includes spins must have controllable stall characteristics and the ability to recover within one and one-half additional turns after initiation of the first control action from any number of turns for which certification is required, while remaining within the operating limitations of the airplane.	NO CHANGE				UNCHANGED			
	§23.2155 Ground and water handling characteristics.	(6) Spin characteristics in airplanes certified for aerobatics must not result in unrecoverable spins— (1) With any typical use of the flight or engine power controls; or (2) Due to pilot overreaction or incapacitation.	NO CHANGE				UNCHANGED			
	§23.2160 Vibration, buffeting, and high-speed characteristics.	(a) Vibration and buffeting, for operations up to VDMO, must not interfere with the control of the airplane or buffet within these limits is allowable. Stall warning buffet within these limits is allowable.	(a) Vibration and buffeting, for operations up to VDMO, must not interfere with the control of the airplane or buffet within these limits is allowable. [Each part of the aircraft must be free from excessive vibration under each appropriate speed and power condition.] (F25)	(F25)-Subpart 23.2155, as this part is covered in recommended §23.2135 and for harmonization.	ASTM F2364-17, section 5.12	5.12 Control of stall, buffet, stall warning, Characteristics: Handling Characteristics of Airplanes	REVISED	N/A	N/A	N/A
		(b) For high-speed airplanes and all airplanes with a maximum operating speed greater than 7600 meters (25000 feet) pressure altitude, there must be no buffet at any speed up to VMO/MMO, except stall buffet, which the onset of perceptible buffet occurs in the cruise configuration within the operational envelope. Likely inadvertent excursions beyond this boundary must not result in structural damage.	NO CHANGE	(F26)-Revised §23.2160 (b) to add language from §27.257 to account for powered lift characteristics of powered lift aircraft.	ASTM F2364-17, section 5.13	5.13 Vibration, Buffeting, and High-Speed Characteristics: 5.13.1 F3173(F3) 73M – 15 Standard Specification for Handling Characteristics of Airplanes	REVISED			
		(d) High-speed airplanes must have recovery capability of control, beginning at any speed up to VMO/MMO, following— (1) An inadvertent speed excursion that occurs in the cruise configuration where dynamic pressure can impair the longitudinal trim system operation.	NO CHANGE				UNCHANGED			

Subpart	Section	Note	FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST INSUR" to ISAC), dated 11 Sep 2018)	Associated FAST Footnote	Accepted Means of Compliance: Airworthiness Standards for Normal Category Airplanes (Federal Register, Vol. 73, No. 107, Friday, May 31, 2008)	Citation of the Means of Compliance in relevant ASTM Standard, Combined with Changes as Noted in (unless from FAR/DOA)	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod IV
		(f) A means to extinguish fire within a fire zone, except for fire zones located outside the pilot's view. (2) Any fire zone located outside the pilot's view. (2) Any fire zone embedded within the fuselage, which is not a fire zone on a level 4 airplane.	NO CHANGE		FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST INSUR" to ISAC), dated 11 Sep 2018)		UNCHANGED			
FAR 23, Airworthiness Standards: Normal Category Airplanes, F. Equipment	\$23.2500 Airplane level systems requirements.	This section applies generally to installed equipment requirements for a specific piece of equipment, system, or systems.	NO CHANGE		ASTM F2364-17, section 9.1.	9.1. Systems and Equipment Function and Safety Specification for Systems and Equipment in Small Aircraft ¶ 9.1.1 F3230 – 17 Standard Practice for Small Aircraft ¶ 9.1.2 F3231/F3231M – 17 Standard Specification for Electrical Systems in Small Aircraft ¶ 9.1.3 F3232 – 17 Standard Specification for Flight Controls in Small Aircraft ¶ 9.1.4 F3233/F3233M – 17 Standard Specification for Flight Controls in Small Aircraft ¶ 9.1.5 F3234 – 17 Standard Practice for Static Pressure System Tests in Small Aircraft ¶ 9.1.2 F3064/F3064M – 15 Standard Specification for Control Instruments and Sensors of Propulsion Systems ¶ 9.1.3 F3066/F3066M – 15 Standard Specification for Propulsion System Specific Hazard Mitigation ¶ 9.1.4 F3067 – 15 Standard Specification for Crew Interface in Aircraft	UNCHANGED	EXTRACT THIS FROM "Power and Command IPT"		
		(a) The equipment and systems required for an airplane to operate safely in the kinds of operations for which certification is requested (Day VFR, Night VFR, IFR, etc.) must be designed and installed so that the level of safety applicable to the certification and performance level of the airplane, and (2) Perform their intended function throughout the operating and maintenance life of the airplane as certificated.	NO CHANGE				UNCHANGED			
		(b) The systems and equipment not covered by paragraph (a), considered separately and in relation to other systems, must be designed and installed so their operation does not have an adverse effect on the airplane or its occupants.	NO CHANGE				UNCHANGED			
	\$23.2505 Function and installation.	When installed, each item of equipment must function as intended.	NO CHANGE		ASTM F2364-17, section 9.2.	9.2 Equipment Function and Installation Requirements: 9.2.1 F3061/F3061M – 17 Standard Specification for Systems and Equipment in Small Aircraft ¶ 9.2.2 F3231/F3231M – 17 Standard Specification for Electrical Systems in Small Aircraft ¶ 9.2.3 F3232 – 17 Standard Specification for Flight Controls in Small Aircraft ¶ 9.2.4 F3233/F3233M – 17 Standard Specification for Flight Controls in Small Aircraft ¶ 9.2.5 F3234 – 17 Standard Practice for Static Pressure System Tests in Small Aircraft ¶ 9.2.2 F3064/F3064M – 15 Standard Specification for Control Instruments and Sensors of Propulsion Systems ¶ 9.2.3 F3066/F3066M – 15 Standard Specification for Propulsion System Specific Hazard Mitigation ¶ 9.2.4 F3067 – 15 Standard Specification for Crew Interface in Aircraft	UNCHANGED			
	\$23.2510 Equipment, systems, and installations.	For any airplane system or equipment whose failure or abnormal operation has not been specifically identified in the applicable airworthiness standard, the applicant must design and install each system and equipment, such that there is a logical and acceptable level of safety for the intended operation, and the severity of failure conditions to the extent that:	NO CHANGE		ASTM F2364-17, section 9.3.	9.3 Equipment, Systems, and Installation 9.3.1 F3061/F3061M – 17 Standard Specification for Systems and Equipment in Small Aircraft ¶ 9.3.2 F3231/F3231M – 17 Standard Specification for Electrical Systems in Small Aircraft ¶ 9.3.3 F3232 – 17 Standard Specification for Flight Controls in Small Aircraft ¶ 9.3.4 F3233/F3233M – 17 Standard Specification for Flight Controls in Small Aircraft ¶ 9.3.5 F3234 – 17 Standard Practice for Static Pressure System Tests in Small Aircraft ¶ 9.3.2 F3064/F3064M – 15 Standard Specification for Control Instruments and Sensors of Propulsion Systems ¶ 9.3.3 F3066/F3066M – 15 Standard Specification for Propulsion System Specific Hazard Mitigation ¶ 9.3.4 F3067 – 15 Standard Specification for Crew Interface in Aircraft	UNCHANGED			
	\$23.2515 Electrical and electronic system lightning protection.	(a) Each catastrophic failure condition is extremely improbable; (b) Each hazardous failure condition is extremely remote, and (c) Each major failure condition is remote. An airplane approved for IFR operations must meet the following requirements, unless an applicant shows that exposure to lightning is unlikely. (d) Each electrical or electronic system that performs a function, the failure of which would prevent the continued safe flight and landing of the airplane, must be designed and installed such that— (1) This function is not adversely affected during and after the time the airplane is exposed to lightning; and (2) The system recovers normal operation of that function in a timely manner after the airplane is exposed to lightning, unless the system's recovery conflicts with other operational or functional requirements of the system. (e) Each electrical and electronic system that performs a function, the failure of which would significantly reduce the capability of the airplane or the ability of the flightcrew to respond to an adverse operating condition, must be designed and installed such that the system recovers normal operation of that function in a timely manner after the airplane is exposed to lightning.	NO CHANGE	(F4)-Revised §23.2515 to account for configurations with electronic light and propulsion control systems. (F4)-Revised §23.2515 to account for configurations with electronic light and propulsion control systems. (F4)-Revised §23.2515 to account for configurations with electronic light and propulsion control systems.	ASTM F2364-17, section 9.4	9.4 Electrical and Electronic System Lightning Protection: 9.4.1 F3061/F3061M – 17 Standard Specification for Systems and Equipment in Small Aircraft	REVISOR	Provision PMAD protection, FICUI System;		
		(a) Each catastrophic failure condition is extremely improbable; (b) Each hazardous failure condition is extremely remote, and (c) Each major failure condition is remote. An airplane approved for IFR operations must meet the following requirements, unless an applicant shows that exposure to lightning is unlikely. (d) Each electrical or electronic system that performs a function, the failure of which would prevent the continued safe flight and landing of the airplane, must be designed and installed such that— (1) This function is not adversely affected during and after the time the airplane is exposed to lightning; and (2) The system recovers normal operation of that function in a timely manner after the airplane is exposed to lightning, unless the system's recovery conflicts with other operational or functional requirements of the system. (e) Each electrical and electronic system that performs a function, the failure of which would significantly reduce the capability of the airplane or the ability of the flightcrew to respond to an adverse operating condition, must be designed and installed such that the system recovers normal operation of that function in a timely manner after the airplane is exposed to lightning.	NO CHANGE				REVISOR	Provision PMAD protection, FICUI System;		

