Comments for revision to Material Qualification and Equivalency 03/19

Page 5 - 3.1.1 Number of Specimens
I suggest adding the following qualification:

A-basis allowables based on reduced sampling may be accepted by the certifying authority in certain circumstances. For example, a design may require A-basis allowables for only one component with all other components requiring B-Basis values. In this case, the OEM with ACO concurrence might elect to accept the lower A-basis number based on reduced sampling rather than conducting robust sampling.

Page 8 – 3.1.8 Strain Gage Bonding

I suggest changing this to Strain Gage/Extensometer Usage and adding a bullet that recommends extensometers when gage area is less than 3 repetitive patterns of the weave.

Page 9 – 3.1.9 Specimen Dimensioning and Inspection

applicable national organization standards should be applicable national standards organization

Page 36 – Table 5 & Table 6

Change Jet Fuel (JP-4) to Jet Fuel (JP-4) and/or Avgas Most small planes are still piston engine powered and use avgas and not jet fuel. Avgas is likely to be slightly more critical.

Page 53 – use of 4% COV when actual COV is less than 4% is controversial. Do we want to adopt that position?