


EASA	COMMENT RESPONSE DOCUMENT
	Equivalent Safety Finding to CS 29.855(d) on Cargo and baggage compartments Applicable to Eurocopter EC 175B Issue 1

Commentor: **UK CAA]**

Comment # 1 –

Topic/ Paragraph reference- CS 29.855(d) ESF Statement of issue

Target. agreement on the technical issue but recommendation to consider future rule change to standardize the approach to the topic.

Comment : CS 29.855 (d) is written and interpreted as requiring flight test to demonstrate both the fire/smoke detection function and the capability of the baggage compartment to contain smoke and toxic gases. This equivalent safety finding substitutes analysis for the latter. This may be technically acceptable, particularly for an unpressurised aircraft, but there is nothing special about this particular aircraft and therefore consideration should be given to changing the rule and its interpretation if this case is a precedent.

EASA response:

Comment noted. The EASA policy to submit new and important ESF to public consultation has the objective of sharing amongst all potentially interested parties a new and acceptable mean for showing compliance with the intent of the rule. In lack of technical objections during the comment period, such a new approach can be applied in future, upon substantiation, by other Applicants. In addition, under the applicable procedure, EASA consider updating the rule in accordance with this ESF.