Subpart	Section	Note	FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST language recommendation read.docx", email from NASA to HSA, dated 11/26/2013)	Associated FAST Footnote	Accepted Means of Compliance: Airworthiness Subpart 23, Category Airplanes (Federal Register, 7/17/13, 78 FR 17777, Friday, May 31, 2013)	Citation of the Means of Compliance in relevant ASTM Standard, Combined with Changes as Noted in (b) from FAA (DOA)	Assessment of Applicability	Validation Method, X-57 (b)(2) II	Validation Method, X-57 (b)(2) I	Validation Method, X-57 (b)(2) II	Validation Method, X-57 (b)(2) I
	§23.2620 Airplane flight manual.	The applicant must provide an Airplane Flight Manual that must be delivered with each airplane.	[The applicant must provide an Airplane Flight Manual that must be delivered with each airplane.		ASTM F2644-17, Sections 3.15 and 10.5	5.15 Operating Limitations; 5.15.1 F3174/F3174M – Operating Limitations and Information for Aeroplanes § 10.5.9 Airplane Flight Manual; 10.5.11 F3117 – 15 Standard Operating Procedures for Aeroplanes § 10.5.12 F3174/F3174M – 15 Standard Specification for Establishing Operating Limitations and Information for Aeroplanes	TALORED	ORD Opns Proc's	ORD Opns Proc's	ORD Opns Proc's	ORD Opns Proc's
		(a) The Airplane Flight Manual must contain the following information— (1) Airplane operating performance information; (2) Loading information; and (5) Other information that is necessary for safe operation, including design, operating, or handling characteristics.	(a) The Airplane Flight Manual must contain the following information— (1) Airplane operating performance information; (2) Loading information; and (5) Other information that is necessary for safe operation, including design, operating, or handling characteristics.								
		(b) The following sections of the Airplane Flight Manual must be approved by the FAA in a manner specified by the administrator— (1) For low-speed, level 1, and 2 airplanes, those portions of the Airplane Flight Manual that contain the information specified in paragraph (a)(1) of this section; and (2) For high-speed level 1, and 2 airplanes and all level 3 and 4 airplanes, those portions of the Airplane Flight Manual that contain the information specified in paragraphs (a)(1) thru (a)(4) of this section.	(b) The Airplane Flight Manual must be approved by the FAA in a manner specified by the Administrator (F50)	(E50- Revised §23.2620 to remove (b) (1) and (b) (2) which may be reflected in MOC.			REVISED	ORD Opns Proc's	ORD Opns Proc's	ORD Opns Proc's	ORD Opns Proc's
Appendix A to Part 23—Instructions for Continued Airworthiness						10.6.1 Instructions for Continued Airworthiness; 10.6.1 Protection for General Aviation; 10.6.2 F3117 – 15 Standard Specification for Crew Interface in Aircraft	UNCHANGED				
	A3.1 General	(a) This appendix specifies requirements for the preparation of Instructions for Continued Airworthiness as required by this part.									
		(b) The Instructions for Continued Airworthiness for Continued Airworthiness for each engine and propeller (hereinafter designated "products"), for each appliance installed on the airplane, and for each system and component relating to the maintenance of those appliances and products with the airplane. If Instructions for Continued Airworthiness are not supplied by the manufacturer of the product, the Instructions for Continued Airworthiness for the airplane must include the information essential to the continued airworthiness of the airplane.									
		(c) The applicant must submit to the FAA a program to ensure that the Instructions for Continued Airworthiness are approved by the applicant or by the manufacturer of products and appliances installed in the airplane will be distributed.									
	A3.2 Format	(a) The Instructions for Continued Airworthiness must be in the form of a manual or manuals as appropriate for the quantity of data to be provided.									
		(b) The format of the manual or manuals must provide for a practical arrangement.									
	A3.3 Content	The contents of the manual or manuals must be prepared in the English language. The Instructions for Continued Airworthiness must contain the following manuals or sections and information:									
		(a) Airplane maintenance manual or section. (1) Introduction information that includes an explanation of the airplane's features and data to the extent necessary to understand the operation of the airplane. (2) A description of the airplane and its systems and installations including its engines, propellers, and appliances. (3) Basic control and operation information, including information on the operation of systems and systems are controlled and how they operate, including any special procedures and limitations that apply to the operation of the airplane. (4) Details regarding servicing points, capacities of tanks, reservoirs, types of fluids to be used, pressures applicable to the various systems, location of access points, and other information necessary for the safe and proper operation of the airplane. (5) Lubrication points, lubricants to be used, equipment required for servicing, low instructions and limitations, mooring, jacking, and leveling information.									

Subpart	Section	Note	FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST language recommendation reduces", email from NASA to HSA, dated 11 Sep 2018)	Associated FAST Footnote	Accepted Means of Compliance; Airworthiness Subpart Category Airplanes (Federal Register, Friday, May 31, 2018 Rules and Regulations, Notice No. 25-10-01-R08)	Citation of the Means of Compliance in relevant ASTM Standard, Combined with Changes as Noted in (email from FAST/NOA)	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod IV
		(l) Maintenance instructions. ¶ (1) Scheduling engines, auxiliary power units, propellers, accessories, instruments, and equipment that provides the maintenance instructions must be clearly identified, cleaned, inspected, adjusted, tested, and lubricated, and work recommended at these periods, intervals, and work recommended at these periods, intervals, or equipment manufacturer as the source of the information if the applicant shows that the item is not subject to wear, tear, or failure. The first repair or specialized maintenance techniques, test equipment, or expertise. The recommended overhaul periods and necessary cross reference to the maintenance instructions. In addition, the applicant must include an inspection program that includes the following information: (1) Identification of the maintenance instructions, how to recognize those malfunctions, and how to recognize those malfunctions; (2) Troubleshooting information describing probable causes, symptoms, and recommended actions; (3) Information describing the order and method of removing and replacing products and parts with any necessary precautions to be taken. ¶ (4) Other general instructions, such as: (1) Identification of the system testing during ground running, symmetry checks, weighing and determining the center of gravity, lashing and stowing, and storage limitations. (c) Diagrams of structural access plates and access points for visual inspections when access plates are not provided. (d) Details for the application of special inspection techniques including radiographic and ultrasonic testing where such processes are specified by the applicant. (e) Information needed to apply protective treatments to the structure after inspection. (f) All data relative to structural fasteners such as tension, shear or recommended ratios, and torque values. (g) A list of special tools needed. (h) Information needed to determine the applicability of repair methods. ¶ (1) Electrical loads applicable to the various systems. ¶ (2) Methods of balancing control surfaces. ¶ (3) Identification of control surfaces. ¶ (4) Special repair methods applicable to the airplane.	FAA Future Advanced Safety Team (FAST) Gap Analysis to New Technology and FAR 23 ("FAST language recommendation reduces", email from NASA to HSA, dated 11 Sep 2018)	Associated FAST Footnote	Accepted Means of Compliance; Airworthiness Subpart Category Airplanes (Federal Register, Friday, May 31, 2018 Rules and Regulations, Notice No. 25-10-01-R08)	Citation of the Means of Compliance in relevant ASTM Standard, Combined with Changes as Noted in (email from FAST/NOA)	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod IV
	A23.4 Airworthiness limitations section.	The instructions for Continued Airworthiness must be segregated and clearly distinguishable from the rest of the document. This section must set forth each instruction for Continued Airworthiness. The instructions must include related structural inspection procedure required for type certification. If the instructions for Continued Airworthiness consist of multiple documents, the instructions must be clearly identified and included in the principal manual. This section must contain a legible statement in a prominent location that the instructions for Continued Airworthiness are approved and specifies maintenance required under FAR 23.16 and 91.403 of Title 14 of the Code of Federal Regulations unless an alternative program has been FAA approved.								

