

## AEEC SAI Timely Recovery of Flight Data (TRFD) Meeting #9

**Date:** 13-15 November 2019

**Location:** Washington, DC USA

Please send any corrections or additions to Greg Moran.

### Agenda:

- Review action items.
- Review any updates to requirements study (section 2)
  - New EASA NPAs, affecting sections 2.3.10, 2.4.2.3 – other?
  - ICAO Doc10054 first edition 2019
  - ICAO Annex 13 & Doc9756 discussion
- Review architecture studies (section 3)
  - Automatic deployable flight recorder
  - Transmission of flight data

### Discussion:

#### Organization

TRFD deliverables and schedule are as discussed in APIM 17-005 section 5.1. Our goal to generate a draft report addressing phases 1 & 2 in time for discussion at the Hawaii meeting, ahead of the APIM schedule.

Activity	Start Date	Completion Date
Phase 1: document the end-to-end system requirements	June, 2018	December, 2018
i. Define TRFD requirement source documents (ICAO SARP, industry standard, regulation) <a href="#">COMPLETE 13 June 2018</a>		
ii. Define TRFD functional block diagram <a href="#">COMPLETE 13 June 2018</a>		
iii. Capture requirements and recommendations from source documents <a href="#">COMPLETE 15 January 2019</a>		
iv. Identify any additional requirements and recommendations <a href="#">COMPLETE 18 December 2018</a>		
v. Allocate requirements and recommendation to functional blocks <a href="#">COMPLETE 15 January 2019</a>		
vi. Develop section 2 of the report <a href="#">IN WORK June 2019</a>		
Phase 2: develop candidate architectures and select architecture(s)	January, 2019	December, 2019
i. Develop candidate architectures for ADFR and TFD <a href="#">COMPLETE 24 August 2018</a>		
ii. Develop section 3 of the report <a href="#">IN WORK ECD December 2019</a>		
Phase 3: develop detailed equipment interface, and aircraft installation requirements, as well as ground system requirements	January, 2020	September, 2020
<a href="#">Re-evaluate schedule early 2020.</a>		

Completion of phase 1 December, 2018 and phase 2 December, 2019 supports requirements & architecture report (phase 1 and 2) March, 2020. Phase 3 completion September, 2020 may need to be

adjusted based on characteristic and/or specifications recommended in requirements and architectures report. TRFD team preference to extend due date as TRFD is a new type certification mandate rather than the ADT forward-fit mandate, and ADT phase 3 took longer than 9 months.

## *SharePoint*

- Meeting and teleconference minutes at *681 Input\7.) Meetings and Teleconferences*
- References at *681 Input\2.) References*
- Requirements at *681 Input\3.) Requirements*
- 681 report drafts and revision process at *681 Input\8.) TRFD Requirements and Architectures Report*
- 680 reports for reference / comparison at *680 Input\04.) ADT Requirements and Architectures Report*

## *Technical*

### **Requirements**

EASA TBD NPA, which had an ECD of October, 2019, has not yet occurred for location of point of end of flight. The group will react to update requirements and recommendations once EASA releases the NPA, if it is prior to the release of our report.

FAA plans write an AC for normal tracking, ADT and TRFD by the end of 2020. They prefer to obtain input from industry on writing the AC prior to release. The planned FAA AC could be added to the TRFD requirements table; however the group prefer to note the planned FAA AC without evaluating within the report until it is released.

There were no other new requirements documents identified.

Greg Moran raised thirteen (13) consistency / clarification items raised to ICAO flight recorder specific working group regarding TRFD and ICAO Doc10054. ICAO noted the input for future reference has no plan for a revision to ICAO Doc10054. Attachment 2 contains the thirteen (13) items originally raised to ICAO with two potential new items identified during this meeting:

- **Prioritization of historical and real-time data download as a function of historical data download rate.**
- **Data protection guidance may be missing for cases where CVR and AIR/FCMIR are transmitted when not associated with functions listed in Annex 6, 13 or 19.**

### **Transmission of Flight Data Architecture Study**

Figure 5 is the general TRFD functional block diagram assignment. Figure 10 TFD functional block diagram needs to be customized for this architecture as was done for ADFR (action for Miro).

When example (candidate) architectures are discussed with specific protocols listed, a sentence should be added to clarify that these are examples only and not meant to be prescriptive.

