

Comment-Response Document for Boeing B737-700 VIP Interior
ESF D-01 – Issue 1

Commenter	Comment	EASA position
CAA-UK	<p>1- Comment against ESF Paragraph ‘Justification and Safety Equivalency Demonstration’ :</p> <p>The Justification and Equivalent Safety Demonstration sections both mention the in-flight case, the former in relation to the presence of trolleys. The requirements for aisle width are only relevant to emergency evacuation. The references to in-flight should be deleted from the document.</p>	<p>EASA position:</p> <p>The affected aircraft has a VIP interior including 17 passenger seats. Some of the passenger seats have the potential to reduce the required aisle width during flight. The safety concern is not about trolley movement but the possibilities to return to a safe seat in case of in-flight emergency or the required cabin crew to reach any area of the cabin for in-flight emergencies. Therefore the reference to in-flight will not be changed.</p>

CAA-UK	<p>2- Comment against ESF Paragraph ‘Justification and Safety Equivalency Demonstration’ :</p> <p>The configuration of the cabin for taxi, take-off, and landing is stated to be ensured by cabin crew when in 'commercial operation', and otherwise by placard and AFM. If acceptable these measures should not be considered as compensating features for a reduced aisle width but as a means of achieving the required aisle width for take-off and landing. If they cannot be reliably counted on, then it is difficult to see why they are considered to be 'equivalent'.</p>	<p>EASA position:</p> <p>Passenger of a not commercial operated aircraft are considered as familiar with the VIP interior, the special features and the proper TT&L configuration. This is because they frequently fly with the same aircraft. Therefore a briefing and appropriate placarding is considered as acceptable means to ensure proper TT&L configuration. Contrary to this commercial operated aircraft have frequently changing passengers that will not have the same familiarity with the interior. Therefore the required cabin crew, on an aircraft which would not normally be required to have one present, is considered as one of the compensating factors in this ESF.</p>
CAA-UK	<p>3- Comment against ESF Paragraph ‘Justification and Safety Equivalency Demonstration’ :</p> <p>If it is acknowledged that the interior components may not be diligently configured for take-off and landing, there should be some more detail concerning the ease by which a passenger can pass through the restriction presented. Although the emergency exit availability may be advantageous compared to other aircraft, it should still be ensured that a passenger, wherever located in the aircraft, if necessary can gain access to any available exit</p>	<p>EASA position:</p> <p>The proposed design of the interior ensures by the described features that all passengers have access to proper emergency exits as required by the rule. The worst case, in the event that one or more seats are placed appreciably away from the correct TT&L position, is that some passengers may need to traverse a reduced aisle width, for a short distance, to access certain exits. As explained in the conditions set for the acceptance of the ESF, this is considered no worse than the situation in a conventional airliner interior where many passengers seated in outboard seats need to traverse the gap between seats to access the aisle.</p>