Subpart	Section	Note	ASTM F39.05 WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, ITEM 2, EPU WK4 7374_v2.pdf - Dated 31 July 2018, in revision. (https:// compass.astm.org/ CUSTOMERS/ COLLATERALFILES/ 10218620180605_WK 47374.pdf)	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod III	Validation Method, X-57 Mod IV
	§33.5 Instruction manual for installing and operating the engine.	... prior to the issuance of the type certificate, and to the owner at the time of delivery of the engine, approved instructions for installing and operating the engine...	5.2 Instruction manual for installing and operating the EPU	TAILORED			
			<p>Note in ASTM WK47374 from F39.05</p> <p>5.2.1 Instructions for installing and operating the EPU must be made available to the CAA as part of the certification process and to the customer at the time of delivery of the EPU. The instructions must include directly or by reference to appropriate documentation at least the following: ¶ 5.2.1.1 Installation instructions ¶ Note: Coordination is recommended between the EPU manufacturer and the installer. However, if the installer is not identified at the time of EPU design, the following aspects still need definition in the installation instructions. ¶ 5.2.1.1.1 Note: Coordination is recommended between the EPU manufacturer and the installer. However, if the installer is not identified at the time of EPU design, the following aspects still need definition in the installation instructions. ¶ 5.2.1.1.2 An outline drawing of the EPU including overall dimensions. ¶ 5.2.1.1.3 A definition of the physical and functional interfaces, of all elements of the EPU, with the aircraft and aircraft equipment, including the propeller or fan when applicable, including the location and description of EPU connectors for attachment of accessories, wires, cables, cooling ducts, cowling and any other equipment attached to the EPU. ¶ 5.2.1.1.4 Where an EPU system relies on components that are not part of the EPU type design, the interface conditions and reliability requirements for those components, as used in the safety analysis, must be specified in the EPU installation instructions. If reliability values used in the safety analysis are based on assumptions, these assumed values must be specified in the EPU installation instructions. Requirements for mitigation means, that are not part of the EPU, must be specified in the installation and operation instructions. ¶ 5.2.1.1.5 A list of the instruments necessary for the control and operation of the EPU, including the overall limits of accuracy and transient response requirements, must be stated in a manner that allows the satisfactory nature of instruments as installed to be determined. ¶ Note: "Instrument" is used to refer to any device necessary to measure EPU parameters and convey them to the appropriate decision-making center, be that a pilot or software-based control. ¶ 5.2.1.1.6 The limits on environmental conditions, including EMI, HIRF and lightning, for which the EPU was designed and qualified. ¶ 5.2.1.2 Operation instructions. ¶ 5.2.1.2.1 The operating limitations established within the showing of compliance. ¶ 5.2.1.2.2 The power ratings and procedures for correcting for nonstandard atmosphere. ¶ 5.2.1.2.3 The recommended procedures, under normal and critical ambient conditions for — ¶ 5.2.1.2.3.1 Powering on; ¶ 5.2.1.2.3.2 Operating on the ground; ¶ 5.2.1.2.4 A description of the primary and all alternate modes; and any back-up system, together with any associated limitations, of the EPU control system and its interface with the aircraft systems, including the propeller or fan if these are integral with the EPU.</p>				

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	§33.7 Engine ratings and operating limitations.	(a) ... included in the engine certificate data sheet specified in §21.41 of this chapter, including ratings and limitations based on the operating conditions and information specified, and any other information found necessary for safe operation of the engine.	5.3 EPU operating limitations and ratings	TAILORED	CDR Day 1, page 148-152 (fs air cooled, direct drive; Operates in tandem with the MTV-7 propeller; Has an output torque of up to 255 N-m (~188 ft-lb); Has a full-torque operating speed range of 1700-2700 rpm; Accommodates use of a slip ring and MTV speed controller)		
		(b)(1) Horsepower or torque, r.p.m., manifold pressure, and time at critical pressure altitude and sea level pressure altitude for— (i) Rated maximum continuous power (relating to unsupercharged operation or to operation in each supercharger mode as applicable); and (ii) Rated takeoff power (relating to unsupercharged operation or to operation in each supercharger mode as applicable).	5.3.1 Ratings and operating limitations are established by the Administrator and included in the product certificate data sheet, including ratings and limitations based on the operating conditions and information specified in this section, as applicable, and any other information found necessary for safe operation of the engine. ¶ 5.3.2 EPU operating limitations are established as applicable, including: 5.3.2.1 Maximum transient rotor shaft overspeed and time, ¶ 5.3.2.2 Maximum Transient EPU overtorque and time, and number of overtorque occurrences ¶ 5.3.2.3 Maximum EPU overtorque and time ¶ 5.3.2.4 Electrical power, voltage, current, frequency and electrical power quality limits ¶ 5.3.2.5 Maximum rated temperature ¶ 5.3.2.6 Maximum and minimum continuous temperature, current, voltage ¶ 5.3.2.7 Vibration limits ¶ 5.3.2.8 Any other information necessary for safe operation of the EPU	REVISED	(see above)		
		(b)(2) Fuel grade or specification.	5.3.3 EPU ratings are established as applicable and based on the intended duty cycle and the assignment of ratings as defined below, including: ¶ 5.3.3.1 Power, torque, speed, and time for: 5.3.3.2 Rated maximum continuous power ¶ 5.3.3.3 Rated maximum temporary power and associated time limit	REVISED			
		(b)(3) Oil grade or specification.	NOT APPLICABLE OR X-REF TO ESS	REVISED	N/A		
		(b)(4) Temperature of the— (i) Cylinder; (ii) Oil at the oil inlet; and (iii) Turbosupercharger turbine wheel inlet gas.	NOT APPLICABLE	REMOVED			
		(b)(5) Pressure of— (i) Fuel at the fuel inlet; and (ii) Oil at the main oil gallery.	NOT APPLICABLE OR X-REF TO ESS	REVISED	N/A		
		(b)(6) Accessory drive torque and overhang moment.	NOT APPLICABLE	REMOVED			
		(b)(7) Component life.	NOT APPLICABLE	REMOVED			
		(b)(8) Turbosupercharger turbine wheel r.p.m.	NOT APPLICABLE	REMOVED			
		(c) For turbine engines, ratings and operating limitations are established relating to the following: (1) Horsepower, torque, or thrust, r.p.m., gas temperature, and time for— (i) Rated maximum continuous power or thrust (unaugmented); (ii) Rated maximum continuous power or thrust (augmented); (iii) Rated takeoff power or thrust (unaugmented); (iv) Rated takeoff power; (v) Rated 212-minute OEI power; (vi) Rated continuous OEI power; and (vii) Rated 2-minute OEI Power; (ix) Rated 30-second OEI power; and (x) Auxiliary power unit (APU) mode of operation.	NOT APPLICABLE	REMOVED			
		(c)(2) Fuel designation or specification.	NOT APPLICABLE	REMOVED			
		(c)(3) Oil grade or specification.	NOT APPLICABLE	REMOVED			
		(c)(4) Hydraulic fluid specification.	NOT APPLICABLE	REMOVED			
		(c)(5) Temperature of— (i) Oil at a location specified by the applicant; ¶ (ii) Induction air at the inlet face of a supersonic engine, including steady state operation and transient over-temperature and time allowed; ¶ (iii) Hydraulic fluid of a supersonic engine; ¶ (iv) Fuel at a location specified by the applicant; and ¶ (v) External surfaces of the engine, if specified by the applicant.	NOT APPLICABLE	REMOVED			
		(c)(6) Pressure of— (i) Fuel at the fuel inlet; ¶ (ii) Oil at a location specified by the applicant; ¶ (iii) Induction air at the inlet face of a supersonic engine, including steady state operation and transient overpressure and time allowed; and ¶ (iv) Hydraulic fluid.	NOT APPLICABLE	REMOVED			