Greg S. pointed out his concerns with only transmitting FDR mandatory only being difficulty in decoding this data frame variant relative to the full data frame. Paul P. indicated that ARINC typically goes above and beyond the minimum safety requirements and so suggested that this aspect be considered within the analysis & recommendations.

Hannes requested that we clarify transmission of Design Assurance Level (DAL) E Airplane Condition Monitoring System (ACMS) / Quick Access Recorder (QAR) data, possibly rather than DAL D FDR data,

within our report. Currently this section lists 'FDR' ARINC 717 data. ICAO Doc10054 discusses the flight recorder data being the same as what is provided to fixed recorders. DAL E ACMS / QAR is understood to be priority 7 in the ICAO Doc10054 Table 3-2, other data an operator may voluntarily elect to transmit.

There are implications of DAL on the TRFD system: if DAL D is applied across the system, this could have implications for the connectivity system:

- Can DAL E ACMS / QAR data be used to satisfy TRFD requirements? The data could be the same as sent to the flight recorders.
- Can DAL E connectivity services be used to satisfy TRFD? Doc10054 allows the use of commercial connectivity services. IFE systems being DAL E would be load-shed more easily than higher DAL systems; can these be used if available? Doc10054 includes 'The robustness of the power supply to the flight recorder data recovery system installed on the aeroplane is expected to be of the same level as for operation of the fixed crash-protected flight recorder system.'

ICAO Doc10054 did not provide an estimate for the bandwidth required to transmit the flight crew audio channels, where silence editing may be employed. The group felt that it was too difficult to estimate the percentage of time the flight crew may be speaking, and that any percentage included may be construed to be a design goal which wouldn't be the case. The worst-case bandwidth estimate was provided with three flight crew audio channels and no silence editing employed.

New content was provided to define 'real time' and 'historical' terms, and the rationale for the prioritization (insufficient bandwidth), separating into continuous and triggered transmission with cumulative bandwidth.

The group discussed how to reconcile prioritization against bandwidth allocation for historical data when triggered transmission is used. The table currently assumes (not stated) 1:1 historical download speed, but this could be higher (e.g. 5:1, 20:1). Should for example priority 3 consume all available bandwidth to transmit 20 minutes of historical audio instead of priority 4 & lower. Bill provided content regarding commutation for inclusion into the data transport section.

It was noted that application of encryption, as required by ICAO Doc10054 for certain data types, will increase required data rate and should be mentioned in the report.

Greg Moran presented new content on 3.2.3.2 Detect Start Condition reviewed by the group. 3.2.7 Key Airplane Infrastructure Support and Required Changes was already prepared but not reviewed at this meeting.

The historical data download rate In section 3.2.3.1 this needs to be described in terms of expectations – is 1:1 acceptable? Is 4:1 expected? Should there be a minimum or maximum? The major issue is should historical download out prioritize real-time download? If ICAO does not provide guidance, then ARINC 681 report could recommend that an industry standard be developed to address this aspect.

Hannes and Greg Smith discussed ICAO Annex 13 & Doc9756. The existing verbiage in section 2 for these document was deemed sufficient and will be revised if either document is revised prior to the release of this report.

The following TFD subsections are identified as needing additional content following this meeting. The content author and review status during this meeting is listed below:

- 3.2.3.3 *Data Transport* – Ruben
- 3.2.3.4 *Off Airplane Storage* – Greg Smith & John Fisher (introduction)
- 3.2.3.5 *Data Recovery* – Hannes (reviewed preliminary content)
- 3.2.4 *Detailed Flow and Function Decomposition* - Miro
- 3.2.6 *Key Performance Characteristics* – Miro (reviewed preliminary content)
- 3.2.8 *Key Network Infrastructure and Ground Segment Support* - Miro
- 3.2.9 *Key Changes to Support the Analyzed Architecture* – Greg Moran

ADFR *Key Performance Characteristics* section appears to be more in the *Compliance with Requirements and Recommendations* rather than *Key Performance Characteristics*.

