EASA	COMMENT RESPONSE DOCUMENT
	Proposed Special Condition on Installation of Overhead Sleeping Compartment **Applicable to Boeing 747-8** **Issue 1**

Commenter 1 : CAA-UK

Comment # [1] – Terminology

The subject of this Special Condition is named as an Overhead Sleeping Facility (OSF) and each individual sleeping or bed area within it is referred to as a 'compartment'. It is assumed that the individual bed areas are separated for privacy by partitions but not 'compartmentalised' (or isolated) within the facility.
The word compartment is generally used to describe areas which can be completely isolated from the cabin by walls and doors, such as crew rest compartments (CCRC, LDCRC, FCRC), toilet compartments, baggage compartments etc.
It would appear better therefore to name the whole compartment as an Overhead Sleeping Compartment and then the individual bed areas as sleeping modules.
There are several places in the text which are confusing as to whether the complete Overhead Sleeping Facility is the subject or the individual sleeping 'compartments'. Changing the nomenclature would facilitate clarity and be consistent with other applications and Special Conditions.

Comment :
Clarity and consistency with other applications.

EASA response:
Agreement - CRI wording is changed accordingly.

Comment # [2] – Paragraph 4)b) – Wording clarification

Comment :

It is proposed replacing '*operating instructions for each evacuation route*' by 'operating instructions for each emergency exit'.

EASA response:
Disagreement - The Overhead Sleeping Compartment is installed adjacent to the overhead cabin crew rest compartment (CCRC) installed by Boeing and one of the OSSC escape possibilities is though the CCRC. It is therefore considered that the general term "escape route" is more appropriate.

Comment # [3] – Paragraph 4)e) – Wording improvement

Comment :
It is proposed replacing '*The above requirements….*' with 'Compliance with these requirements….

EASA response:
Agreement - CRI wording is changed accordingly.

Comment # [4] – Paragraph 7) – Wording improvement

Comment :
It is proposed replacing '*present in the overhead sleeping compartment….*' with 'present in a sleeping compartment' or 'any of the…' in order to be consist with other text.
Note: Please refer also to the first comment above.

EASA response:
Partial agreement - The comment is understood. The wording is slightly modified to be more precise but not as proposed. It should be clear that no passenger should enter the overhead sleeping compartment without a cabin crew present and not only if passengers are in one of the sleeping modules.

Comment # [5] – Paragraph 17) – Wording simplification

Comment :
The first sentence in this paragraph should be omitted.
This paragraph is addressing a specific hand hold requirement, not turbulence in general.

EASA response:

Agreement - CRI is modified accordingly.

Comment # [6] – Paragraph 20)d) – Wording improvement

Comment :
In order to improve the wording and to clarify the intent, it is proposed replacing current text with: 'Enclosed stowage compartments within the OSF should not be larger than required to contain passengers' immediate effects and should be designed to allow a crew member to effectively reach any part of the compartment with contents of a hand held fire extinguisher.'

EASA response:
Agreement - CRI is modified accordingly only "passenger immediate effects" is replaced by "passengers personal effects".

Comment # [7] – Paragraph 26) – Wording improvement

Comment :
It is proposed replacing '*demonstrated to work*' with 'demonstrated to be practicable'.

EASA response:
Agreement - CRI is modified accordingly.

Comment # [8] – Paragraph 26) – Best practice

Comment :
Best practice for safety considerations is to use 99th percentile males. Whilst this may introduce a disparity with crew rest compartments it should be noted that the crew population is not the same as the travelling public population.

EASA response:
Noted - EASA accepts that the normal certification usage of 95th percentile male size/weight values might be inappropriate in certain highly critical safety situations. For instance, in cases where a larger and/or heavier person would have no, or practically no, chance of escape, a higher percentile should probably be used. However, in the subject case, and after further consideration, EASA is of the opinion that demonstration of a practicable means to evacuate a 95th percentile male will provide sufficient evidence that the evacuation of a larger person will also be possible.

Comment # [9] – Paragraph 27) – Wording improvement

Comment :
In fourth paragraph of 27) delete '*including the emergency evacuation of an incapacitated occupant from the OSF*'. This is already addressed in previous paragraph 26).

EASA response:
Agreement - CRI is modified accordingly.