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		(c)(7) Accessory drive torque and overhang moment.	REMOVED				
		(c)(8) Component life.	REMOVED				
		(c)(9) Fuel filtration.	REMOVED				
		(c)(10) Oil filtration.	REMOVED				
		(c)(11) Bleed air.	REMOVED				
		(c)(12) The number of start-stop stress cycles approved for each rotor disc and spacer.	REMOVED				
		(c)(13) Inlet air distortion at the engine inlet.	REMOVED				
		(c)(14) Transient rotor shaft overspeed r.p.m. and number of overspeed occurrences.	REMOVED				
		(c)(15) Transient gas overtemperature and number of overtemperature occurrences.	REMOVED				
		(c)(16) Transient engine overtorque and number of overtorque occurrences.	REMOVED				
		(c)(17) Maximum engine overtorque for turbopropeller and turboshaft engines incorporating free power turbines.	REMOVED				
		(c)(18) For engines to be used in supersonic aircraft engine rotor windmilling rotational r.p.m.	REMOVED				
		(d) In determining the engine performance and operating limitations, the overall limits or accuracy of the engine control system and/or the necessary instrumentation as defined in §33.5(a)(6) must be taken into account.	REMOVED				
	§33.5 Selection of engine power and thrust ratings.	(a) Requested engine power and thrust ratings must be selected by the applicant.	REMOVED	REC-COPT-004 Power Subsystem Requirements			
			5.10.9 EPU control system electrical power ¶ NOTE: The historic basis for this section was to address the use of aircraft supplied electrical power to the engine control system in addition to the use of a dedicated electrical power source very typically an engine driven permanent magnet alternator (PMA). The aircraft supplied electrical power was most often used as a backup to the PMA electrical power.	REVISED			
			5.3.4 Duty Cycle ¶ 5.3.4.1 Declaration of duty - The intended duty cycle of the EPU sets the framework for establishment of the ratings. There are a number of typical duty cycles used for electric motors. (Per IEC 60034-1) As the duty cycle combined with the rating at that duty cycle establishes the capability and the limits for the EPU use, the manufacturer declares the duty cycle or cycles. These can be based on the manufacturer's intended use for the EPU or may be based on the required duty cycle of the installer. As detailed in IEC 60034-1, multiple duties and their associated ratings may be established to address various operational conditions. The duty may be described by one of the following: ¶ 5.3.4.1.1 numerically, where the load does not vary or where it varies in a known manner; or ¶ 5.3.4.1.2 as a time sequence graph of the variable quantities; or ¶ 5.3.4.1.3 by selecting one of the typical duty types in accordance with IEC 60034-1, Paragraph 4 Duty, that is no less onerous than the expected duty.	REVISED			

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		(b) Each selected rating must be for the lowest power or thrust that all engines of the same type may be expected to produce under the conditions used to determine that rating.		5.3.5 Assignment of rating - The rating, as defined by "set of rated values and operating conditions", shall be assigned by the manufacturer. In assigning the rating the manufacturer shall select one of the classes of rating defined as defined in the IEC 60034-1 Paragraph 5. Ratings. ¶ 5.3.6 Motor Rate Output - The rated output is the mechanical power available at the shaft and shall be expressed in watts (W). ¶ NOTE - It is the practice in some countries for the mechanical power available at the shafts of motors to be expressed in horsepower (1 h.p. is equivalent to 745.7 W, 1 ch (cheval or metric horsepower) is equivalent to 736 W). ¶ 5.3.7 Machines with more than one rating - For machines with more than one rating, the machine shall comply with this document in all respects at each rating. For multi-speed machines, a rating shall be assigned for each speed. When a rated quantity (output, voltage, speed, etc.) may assume several values or vary continuously within two limits, the rating shall be stated at these values or limits. ¶ 5.3.8 Each selected rating must be for the lowest power that all EPUs of the same type may be expected to produce under the conditions used to determine that rating at all times between overhaul periods or other maintenance.	TAILORED	REQ-CEPT-004 Power Subsystem Requirements			
FAR 33. Airworthiness Standards: Aircraft Engines, Subpart B – Design and Construction		... prescribes the general design and construction requirements for reciprocating ... aircraft engines							
	§33.11 Applicability.								
	§33.15 Materials.	Conform to approved specifications (such as industry or military specifications) that ensure their having the strength and other properties assumed in the design data.	5.4 Materials	5.4.1 The materials and components used in the EPU must be established on the basis of industry or military specifications for the intended design conditions of the system. The assumed design values of properties of materials must be suitably related to the minimum properties stated in the material specification. Otherwise, proof of suitability and durability acceptable to the CAA must be established on the basis of tests or other means that ensure their having the strength and other properties assumed in the design data. ¶ 5.4.2 Manufacturing methods and processes must be such as to produce sound structure and mechanisms and electrical systems that retain the design properties under reasonable service conditions. This includes the effects of corrosion.	TAILORED				
	§33.17 Fire protection.	... design and construction of the engine and the materials used must minimize the probability of the occurrence and spread of fire during normal operation and failure conditions, and must minimize the effect of such a fire. ...	5.5 Fire protection	5.5.1 The design and construction of the EPU and the materials used must minimize the probability of the occurrence and spread of fire during normal operation and EPU failure conditions, and must minimize the effect of such a fire. EPU high voltage electrical wiring interconnect systems should be protected against arcing faults. Any non-protected electrical wiring interconnects should be analyzed to show that arcing faults do not cause a hazardous condition. If flammable materials are used or if arcing is probable in the EPU then this constitutes the need for definition of a fire zone on the aircraft level and should be stated as part of the installation instructions. All fire zone protections must be employed.	TAILORED				
	§33.19 Durability.	(a) Engine design and construction must minimize the development of an unsafe condition of the engine between overhaul periods... (b) Each component of the propeller blade pitch control system which is a part of the engine type design must meet the requirements of §§35.21, 35.23, 35.42 and 35.43...	5.6 Durability	5.6.1 EPU design and construction must minimize the development of an unsafe condition of the EPU between maintenance intervals, removal from service or overhaul periods or mandated life defined in the Instructions for Continued Airworthiness as applicable.	TAILORED				

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	§33.21 Engine cooling.	Engine design and construction must provide the necessary cooling under conditions in which the airplane is expected to operate.	5.7 EPU cooling	5.7.1 EPU cooling must be sufficient under all conditions within the declared operational limitations. ¶ 5.7.2 If aspects of the cooling require the installer to ensure that the temperature limits are met, those limits must be specified in the installation manual. ¶ 5.7.3 Instrumentation or sensors must be provided to enable the flight crew or the automatic control system to monitor the functioning of the EPU cooling system unless appropriate inspections are published in the relevant manuals and evidence shows that, ¶ 5.7.3.1 Failure of the cooling system would not lead to hazardous EPU effects before detection, or ¶ 5.7.3.2 Other existing instrumentation or sensors provides adequate warning of failure or impending failure, or ¶ 5.7.3.3 The probability of failure of the cooling system is extremely remote.	TAILORED	CDR Day 1, page 159-162, Nacelle Cooling Analysis. Stated will range, but no test conditions stated.			
	§33.23 Engine mounting attachments and structure.	... maximum allowable limit and ultimate loads for engine mounting attachments and related engine structure must be specified. ...	5.8 EPU mounting attachments and structure	5.8.1 The maximum allowable limit and ultimate load for the integral EPU mounting attachment points and related EPU structure must be specified. ¶ 5.8.2 The EPU mounting attachments and related EPU structure must be able to withstand— ¶ 5.8.2.1 The specified limit loads without permanent deformation; and ¶ 5.8.2.2 The specified ultimate loads without failure, but allowing for permanent deformation. ¶ 5.8.3 If flammable fluids are used within the EPU, the mounts and the mounting features must be demonstrated to be fire proof.	TAILORED	REQ-CEPT-006 Structural Loads Requirements for High-Lift Motor			
	§33.25 Accessory attachments.	The engine must operate properly with the accessory drive and mounting attachments loaded. ...							
	§33.27 Turbine, compressor, fan, and turbosupercharger rotor overspeed.	(a) For each fan, compressor, turbine, and turbosupercharger rotor, the applicant must establish by test analysis, or a combination of both, that each rotor will not burst when operated in the engine for 5 minutes at whichever of the conditions defined in paragraph (b) of this section is the most critical with respect to the integrity of such a rotor. ...			NOT APPLICABLE	REMOVED			