*Up-coming schedule:*

Teleconferences to be scheduled approximately every 3 weeks:

- Teleconference 19 December 3, 2019 *scheduled*
- Teleconference 20 January 8, 2020 *scheduled*
- Teleconference 21 January 29, 2020 *scheduled*

February

- Face-to-face meeting Coral Gables February 10-12, 2020

**Actions:**

Open -

ID	Action	Assigned	ECD
190226-C	Editorial: move document references not included in requirements table to appendix	John Fisher	TBD
190605-A	Review EASA NPA 2019-06 for ETSO (FDR, CVR, DLR, AIR, ADFR, NRLB, RLB, ELT) impact to TRFD (John), and revise discussion as needed if ETSO requirements are above that of ED-112A (Blake).	John Fisher & Blake	<del>03 July 2019</del> <del>31 July 2019</del> <del>28 Aug 2019</del> <del>9 Oct 2019</del> <del>13 Nov 2019</del> 3 Dec 2019
190617-D	Editorial: ARINC 681 key term is 'location of end of flight', to be used throughout this report. Our terms equates to EASA term 'location of the point of end of flight'.	John Fisher	<del>03 July 2019</del> <del>24 July 2019</del> <del>28 Aug 2019</del> <del>9 Oct 2019</del> <del>13 Nov 2019</del> 3 Dec 2019
190617-I	Develop requirements/recommendations Pivot table as an aid to readers in filtering requirements/recommendations by technology and functional block.	Blake	<del>10 July 2019</del> <del>13 Nov 2019</del> TBD
190617-J	Develop content for TFD architecture study, data transport functional block discussion (section 3.2.3.3)	Ruben	<del>21 Aug 2019</del> <del>9 Oct 2019</del> <del>13 Nov 2019</del> 3 Dec 2019
<del>190807-B</del>	<del>Is there an applicable ARINC standard regarding data storage protection? <b>There is no ARINC standard presently, nor is this in work.</b></del>	<del>Peter</del>	<del>28 Aug 2019</del> <del>9 Oct 2019</del> <b>13 Nov 2019</b>
191113-A	Customize figure 10 TFD functional block diagram.	Miro	3 Dec 2019
191113-B	Edit Figure 12 to fix typo "FCIMR" instead of "FCMIR" and address black line through FCMIR column.	John Fisher	3 Dec 2019
191113-C	Reword introduction to 3.2.3.4 Off Airplane Storage	Greg Smith & John Fisher	3 Dec 2019
191113-D	Develop content for 3.2.4 Detailed Flow and Function Decomposition	Miro	3 Dec 2019
191113-E	Finalize content for 3.2.6 Key Performance Characteristic.	Miro	3 Dec 2019
191113-F	Develop content for 3.2.8 Key Network Infrastructure and Ground Segment Support	Miro	3 Dec 2019
191113-G	Develop content for 3.2.9 Key Changes to Support the Analyzed Architecture, pending group input.	Greg Moran	TBD
191113-H	Verify if data protection requirements exist for transmitted CVR & AIR/FCMIR data not part of an incident/accident investigation (Annex 13), a system management system/criminal investigation purposes (Annex 19), nor maintenance inspection (Annex 6). If not, request from ICAO.	John Fisher	3 Dec 2019
191113-I	Revisit ADFR <i>Key Performance Characteristics</i> section which appears to be more in the <i>Compliance with Requirements and</i>	Blake & Robin	3 Dec 2019

	<i>Recommendations</i> rather than <i>Key Performance Characteristics</i> (see latest TFD draft as an example).		
191113-J	Estimate remaining time required to complete phase 3 (sections 4 & 5) and finalize 2020 meeting schedule.	Group	10 Feb 2020

