

EASA	COMMENT RESPONSE DOCUMENT
	Proposed Special Condition for Installation of Suite type seating for two passengers Applicable to A380 Issue 1

Commenter 1 : Boeing (Operational Regulatory Affairs)

Comment # [1] – Special Condition – 2)

Text states : “ ... An escape path, not involving the negotiation of any door(s), shall be provided meeting the dimensional requirements of CS 25.815. The escape path may be achieved by not incorporating any door(s) in the mini-suite design or by providing a secondary escape path.”

Comment :

In order to add clarity and preciseness to the required action, it is suggested re-wording as follows:

“2) An escape path to the nearest main aisle, not involving the negotiation of any door(s), shall be provided meeting the dimensional requirements of CS25.815 that corresponds to the occupant count of the suite.
The escape path may be achieved by not incorporating any door(s) in the mini-suite design or by providing a secondary escape path.”

EASA position: Agreement.

EASA response: The CRI is amended accordingly

Comment # [2] – Special Condition – 2)

The proposed requirement CS 25.815 is unclear.

Comment :

Meeting the dimensional requirements of CS 25.815 stipulates horizontal width of a vertical opening in addition to the door.

Is this the intent of this special condition?

It is recommended that the secondary path not involving the door can be any egress path that a 5th percentile female and a 95th percentile male can utilize.

EASA position: *Noted.*

EASA response: Yes it is the intent of SC. The objective of the SC is to require an additional floor level exit path (without any obstacle) if the suite type seating will be used by more than one passenger for Taxi, Take-off and Landing which is more stringent than requiring the compliance with “egress path that a 5th percentile female and a 95th percentile male can utilize” as some egress path meeting this latter criteria may not be floor level exit paths. It has to be noted that this additional floor level exit path requested by the SC must not necessarily provide the shortest route to the nearest main aisle.

Comment # [3] – Special Condition – 3)

Text states : “ ... *Unless there is for each escape path a short and direct access to the nearest main aisle, exit signs and low level floor path lighting are required.*”

Comment :

It is recommended adding the CS section numbers to identify exact requirements for “exit sign” and “floor path lighting.” This will minimize confusion and add clarity.

It is suggested re-wording the paragraph 3 as follows:

“3) *Unless there is for each escape path a short and direct access to the nearest main aisle, exit signs **meeting CS 25.811**, and low level floor path lighting **meeting CS 25.812(e)** are required.*”

EASA position: *Agreement:*

EASA response: *The CRI is amended by adding CS 25.811(d)(3) and CS 25.812(e) to the text.*

EASA Note :

Following the comments received, EASA has decided to modify and to re-issue the Special Condition on “installation of suite type seating for two passengers” - Applicable to A380 – (Click here - [hyperlink](#)).

Most of the changes brought to the initial issue were editorial, therefore a new consultation has been judged not needed.