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	§33.28 Engine control systems.	<p>(a) Applicability. These requirements are applicable to any system or device that is part of engine type design, that controls, limits, or monitors engine operation, and is necessary for the continued airworthiness of the engine. ... (b) Validation—(1) Functional aspects. ... (2) Environmental limits. ... (c) Control transitions. ... (d) Engine control system failures. ... (e) System safety assessment. ... (f) Protection systems. ... (g) Software ... (h) Aircraft-supplied data. ... (i) Aircraft-supplied electrical power. ... (j) Air pressure signal. ... (k) Automatic availability and control of engine power for 30-second OEI rating. ... (l) Engine shut down means. ... (m) Programmable logic devices. ...</p>	<p>Note in ASTM WK47374 from F39.05</p> <p>5.10.1 The software and complex electronic hardware, including programmable logic devices, shall be designed and developed using a structured and methodical approach that provides a level of assurance for the logic, that is commensurate with the hazard associated with the failure or malfunction of the systems in which the devices are located, and is substantiated by a verification methodology acceptable to the FAA. ¶ 5.10.2 Applicability. These requirements are applicable to any system or device that controls, limits, monitors or protects EPU operation, and is necessary for the continued airworthiness of the EPU. If items that influence the control, the assumptions with respect to the reliability and functionality of these parts must be clearly stated in the safety analysis (see section 5.18). ¶ 5.10.3 Validation. ¶ 5.10.3.1 Functional aspects. It must be substantiated by tests, analysis, or a combination thereof, that the EPU control system performs the intended functions in a manner which: ¶ 5.10.3.1.1 Enables selected values of relevant control parameters to be maintained and the EPU kept within the approved operating limits over changing atmospheric conditions in the declared light envelope; ¶ 5.10.3.1.2 Complies with the operability requirements of operation and power response tests, as appropriate, under all likely system inputs and allowable EPU power demands, unless it can be demonstrated that failure of the control function results in a non-dispatchable condition in the intended application; ¶ 5.10.3.1.3 Allows modulation of EPU power with adequate sensitivity over the declared range of EPU operating conditions; and ¶ 5.10.3.1.4 Does not create unacceptable power oscillations. ¶ 5.10.3.2 Environmental limits. Environmental limits that cannot be adequately substantiated in accordance with endurance testing must be demonstrated, via EPU system and component tests (see section 5.13). These tests demonstrate that the EPU control system functionality will not be adversely affected by declared environmental conditions, including electromagnetic interference (EMI), High Intensity Radiated Fields (HIRF), and lightning when applicable for the intended use. The limits to which the system has been qualified must be documented in the EPU installation instructions. ¶ 5.10.4 Control transitions. It must be demonstrated that during both normal operation or as a result of fault or failure, changes in one control mode to another, from one channel to another, or from a primary system to a back-up system, the change occurs so that: ¶ 5.10.4.1 The EPU does not exceed any of its operating limitations; ¶ 5.10.4.2 The EPU does not experience any unacceptable operating characteristics or transient exceedances of any limit, potentially leading to unsafe operating conditions. Such non-acceptable operating characteristics include but are not limited to: ¶ 5.10.4.2.1 field excitation at rotor resonance frequency; ¶ 5.10.4.2.2 electromagnetic lock-up (stall); ¶ 5.10.4.2.3 unacceptable power changes or oscillations; ¶ 5.10.4.2.4 other unacceptable characteristics, e.g. electrical arcs, overspeed or overtorque; ¶ 5.10.4.3 There is a means to signal the aircraft to take action or monitor the control transition. The means to alert the aircraft must be described in the EPU installation instructions, and the action or monitoring required must be described in the EPU operating instructions. ¶ 5.10.4.4 The magnitude of any change in power, and the associated transition time must be identified and described in the EPU installation instructions and the EPU operating instructions. ¶ 5.10.5 EPU control system failures. The EPU control system must: ¶ 5.10.5.1 Have a</p>	<p>TAILORED</p>	<p>X-57 Cruise Motor Controller Risk Reduction Test Procedure, PROC-CEPT-005</p>			

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	§33.29 Instrument connection.	(a) Unless it is constructed to prevent its connection to an incorrect instrument, each connection provided for powertrain instruments required by aircraft operation of the engine in compliance with any engine limitation must be marked to identify it with its corresponding instrument. ... (e) The applicant must make provision for the installation of instrumentation necessary to ensure operation in compliance with engine operating limitations. Where, in presenting the safety analysis, or complying with any other requirement, dependence is placed on instrumentation that is not otherwise mandatory in the assumed aircraft installation, then the applicant must specify this instrumentation in the engine approval documentation and declare it mandatory in the engine approval documentation. (f) As part of the System Safety Assessment of §33.29(e), the applicant must assess the possibility and subsequent effect of incorrect fit of instruments, sensors, or connectors. Where necessary, the applicant must take design precautions to prevent incorrect configuration of the system. ...	5.11 Instrument or sensor connection	REQ-CEPT-005 Instrumentation Subsystem Requirements			
	§33.31 Applicability.	... prescribes additional design and construction requirements for reciprocating aircraft engines.		REMOVED			
	§33.33 Vibration.	The engine must be designed and constructed to function throughout its normal operating range of crankshaft rotational speeds, and engine powers without inducing excessive stress in any of the engine parts because of vibration and without imparting excessive vibration forces to the aircraft structure.	5.12 Vibration. The EPU must be designed and constructed to function throughout its normal operating range of rotor speeds and EPU output power without inducing excessive stress in any of the EPU parts because of vibration and without imparting excessive vibration forces to the aircraft structure. In addition to historical sources of vibration such as aero-dynamic excitation, analysis of rotating component resonance induced by field-excitation, should also be assessed.	X-57 Cruise Motor Controller Risk Reduction Vibration & Shock Test Procedure, PROC-CEPT-006			
	§33.34 Turbocharger rotors.	Each turbocharger case must be designed and constructed to be able to contain fragments of a compressor or turbine that fails at the highest speed that is obtainable with normal speed control devices inoperative.	NOT APPLICABLE	REMOVED			
	§33.35 Fuel and Induction system.	(a) The fuel system of the engine must be designed and constructed to supply an appropriate mixture of fuel to the cylinders throughout the complete operating range of the engine under all flight and atmospheric conditions. ...	NOT APPLICABLE OR X-REF TO ESS	REMOVED			N/A or revised for battery bay?
	§33.37 Ignition system.	Each spark ignition engine must have a dual ignition system with at least two spark plugs for each cylinder and two separate electric circuits with separate sources of electrical energy or have an ignition system of equivalent in-flight reliability.	NOT APPLICABLE	REMOVED			

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	§33.39 Lubrication system.	(a) The lubrication system of the engine must be designed and constructed so that it will function properly in all flight attitudes and atmospheric conditions in which the airplane is expected to operate. In wet sump engines, this requirement must be met when only one-half of the maximum lubricant supply is in the engine. ¶ (b) The lubrication system of the engine must be designed and constructed to allow installing a means of cooling the lubricant. ¶ (c) The crankcase must be vented to the atmosphere to preclude leakage of oil from excessive pressure in the crankcase.	5.16 Lubrication System. The lubrication system of the EPU must be designed and constructed so that it will function properly in all flight attitudes and atmospheric conditions in which the aircraft is expected to operate.	TAILORED	GET			
FAR 33. Airworthiness Standards: Aircraft Engines, Subpart D –Block Tests; Reciprocating Aircraft Engines								
	§33.41 Applicability.	... prescribes the block tests and inspections for reciprocating aircraft engines.	5.13 EPU system and component tests	TAILORED				
	§33.42 General.	Before each endurance test required by this subpart the adjustment setting and functioning characteristic of each component having an adjustment setting and a functioning characteristic that can be established independent of installation on the engine must be established and recorded.	5.13 EPU system and component tests	TAILORED				