Closed –

ID	Action	Assigned	Closed
180411-A	Compile requirements source documents	Hannes / Greg Moran	17 May 2018
180411-B	Compile requirements from source documents into spreadsheet. "shall" = minimum requirements "should" = recommendations	Greg Moran	17 May 2018
180411-C	Draft TRFD functional block diagram	Greg Smith	18 May 2018
180522-A	Circulate EASA document (HKCAD and CAAS regulatory material)	Hannes / Greg Moran	31 May 2018
180522-B	Update TRFD functional block diagram	Greg Smith / Miro	13 June 2018
180522-C	Update requirements table for ADFR	Blake	6 June 2018
180522-D	Provided requirements table numbering scheme	Greg Moran	31 May 2018
180613-A	Add EASA location of an aircraft in distress to requirements map.	Greg Moran	13 June 2018
180710-B	Review Distress Events MASPS ED-237 and add applicable requirements & recommendations to TRFD table.	John	31 July 2018
180710-C	Identify location of EASA AIR OPS regulations.	Greg	10 July 2018
180710-E	Develop document for TFD candidate architecture	Miro	31 July 2018
180710-F	Review TFRD requirements/recommendations table to a) confirm functional block allocation and b) identify any missing requirements/recommendations	All	31 July 2018
180710-D	Develop document for ADFR candidate architecture	Blake	<del>31 July 2018</del> 6 Aug 2018
180613-B	Add combination recorder and FDR & DLR duration requirements (only CVR duration was added) in TRFD Minimum Requirements.	Blake	31 July 2018
180710-A	Review ELT MOPS ED-62B and add applicable requirements & recommendations to TRFD table.	Tom/Blake	31 July 2018
180731-A	Provide descriptive text for functional block diagram for inclusion into requirements section 2.	Greg Smith	21 Aug 2018
181026-A	Follow up with expected changes to ICAO Annex 13 for data protection and access issues.	Greg Smith	4 Dec 2018
181026-B	Should lithium battery references as listed in ADT also be listed for TRFD?	Blake	4 Dec 2018
181026-C	Review requirements/recommendations table to determine any changes or any which are missing.	All	18 Dec 2018
180731-B	Review ICAO Annex 13 and possibly also Doc9756 for applicable requirements/recommendations & create verbiage for how this is interpreted in section 2	Hannes	15 Jan 2019
181218-B	Review ED-62B requirements and recommendation for functional block assignment	Blake	15 Jan 2019
180918-A	Update section 2 from ADT requirements & architecture study for TRFD.		19 Feb 2019
	• Update Figure 5 for TRFD.	John	
	• Update Figures 4 & 11 and text after Figure 7 for TRFD; add subsections regarding HKCAD, CAAS and NPA 2018-03 (section 2.3.7)	Greg Moran	
	• Update Figure 11 for TRFD	Miro	



	<ul style="list-style-type: none"> <li>Confirm deletion of EU regulation section copied from ADT report</li> </ul>	Blake	
	<ul style="list-style-type: none"> <li>Add subsection regarding ED-112A (similar to ED-237, section 2.3.9)</li> </ul>	Greg Smith	
	<ul style="list-style-type: none"> <li>Add subsections for ED-62B (section 2.3.10), EASA CPOs and NPA TBD (section 2.3.7).</li> </ul>	Blake	
180918-B	Update section 3 for ADFR architecture	Blake, Claude, Bill	19 Feb 2019
190206-A	Finalize requirements / recommendations table – remove items marked for deletion, etc.	Robin	12 Feb 2019
190206-B	Provide section 2.4.2 input for TRFD key terms: applicable requirements document(s), requirement(s) quote(s) if necessary and identification of items needing further analysis/discussion in later sections. Refer to ADT ARINC 680 draft for example(s).		4 Apr 2019
	Distress	Greg Smith -> Greg Moran	
	Flight data, Timely	Greg Moran	
	Location of the point of end of flight	Blake	
	Recovery, Timely recovery of flight data	Hannes -> Greg Moran	
190226-A	Update Figure 2 & related discussion to be TRFD specific	John Fisher	2 Apr 2019
190226-B	Add TRFD description in Table 1	John Fisher	2 Apr 2019
190226-D	Add ADFR & TFD architecture study to section 3 of straw-man draft.	<del>Greg Moran</del> -> John Fisher	2 Apr 2019
190404-A	Reformat key term discussion to table format rather than quoting directly from requirements source document.	Greg Moran	23 April 2019
190404-B	Add ICAO Annex 13 5.14 to requirements map MS Excel file and associated table.	Greg Moran	23 April 2019
190404-D	Provide ARINC report document template	Peter Grau	4 Apr 2019
190404-C	Update TFD architecture study based on feedback provided to date.	Miro and John	15 May 2019
180918-C	Update section 3 for TFD architecture (draft 4 available for review at GAT SharePoint 681 Input / 6.) Architecture for Continuous Data Transmission)	Miro	15 May 2019
180918-D	Provide feedback for ADFR & TFD architectures to Blake & Miro, respectively	All	18 June 2019
181218-A	Review ED-112A requirements and recommendations for technology and functional block assignment, or further discussion to be added to requirements section 2 (e.g. mandatory parameter list).	Greg Smith	18 June 2019
190617-A	Add general note in requirements and recommendations tables regarding the applicability of ED-112A to TRFD, where appropriate.	Greg Smith	10 July 2019
190617-B	Review ED-112A for specific elements that apply to TFD e.g. start/stop logic, data handling, CVR audio quality, derive bandwidth, data compression, documentation.	Greg Moran	10 July 2019

