

## Comment-Response Document for Airbus A380 SC D-41

Commenter	Comment	EASA position
CAA-UK	Missing text at the end of the paragraph 13 . page 2	<p><b>CRI coordinator comment :</b></p> <p>Format issue. CAA-UK has re-confirmed 'no further comment'. Paragraph 13 is changed (see below).</p>
Boeing Commercial Airplanes	<p><b>1- Comment against SC Paragraph 5:</b></p> <p>There is no requirement included for the flight attendants seated at their stations to be able to have seated occupants in direct view at any time. This has been required for finding compliance with CS 25.785 (h) (2). There is nothing comparable in the proposed SC.</p> <p>Note: Compliance with CS 25.785 (h) (2) has typically been shown by using attendant viewing capability while seated at the attendant station. (Also see comment on #5)</p>	<p><b>EASA position:</b></p> <p>SC Paragraph 5 is not related to compliance to JAR/CS 25.785(h). SC Paragraph 5 was introduced to ensure that cabin crew can perform their duties during flight while not seating on a cabin crew seat.</p>
Boeing Commercial Airplanes	<p><b>2- Comment against SC Paragraph 9:</b></p> <p>For similar installation, the FAA has previously required the following (Excerpted from 777 IP C-1, dated March 30, 2007) :</p> <p style="text-align: center;"><i>“An additional flight attendant above the minimum</i></p>	<p><b>EASA position:</b></p> <p>Mini suite type seating installations are first class cabin interiors. The passenger density is significantly lower than in economy class cabin area (see also SC Paragraph 21). Based on this the additional check of the mini-suites doors taxi, take-off and landing position will not enhance</p>

	<p><i>required by the applicable operating rules, whose principle duty during taxi, takeoff, and landing would be to ensure that the mini-suite doors are properly latched in the open position.”</i></p> <p>The proposed A380 SC has no requirement for an additional attendant. EASA and FAA requirements for the installation of mini-suite seating should be parallel in order to ensure that the same of level of safety is met.</p>	<p>the cabin crew workload to the extent that an additional cabin crew is necessary to perform this duty.</p>
<p>Boeing Commercial Airplanes</p>	<p><b>3- Comment against SC Paragraph 13 :</b></p> <p>The proposed A380 SC requires that the suite doors have an ‘Emergency Passage Failure’, either by frangibility or removal of doors without assistance. However, this is significantly different from the FAA’s previously issued requirements (as define in B777 IP C-1, dated March 30, 2007) that require the B777 installation to have a secondary egress path <u>AND</u> to demonstrate that there is room between the suite walls and airplane furnishings such that the occupant could go over the wall. There is nothing obvious in the proposal that would explain this difference. EASA and FAA requirements for the installation of mini-suite seating should be parallel in order to ensure that the same of level of safety is met.</p>	<p><b>EASA position:</b></p> <p>Agreed:</p> <p>SC Paragraph 13 is revised as listed below and a new Paragraph 14 is introduced.</p> <p>13. The mini-suite must have an Emergency Passage Feature (EPF) to allow for evacuation of the mini-suite occupant in the event the door closes and becomes jammed during an emergency landing. This EPF may be through frangibility and /or a removable of emergency panel, or equivalent (such as dual sliding doors). The EPF must be easily broken /removed by the occupant of the mini-suite when the door becomes jammed. Trapping of any occupant is not acceptable and in no case shall the occupant using the EPF have to rely on another occupant to assist in passage. In addition a second path out of the mini suite must be provided. All ways to exit the mini suite in case of emergency must be demonstrated to work for a 5<sup>th</sup> percentile female and a 95<sup>th</sup> percentile male.</p>

		<p>14. The height of the mini suite walls and doors must be such that a 95<sup>th</sup> percentile male can fit between them and the airplanes interior furnishing.</p>
Boeing Commercial Airplanes	<p><b>4- Comment against SC Paragraph 20 :</b></p> <p>For a similar installation, the FAA has previously required the following (Excerpted from 777 IP C-1, dated March 30, 2007) :</p> <p><i>“Installation of mini-suites on B777 reduces the occupancy in a given area by a factor of 6. All other things being equal, the reduction in the total number of occupants in a given part of the cabin is an enhancement to safety”</i></p> <p>However, the A380 proposed SC only requires a reduction of the occupancy by a factor of 4. There is nothing obvious in the proposal that would explain this difference. EASA and FAA requirements for the installation of mini-suite seating should be parallel in order to ensure that the same of level of safety is met.</p>	<p><b>EASA position:</b></p> <p>EASA has reviewed B777 IP C-1. The wording Boeing is referring to is provided as a compensating feature and is a description of the actual Boeing installation of mini-suites on the B777. Our understanding is that a factor of 6 was proposed and accepted as a compensating feature. It is not clear that a factor of 4 would not have been accepted. In contrary to that the EASA SC Paragraph 20 introduces a limit to the installation of mini-suites on A380. Which EASA believes is appropriate.</p>
Boeing Commercial Airplanes	<p><b>5- Comment against SC Paragraphs 21 &amp; 22 :</b></p> <p>This proposed SC addresses at least part of the direct view issue, including visibility of specific aisle “widths” and persons standing in the main aisle at the seat module entrance. However, there is no discussion of how compliance needs be demonstrated for views of</p>	<p><b>EASA position:</b></p> <p>Boeing’s comment is correct, i.e. it is normal for direct view compliance means to include visibility of the passengers themselves and/or their seats. However, in the case of mini-suites it was concluded that due to the low number of passengers involved and bearing in mind the fact that traditional means of compliance accept the</p>

	<p>occupants seated in the mini-suite.</p> <p>Note: Compliance with CS 25.785 (h) (2) has typically been shown by using attendant viewing capability while seated at the attendant station.</p> <p>There is nothing comparable in the proposed SC.</p>	<p>possibility of large numbers of passengers, in for example economy seating areas, may not be visible, that compliance could be based on visibility of the aisles and suite entrance areas.</p> <p><b>Note:</b> Although it is not stated, SC 22 and 23 (were 21 and 22) are included for clarification of acceptable compliance means to JAR25.785(h)(2) and thus the normal principle that the requirements apply to the situation of attendants seated and belted applies. These SCs will be revised to clarify this by adding the following text “For compliance to JAR 25.785(h)(2),...and....”</p>
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