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	§33.43 Vibration test.	<p>(a) Each engine must undergo a vibration survey to establish the torsional and bending vibration characteristics of the crankshaft and the propeller shaft or other output shaft, over the range of crankshaft speed and engine power, under steady state and transient conditions, from idling speed to either 110 percent of the desired maximum continuous speed rating or 103 percent of the maximum desired takeoff speed rating, whichever is higher. The survey must be conducted using, for airplane engines, the same configuration of the propeller type which is used for the endurance test, and using, for other engines, the same configuration of the loading device type which is used for the endurance test. (b) The torsional and bending vibration stresses of the crankshaft and the propeller shaft or other output shaft may not exceed the endurance limit stress of the material from which the shaft is made. If the maximum stress in the shaft cannot be shown to be below the endurance limit by measurement, the vibration frequency and amplitude must be measured. The peak amplitude must be shown to produce a stress below the endurance limit; if not, the engine must be run at the condition producing the peak amplitude until, for steel shafts, 10 million stress reversals have been sustained without fatigue failure and, for other shafts, until it is shown that fatigue will not occur within the endurance limit stress of the material. (c) Each accessory drive and mounting attachment must be loaded, with the loads imposed by each accessory used only for an aircraft service being the limit load specified by the applicant for the drive or attachment point. (d) The vibration survey described in paragraph (a) of this section must be repeated with that cylinder not firing which has the most adverse vibration effect, in order to establish the conditions under which the engine can be operated safely in that abnormal state. However, for this vibration survey, the engine speed range need only extend from idle to the maximum desired takeoff speed, and compliance with paragraph (b) of this section need not be shown.</p>	<p>Note in ASTM WK47374 from F39.05</p> <p>5.20.3.1 Each EPU must be analyzed to establish that the vibration characteristics of those components that may be subject to mechanically or aerodynamically induced vibratory excitations are acceptable throughout the declared flight envelope. At a minimum, the torsional and bending vibration characteristics of the propeller or fan shaft, over the range of propeller or fan shaft speed and propeller or fan power, under steady state and transient conditions, from the minimum shaft speed that the control system can command during operation to a shaft speed that exceeds the maximum desired speed rating by a sufficient margin to determine the maximum vibratory stresses must be established. This margin must be justified using analytical means, prior experience, or empirical data as applicable. The EPU test must be conducted using, for airplane EPUs, the same configuration of the propeller or fan which is used for the endurance and durability test, and using, for other EPUs, the same configuration of the loading device type which is used for the endurance and durability test. § 5.20.3.2 The EPU test shall cover the ranges of power for each rotating component system, corresponding to operations throughout the range of ambient conditions in the declared flight envelope, from the minimum obtainable rotational speed that can be commanded by the control system up to 103 percent of the maximum rotational speed permitted for rating periods of two minutes or longer, and up to 100 percent of all other permitted rotational speeds, including those that are overspeeds. If there is any indication of a stress peak arising at the highest of those required rotational speeds, the EPU test shall be extended sufficiently to reveal the maximum stress values present, except that the extension need not cover more than a further 2 percentage points increase beyond those speeds. § 5.20.3.3 Except as provided by paragraph 5.20.3.4 of this section, the vibration stresses associated with the vibration characteristics determined under this section, when combined with the appropriate steady state stresses, must be less than the endurance limits of the materials concerned, after making due allowances for operating conditions for the permitted variations in properties of the materials. The suitability of these stress margins must be justified for each part evaluated. If the maximum stress in the shaft cannot be shown to be below the endurance limit by measurement, the vibration frequency and amplitude must be measured. The EPU must be run at the condition producing the peak amplitude for a number of stress reversals sufficient to ensure that fatigue failure will not occur in service. Alternatively, the EPU may be run at a condition producing peak amplitude until 10 million stress reversals have been sustained without fatigue failure for steel shafts and, for other shafts, until it is shown that fatigue will not occur within the endurance limit stress of the material. If it is determined that certain operating conditions, or ranges, need to be limited, operating and installation limitations shall be established. Operating and installation limitations shall be established for shafts made from materials that do not have endurance limits. § 5.20.3.3.1 The purpose of this discussion is defined as follows: "Endurance limit- infinite number of cycles without material fatigue failure. To demonstrate endurance limit for metallic materials, 10⁷ cycles have generally been accepted as the test proxy for an "infinite" number of cycles. The endurance limit depends on the steady-state stresses, temperatures, and other factors. § 5.20.3.4 The effects on vibration characteristics of excitation forces caused by fault conditions (such as, but not limited to, out of balance rotating components, local airflow blockage,</p>	<p>REVISED</p>	<p>Validation Method, X-57 Mod I</p>	<p>Validation Method, X-57 Mod II ANLYS-CEPT-009 Mod II Flutter Analysis</p>	<p>Validation Method, X-57 Mod IV</p>

Subpart	Section	Note	ASTM F39.05 WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, ITEM 2, EPU WK4 7374_v2.pdf, Dated 31 July 2018, in revision. (https:// compass.astm.org/ CUSTOMERS/ COLLABFILES/ 10518620180605_WK4 GROUP.pdf)	Note in ASTM WK47374 from F39.05	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod III	Validation Method, X-57 Mod IV
	\$33.45 Calibration tests.	(a) Each engine must be subjected to the calibration tests necessary to establish its power characteristics and the conditions for the endurance test specified in §33.49. The results of the power characteristics calibration tests form the basis for establishing the characteristics of the engine over its entire operating range of crankshaft rotational speeds, altitudes, pressures, fuel/air mixture settings, and manifold. Power ratings are based upon standard atmospheric conditions with only those accessories installed which are essential for engine functioning. ¶ (b) A power check at sea level conditions must be accomplished on the endurance test engine after the endurance test. Any change in power characteristics which occurs during the endurance test must be determined. Measurements taken during the final portion of the endurance test may be used in showing compliance with the requirements of this paragraph.	5.20.6 Calibration tests	5.20.6.1 Each EPU must be subjected to those calibration tests necessary to establish its power characteristics and the conditions for the endurance and durability test specified in this section. The results of the power characteristics calibration tests form the basis for establishing the characteristics of the EPU over its entire operating range of speeds, torques, and ambient conditions. ¶ 5.20.6.2 A power check must be accomplished on the endurance and durability test EPU after the endurance and durability test which occurs during the endurance and durability test must be determined. Measurements taken during the final portion of the endurance and durability test may be used in showing compliance with the requirement of this paragraph. ¶ 5.20.6.3 In showing compliance with this paragraph, each condition must stabilize before measurements are taken.	REVISED	ANLYS-CEPT-018 X-57 Cruise Motor and High Lift Motor Mission Profile Power Requirements Analysis			
	\$33.47 Detonation test.	Each engine must be tested to establish that the engine can function without detonation throughout its range of intended conditions of operation.		NOT APPLICABLE	REMOVED				
	\$33.49 Endurance test.	(a) General. Each engine must be subjected to an endurance test that includes a total of 150 hours of operation (except as provided in paragraph (e)(1)(iii) of this section) and, depending upon the type and contemplated use of the engine, consists of one of the series of runs specified in paragraphs (b) through (e) of this section, as applicable. The runs must be made in the order found appropriate ... for the particular engine being tested. During the endurance test the engine power and the crankshaft rotational speed must be kept within ±3 percent of the rated values. During the runs at rated takeoff power and for at least 35 hours at rated maximum continuous power, one cylinder must be operated at not less than the limiting temperature, the other cylinders must be operated at a temperature not lower than 50°F, below the limiting temperature, and the oil inlet temperature must be maintained within ±10°F of the limiting temperature. An engine that is equipped with a propeller shaft must be fitted for the endurance test with a propeller that thrust-loads the engine to the maximum thrust which the engine is designed to resist at each applicable operating condition specified in this section. Each accessory drive and mounting attachment must be loaded. During operation at rated takeoff power and rated maximum continuous power, the load imposed by each accessory used only for an aircraft service must be the limit load specified by the applicant for the engine drive or attachment point. ¶ (b) Unsupercharged engines and engines incorporating a gear-driven single-speed supercharger. ... ¶ (c) Engines incorporating a gear-driven two-speed supercharger. ... ¶ (d) Helicopter engines. ... ¶ (e) Turbosupercharged engines. ...	5.20.2 Endurance and durability test	5.20.2.1 An endurance and durability test of sufficient duration must show that the development of an unsafe condition is extremely remote between overhaul periods (or during the life of the EPU if no overhaul intervals are prescribed) and loss of power control is below 10 ^{0.5} flight hour. The test time duration, number of cycles, and test schedule definition should provide sufficient demonstration of durability with regard to the failure modes that could result in major EPU effects or hazardous EPU effects. The test schedule must be justified using validated analytical methods, empirical testing, or experience with EPU or motors with comparable design. During the endurance test the EPU power and the output shaft rotational speed must be demonstrated at or above 100% of the rated values. An EPU that is intended to drive a propeller that is type certificated separately from the EPU must be fitted for the endurance and durability test with a propeller that thrust-loads the EPU to the maximum thrust which the EPU is designed to resist at each applicable operating condition specified in this section. The endurance and durability test must be run on an EPU representative of the type design. Any deviation to the type design must be recorded. It must be justified that any of the recorded deviations to the type design does not affect the results of the test. ¶ 5.20.2.2 The endurance and durability test must consist of at least the following elements: ¶ 5.20.2.2.1 A run consisting of alternate periods of operation at rated takeoff power and the minimum power and the minimum power, that can be commanded by the control system during operation. ¶ 5.20.2.2.2 A series of runs consisting of alternate periods of operation at maximum continuous power and successively lower power settings. The range of power settings should be selected to expose any deleterious system responses or vibration. ¶ 5.20.2.2.3 Each period of operation discussed in this section must be conducted at stabilized values for rotational speed, torque, temperature and any other parameter deemed to ensure the safety of the EPU to achieve steady state values. At the ratings and duty cycles established in conjunction with section 5.3 of this standard, the stabilized temperature for the motor and the motor controller must be equal to or greater than the temperature associated with this rating.	REVISED	#1- SPEC-CEPT-001, p.20, §5.4 Endurance Testing, with some thrust-loads to the max thrust & drag ... however time required for each condition will be reduced by half (but still 150-hour test); #2- CDR Day 2, page 194, Airvolt Cruise Motor Endurance Test — concern expressed over time to test to FAR33; CDR Day 2, page 198, Airvolt X-57 test Plan — Perform Endurance Test; CDR Day 2, page 200, Need COPY of ANLYS-CEPT-005 "Airvolt - FAR Part 33 Aircraft Engine applicability" document released == See ASTM F39.05 §5:20.2 also == #3-Cruise Motor Endurance Test Procedure, PROC-CEPT-010			