190617-E	Editorial: update figures to latest available from contributors.	John Fisher	10 July 2019
190617-F	Add EASA RMT.0400 to GAT SharePoint	Greg Moran	10 July 2019
190617-G	Remove requirements/recommendations from draft NPAs (without number assigned & not publically available). CPOs can remain but flagged as requiring an update when NPA is released (expected October, 2019).	Greg Moran	10 July 2019
190617-H	Add requirements/recommendations with functional block assignments specific to ADFR and TFD in respective architecture study sub-sections. Renumber identity code for requirements/recommendations tables to sequential rather than follow ADT numbering convention.	Greg Moran	10 July 2019
190617-K	Develop content for TFD architecture study, off aircraft storage functional block discussion (section 3.2.3.4).	Janine Roux	07 Aug 2019
190710-A	Define ARINC standard for terms 'must', 'will', 'shall', 'should', etc. so that we are consistent within the ARINC 681 report. <i>Terms defined in ARINC 647.</i>	Peter	07 Aug 2019
190617-C	Editorial: add introductory sub-section in section 2 for an organization when that organization has two or more applicable documents.	John Fisher	09 Oct 2019
190617-L	Review ICAO or other guidance regarding guidance for SAR recovering the ADFR, which could be added to our requirements/recommendations tables. <b>Only Doc10054 section 3.5 discusses recovering the ADFR.</b>	Blake	09 Oct 2019
190807-A	Add discussion explaining "REQ" and "REC" identity codes to section 2.	Greg Moran	09 Oct 2019
190918-A	Update ADFR architecture figure and/or text to indicate that ADFR DT implementation is not meant to suggest the only means to satisfy the ADT requirement.	Blake	09 Oct 2019
190807-B	Is there an applicable ARINC standard regarding data storage protection? <b>There is no ARINC standard presently, nor is this in work.</b>	Peter	13 Nov 2019

## Attachment 1

### ARINC 681 Report Revision Process

John Fisher, Technical Editor

- Trust but verify – I make changes and mistakes, I am not the best guy for the job but the best one we have, please help me by pointing out typos, mistakes etc. and please be patient.

- Configuration control – if you fail to provide comments to a version and we start a new version, you will need to incorporate your comments into the newer version.

- If you comment after the due date I'll try to incorporate it, but you may have to wait until the next version to provide comments.

“Bad” comments will be noted, for example:

Text	Comment	Response
“The FDR must data when turned on”	Need to improve language.	Noted, no change.

“Good” comments will be addressed, for example:

Text	Comment	Response
“The FDR must data when turned on.”	The FDR must <b>record</b> data when turned on.	Agreed, text changed.
“The FDR must data when turned on.”	Add ‘record’ after the word mus.t	Agreed, text changed.

- If you submit a comment, please verify it was incorporated into the document, (if it is not done in front of you on the spot at a meeting etc.). I try not to make errors of omission but may do anyway. Please perform quality control on my work!

## Attachment 2

### Clarification requested from ICAO regarding Doc10054

The following areas of improvement for ICAO Doc10054 have been identified with regard to timely recovery of flight data guidance material for Annex 6 Part I 6.3.6 SARP as industry works to examine the potential to develop associated industry standards.

1. ICAO Doc10054 references Annex 6 Part I 6.3.5 flight data recovery in multiple locations, but the section has been revised to 6.3.6 in the latest Annex 6 Part I amendment.
2. ICAO Annex 6 Part I 6.3.6.1 requires “a means ... to recover flight recorder data”. This has been construed by some as all flight recorder data from each fixed recorder (FDR, CVR, DLR, AIR/FCMIR).
  - a. Doc10054 3.3.3 Definition of flight recorder data discusses “any type of recorder...” but then section 3.3.4 describes the ‘set of data to recover’ which is a subset of all flight recorder data. Sections 3.3.3 and 3.3.4 do not describe that the set of flight recorder data to recover differs depending on the technology (transmission of flight data is a subset whereas automatic deployable flight recorder would be the same as fixed recorders). Some incident investigator are interpreting the SARP and Doc10054 to require all flight recorder data to be transmitted, which is not technically feasible with existing technology. Sections 3.3.3 and 3.3.4 appear to conflict with the TFD sections later in the document whereby a subset of flight recorder data is described as the minimum requirement.
  - b. 3.3.9.1 could be amended to “a) to recover selected flight recorder data...”
3. Annex 6 Part I 6.3.6.2 discusses only “appropriate CVR channels and appropriate FDR data”. Doc10054 includes DLR and AIR / FCMIR but does not discuss why these are included, as the SARPs only discuss CVR and FDR.
  - a. Doc10054 section 3.6.10.5 requires DLR messages to be transmitted.
4. Doc10054 is not consistent with regard to terminology (AIR and FCMIR are both used). It is suggested to use FCMIR throughout the document, with a short discussion about the relationship between AIR and FCMIR.
5. Doc10054 was written prior to Annex 6 Part I 6.3.4 Flight crew-machine interface recordings. An update to Doc10054 appears appropriate to provide guidance on transmission of FCMIR.
  - a. For example, in Doc10054 section 3.6.9 Format of the flight crew-machine interface data which may suggest (and has been construed by some) that transmission of such data is required.
  - b. The bandwidth necessary to transmit FDR, CVR and DLR was analyzed but not FCMIR.

c. Doc10054 section 3.6.10.x does not include any requirement or recommendation regarding transmission of FCMIR. A separate subsection (e.g. Transmission of FCMIR image data) is requested to clarify.

6. An incident investigator has suggested that because of the following requirement “The system providing timely recovery of flight recorder data has to provide at a minimum the data from the time the aeroplane enters the distress conditions to the end of the flight.” that the equipment must be able to withstand extreme environmental conditions not normally required for recording systems equipment and/or possibly have battery backup. Robustness of the power supply is already addressed in Doc10054 section 3.3.10; however, clarification is requested for the expected environmental qualification test requirements (understood to be no different than the existing recording system).

7. Doc10054 section 3.6.10.4 the estimate for required parameters in a 1024wps data frame could be better described as a range of 3-5Kbit/second, rather than 3Kbit/second listed.

8. Doc10054 section 3.6.10.7 has a phrase “As the duration of the event cannot be predicted” but no further context. It is understood that the priority of transmission listed in Table 3-2 is during a non-normal conditions (event) with insufficient bandwidth exists to transmit all defined flight recorder data. Some have construed this table to mean priority to transmit during normal conditions whereby a system could be designed only to comply with priority 1-3 for example.

9. Doc10054 table 3-2 lists priority for transmission of flight data.

a. The table has recommended historical data prioritized over required real-time data. It is requested that the priority be revisited considering required and recommended data to be transmitted.

b. The table has priority 7 “Other data (non-required FDR parameters, AIR)” which has been construed by some as a requirement to transmit non-required FDR parameters, AIR). Clarification is requested as to the meaning of “Other data”, e.g. “Non-required flight data” with a note that priority 7 is a recommendation, or consists of other flight data an operator voluntarily elects to transmit.

c. Relating to item 13 historical data download rate, should industry maximize the historical data download rate for priority 3 **Required FDR parameters – historical** to preclude (stop) transmission of priority 4 **CVR crew microphones audio – real-time** until the minimum twenty (20) minutes of priority 3 **Required FDR parameters – historical** is complete? The real-time download data rate is fixed but the historical download data rate can vary. Doc10054 does not discuss a minimum or maximum data rate to apply to historical data download. How does the available bandwidth (normal versus non-normal) affect the prioritization and historical data download rate?

10. Sections 3.6.10.12 & 3.6.10.13 Transmission of CVR audio data would be more logically located adjacent to the sections 3.6.10.5 & 3.6.10.6 Transmission of flight recorder data. Currently these two sections are separated by Priority of flight recorder data to transmit.

11. A separate section caption is recommended for section 3.6.10.6, e.g. Transmission of FDR parametric data as is the case for transmission of CVR audio data.

12. A separate subsection is requested for transmission of DLR messages (e.g. Transmission of DLR message data), as transmission of DLR messages is required by 3.6.10.5.

13. For transmission of historical flight recorder data, section 3.6.13.7 requires most recent data to be given highest priority, but there is no discussion of the time (e.g. 60s) needed to transmit the minimum twenty (20) minutes (per section 3.4.3.4) of historical flight data. Should guidance be provided for this recommended historical flight data, or is this best effort?

14. Data protection requirements appear to be missing for transmitted CVR & AIR/FCMIR data not part of an incident/accident investigation (Annex 13), a system management system/criminal investigation purposes (Annex 19), nor maintenance inspection (Annex 6).