Subpart	Section	Note	ASTM F39.05 WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, ITEM 2, EPU WK4 7374_v2.pdf Dated 31 July 2018, in revision. (https://compass.astm.org/CUSTOMERS/COLLABFILES/10916620180605_WK47374.pdf)	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod III	Validation Method, X-57 Mod IV
	§33.51 Operation test.	... operation test must include the testing ... to demonstrate backfire characteristics, starting, idling, acceleration, overspeeding, functioning of propeller and ignition, and any other operational characteristic of the engine. If the engine incorporates a multispool supercharger drive, the design and construction must allow the supercharger to be shifted from operation at the lower speed ratio to the higher and the power appropriate to the manifold pressure and speed settings for rated maximum continuous power at the higher supercharger speed ratio must be obtainable within five seconds.	5.20.7 Operation test.	REVISED	Propulsion System Functional Test Procedure, PROC-CEPT-028			
	§33.53 Engine system and component tests.	(a) For those systems and components that cannot be adequately substantiated in accordance with endurance testing of §33.49, the applicant must conduct additional tests to demonstrate that systems or components are able to perform the intended functions in all declared environmental and operating conditions. ¶ (b) Temperature limits must be established for each component that requires temperature controlling provisions in the aircraft installation to assure satisfactory functioning, reliability, and durability.	5.20.2 Endurance and durability test	TAILORED				
	§33.55 Teardown inspection.	After completing the endurance test— ¶ (a) Each engine must be completely disassembled, ¶ (b) Each component having an adjustment setting and a functioning characteristic that can be established independent of installation on the engine must retain each setting and functioning characteristic within the limits that were established and recorded at the beginning of the test, and ¶ (c) Each engine component must conform to the type design and be eligible for incorporation into an engine for continued operation, in accordance with information submitted in compliance with §33.4.	5.22 Teardown Inspection	REVISED	PROC-CEPT-017 JMX57K Motor to Airvolt Installation Procedure			
		... operation test must include the testing ... to demonstrate backfire characteristics, starting, idling, acceleration, overspeeding, functioning of propeller and ignition, and any other operational characteristic of the engine. If the engine incorporates a multispool supercharger drive, the design and construction must allow the supercharger to be shifted from operation at the lower speed ratio to the higher and the power appropriate to the manifold pressure and speed settings for rated maximum continuous power at the higher supercharger speed ratio must be obtainable within five seconds.	5.20.7 Operation test.	REVISED				
		... operation test must include the testing ... to demonstrate backfire characteristics, starting, idling, acceleration, overspeeding, functioning of propeller and ignition, and any other operational characteristic of the engine. If the engine incorporates a multispool supercharger drive, the design and construction must allow the supercharger to be shifted from operation at the lower speed ratio to the higher and the power appropriate to the manifold pressure and speed settings for rated maximum continuous power at the higher supercharger speed ratio must be obtainable within five seconds.	5.20.7 Operation test must include testing to demonstrate, ¶ 5.20.7.1 Powering on, idling, acceleration, overspeeding, with loading, representative of the intended installation; ¶ 5.20.7.1.2 Compliance with the EPU response requirements of paragraph 5.20.8.1; ¶ 5.20.7.1.3 That the EPU has safe operating characteristics throughout its specified operating envelope. The evaluation should include an assessment of thermal and electrical system performance since certain attributes have temperature and altitude dependencies. For the electrical system this would include failure inducing phenomena such as: partial discharge, corona arcing, and dielectric breakdown.	REVISED				
		After completing the endurance test— ¶ (a) Each engine must be completely disassembled, ¶ (b) Each component having an adjustment setting and a functioning characteristic that can be established independent of installation on the engine must retain each setting and functioning characteristic within the limits that were established and recorded at the beginning of the test, and ¶ (c) Each engine component must conform to the type design and be eligible for incorporation into a EPU for continued operation, in accordance with information submitted in compliance with the instructions for continued airworthiness. ¶ 5.22.1.4 If the EPU is assembled in a manner that it cannot be disassembled without destructive inspection, such as one that is epoxied together, and it will be non-workable after tear down, alternative inspection can be proposed. There may be non-destructive tests for electrical systems. However, these alternative methods must capture the critical aspects intended for the inspection. Pre-measurements at build must be referenced at teardown. ¶ 5.22.1.5 If a teardown is not performed, then the life limit of the EPU will be established by the length of the endurance test performed.	5.22.1 After completing the endurance test, the vibration test, the overtorque test, and the overtemperature test— ¶ 5.22.1.1 Each EPU must be completely disassembled; ¶ 5.22.1.2 Each EPU component having an adjustment setting and a functioning characteristic that can be established independent of installation on or in the EPU must retain each setting and functioning characteristic within the limits that were established and recorded at the beginning of the test; and ¶ 5.22.1.3 Each EPU component must conform to the type design and be eligible for incorporation into a EPU for continued operation, in accordance with information submitted in compliance with the instructions for continued airworthiness. ¶ 5.22.1.4 If the EPU is assembled in a manner that it cannot be disassembled without destructive inspection, such as one that is epoxied together, and it will be non-workable after tear down, alternative inspection can be proposed. There may be non-destructive tests for electrical systems. However, these alternative methods must capture the critical aspects intended for the inspection. Pre-measurements at build must be referenced at teardown. ¶ 5.22.1.5 If a teardown is not performed, then the life limit of the EPU will be established by the length of the endurance test performed.	REVISED				

Subpart	Section	Note	ASTM F39.05 WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, ITEM 2, EPU WK4 7374.v2.pdf, Dated 31 July 2018, in revision. (https:// compass.astm.org/ collab/files/ 10218620180605_WK47374.pdf)	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod III	Validation Method, X-57 Mod IV
	<p>\$33.57 General conduct of block tests.</p>	<p>Note</p> <p>(a) The applicant may, in conducting the block tests, use separate engines of identical design and construction in the vibration, calibration, detonation, endurance, and operation tests, except that, if a separate engine is used for the endurance test it must be subjected to a calibration check before starting the endurance test. ¶ (b) The applicant may service and make minor repairs to the engine during the block tests in accordance with the service and maintenance instructions submitted in compliance with §33.4. If the frequency of the service is excessive, or the number of stops due to engine malfunction is excessive, or a major repair, or replacement of a part is found necessary during the block tests or as the result of findings from the teardown inspection, the engine or its parts may be subjected to any additional test... ¶ (c) Each applicant must furnish all testing facilities, including equipment and competent personnel, to conduct the block tests.</p>	<p>5.20.1 General conduct of EPU tests</p>	<p>REVISED</p>	<p>PROC-CEPT-017 JMX57K Motor to Airvolt Installation Procedure</p>			
			<p>Note in ASTM WK47374 from F39.05</p> <p>5.20.1.1 In conducting a EPU test, separate EPUs of identical design and construction may be used in the vibration, calibration, endurance, and operation tests, except that, if a separate EPU is used for the endurance test it must be subjected to a calibration check before powering on the endurance test. ¶ 5.20.1.2 Service and minor repairs to the EPU may be made during the tests in accordance with the service and maintenance instructions submitted in the instructions for Continued Airworthiness. If the frequency of the service is excessive, or the number of stops due to EPU malfunction is excessive, or a major repair, or replacement of a part is found necessary during the block tests or as the result of findings from the teardown inspection, the EPU or its parts must be subjected to any additional tests the CAA finds necessary. ¶ 5.20.1.3 The following are a set of baseline tests. These may be used to form a test sequence and can be accomplished as a combination of test conditions for a sequential test or they may be used individually. ¶ 5.20.1.4 Upon conclusion of tests conducted to show compliance with this section, each EPU part or individual groups of components must meet the requirements of the teardown inspection (see 5.22). It should be considered what the ramifications are of findings during teardown. If the tests have been run as a combination sequence and there are findings in teardown it may not be clear which particular test was the source of the finding. This will have to be resolved.</p>					

Table A-3, Proposed Compliance Matrix (PCM) for 14 CFR 35 as Test Matrix for X-57

Subpart	Section	Note	ASTM F39.05, WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, ITEM 2, EPU WK47374_v2.pdf Dated 31 July 2018, in compass.astm.org/CUSTOMERS/COLLAB/FILES/10514620180905_WK47374.pdf	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod III	Validation Method, X-57 Mod IV
14 CFR 35, Dated 3 October 2018, (https://www.ecfr.gov/cgi-bin/retrieveECER?&n=pt1.1.35)								
FAR 35, Airworthiness Standards: Propellers, Subpart A—General								
	\$35.1 Applicability.	... prescribes airworthiness standards for the issue of type certificates and changes to those certificates, for propellers		UNCHANGED				
	\$35.2 Propeller configuration.	... a list of all the components, including references to the relevant drawings and software design data, that define the type design of the propeller to be approved....		UNCHANGED				
	\$35.3 Instructions for propeller installation and operation.			UNCHANGED				
	\$35.4 Instructions for Continued Airworthiness.			UNCHANGED				
	\$35.5 Propeller ratings and operating limitations.			UNCHANGED				
	\$35.7 Features and characteristics.	... The propeller may not have features or characteristics, revealed by any test or analysis or known to the applicant, that make it unsafe for the uses for which certification is requested.		UNCHANGED				
FAR 35, Airworthiness Standards: Propellers, Subpart B—Design and Construction								
	\$35.15 Safety analysis.	... analyze the propeller system to assess the likely consequences of all failures that can reasonably be expected to occur....		UNCHANGED				
	\$35.16 Propeller critical parts.	The integrity of each propeller critical part identified by the safety analysis....		UNCHANGED				
	\$35.17 Materials and manufacturing methods.			UNCHANGED				
	\$35.19 Durability.	Each part of the propeller must be designed and constructed to minimize the development of any unsafe condition of the propeller between overhaul periods.		UNCHANGED				
	\$35.21 Variable and reversible pitch propellers.			UNCHANGED				

Subpart	Section	Note	ASTM F39.05 WK47374 Design of Electric Propulsion Units for General Aviation Aircraft, DRAFT STANDARD, ITEM 2, EPU WK47374 v2.pdf Dated 31 July 2018, in revision. (https://compass.astm.org/CUSTOMERS/COLLABFILES/10518620180605_WK47374EPU.pdf)	Note in ASTM WK47374 from F39.05	Assessment of Applicability	Validation Method, X-57 Mod I	Validation Method, X-57 Mod II	Validation Method, X-57 Mod III	Validation Method, X-57 Mod IV
	\$35.22 Feathering propellers.		5.24 EPU-variable pitch propeller or fan systems tests	<p>5.24.1 These are functional tests of the EPU operation, not an endurance test, to be conducted as applicable for a variable pitch design. If the EPU is designed to operate with a propeller or fan that is not part of the EPU type design, then the following tests must be conducted with a representative propeller or fan installed by either including the tests in the endurance run or otherwise performing them in a manner acceptable to the FAA: § 5.24.1.1 Feathering operation: The propeller should be feathered a sufficient number of times to establish reliable operation of the EPU in the propeller feathering dynamic operation. In absence of other justified number of sufficient test cycles, a minimum of 25 cycles may be used. § 5.24.1.2 Negative torque and thrust system operation: The negative torque and thrust system should be tested from rated maximum continuous power or from the most critical condition a sufficient number of times to establish reliable operation of the EPU in the negative torque and thrust system dynamic operation. In absence of other justified number of sufficient test cycles, a minimum of 25 cycles may be used. It should be shown by test that the negative torque effect on the EPU during windmill operation will not adversely affect bearing lubrication system § 5.24.1.3 Reverse thrust operation: The reverse thrust operation should be tested from the least power position to full reverse for a number of cycles sufficient to establish the reliability of the EPU in the dynamic operation of the reverse thrust system. In absence of other justified number of sufficient test cycles, a minimum of 175 cycles may be used. The reverse thrust operation at rated maximum continuous power from full forward to full reverse thrust for a number of cycles sufficient to establish the reliability of the reverse thrust system should also be tested. In absence of other justified number of sufficient test cycles, a minimum of 25 cycles may be used. At the end of each cycle the propeller or fan must be operated in reverse pitch for a time interval sufficient to establish the reliability of the reverse pitch mechanism and must occur at the maximum rotational speed and power specified for reverse pitch operation. In absence of other justified time interval, a minimum of 30 seconds may be used.</p>	REVISED			ANLYS-CEPT-018 X-57 Cruise Motor and High Lift Motor Mission Profile Power Requirements Analysis: TP- CEPT-004, High Lift Motor Controller Test Plan, SPEC- CEPT-006 SCEPTOR High-Lift Propeller Specification	ANLYS-CEPT-018 X-57 Cruise Motor and High Lift Motor Mission Profile Power Requirements Analysis: TP- CEPT-004, High Lift Motor Controller Test Plan, SPEC- CEPT-006 SCEPTOR High-Lift Propeller Specification
	\$35.23 Propeller control system.				UNCHANGED				
	\$35.24 Strength.		The maximum stresses developed in the propeller may not exceed values acceptable...		UNCHANGED				
FAR 35, Airworthiness Standards: Propellers, Subpart C – Tests and Inspections	\$35.33 General.		Each applicant must furnish test article(s) and suitable testing facilities, including equipment and competent personnel, and conduct the required tests...		UNCHANGED				
	\$35.34 Inspections, adjustments and repairs.				UNCHANGED				
	\$35.35 Centrifugal load tests.		demonstrate that a propeller complies with paragraphs (a), (b) and (c) of this section without evidence of failure, malfunction, or permanent deformation that would result in a major or hazardous propeller effect. When the propeller could be sensitive to environmental degradation in service, this must be considered (... not applicable to fixed-pitch wood or fixed-pitch metal propellers of conventional design.)		UNCHANGED				

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14. ABSTRACT
This report describes a generic method for addressing any new technology to its associated set of regulations and certification criteria. The result is a framework under which a detailed assessment can be conducted. Using just such a framework, the report maps the detailed updated regulations and evolving ASTM standards to the particular technology planning and tests. As a result, a roadmap of NASA technology is documented that shows clear transfer of technology data to industry (standards developers, as well as technology developers) and the FAA regulatory policy and certification staff upon whom certification and policy will be data-driven. A clear description of benefits and gaps are identified, as well.

15. SUBJECT TERMS

X-57; certification; distributed; electric; propulsion; standards

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