



# EASA – APPENDIX S

# APPENDIX S

## The Good:

- Provides alternative criteria for certifying low-occupancy airplanes due to uniqueness of their interiors
- Relieves the need for CRIs
- Used as a basis/foundation to establish FAA Issue Papers

## Opportunities for Improvement:

- Some requirements may be inappropriately applied for Gulfstream size airplanes
- Harmonize FAA Issue Papers with Appendix S requirements to clean up certification basis (less SSDs)

# APPLICABLE APPENDIX S EXAMPLES

Regulation	Feature(s) that meets the regulation
S25.30(a): Width of aisle	Requirement met by installing easily comprehensible placards that restore the aisle into the TT&L condition and have the cabin be easily accessible in the event of an in -flight emergency even with worst case positioning.
S25.30(b): Firm Handholds	Requirement typically not applicable since seats are located uniformly across the cabin but in their absence, other interior furnishings provide means to the occupants to steady themselves e.g., sidewall, bulkheads, PSU etc.
S25.40(a): No Smoking' Placards and Lavatory Ashtrays	Requirement met by installing a NO SMOKING placard by the Main entry door which is the only boarding door for the passengers.
S25.40(c): Seats in Excess	Requirement met by installing a max passenger count placard by the Main Entry Door and by adding a limitation in the AFMS to limit pax count to 19 even when more than 19 seats are installed.

# FAA IP VS APPENDIX S HARMONIZATION EXAMPLES

- CS Appendix S25.10(a)(b) vs Exemption 18556B:
  - Allow the installation of interior doors between passengers and exits
  - Provide exemption against 25.813(e)
  - FAA Exemption has some design feature requirements that were derived directly from EASA Appendix S
- CS Appendix S25.40(c)(1) vs FAA Issue Paper C-04:
  - Addresses the condition when seats in excess of maximum passenger capacity is installed
  - Method of compliance in the issue paper was derived directly from EASA Appendix S



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# THANK YOU

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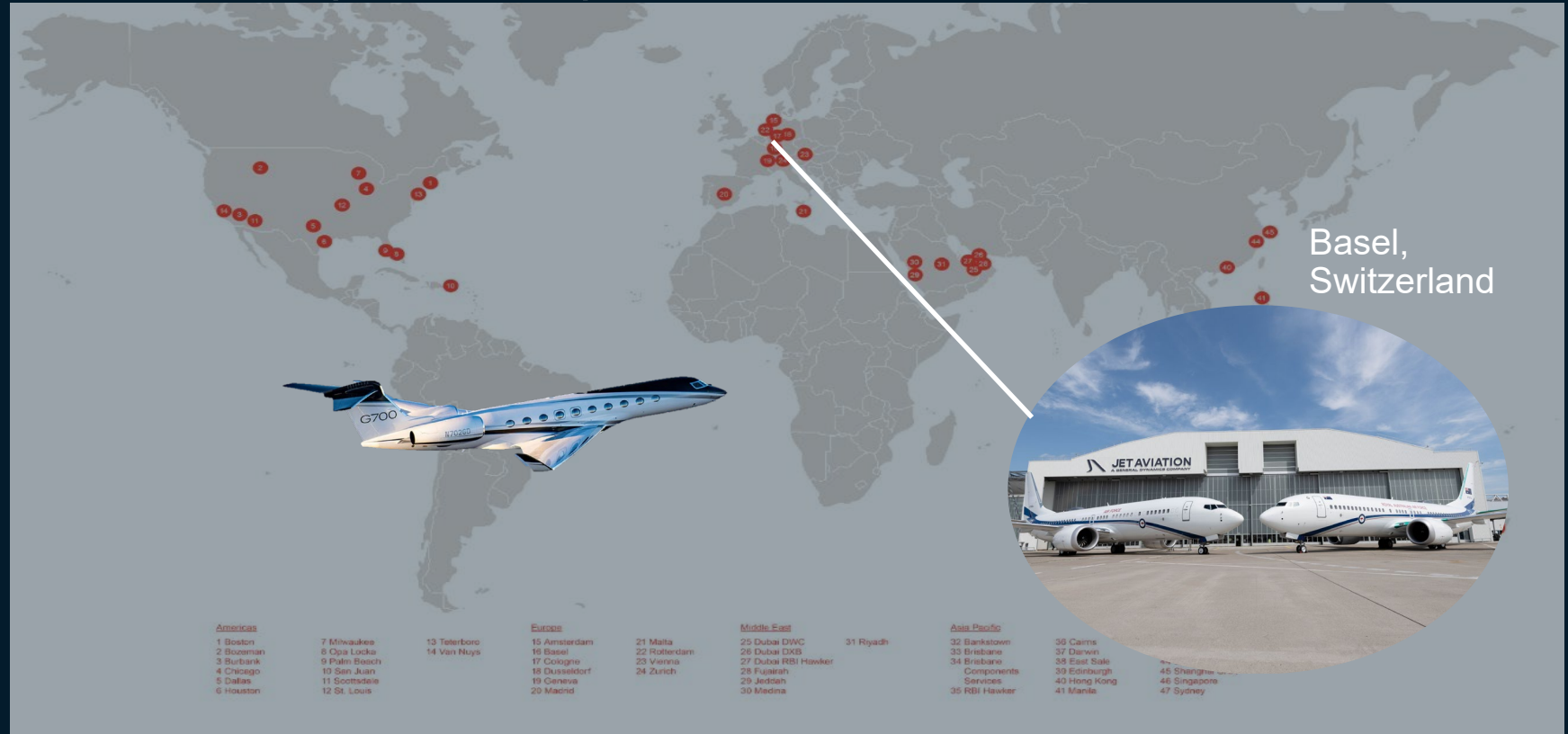


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# G700 European Completion Center



# Appendix S Experience

- JA was a member of the Appendix S working group.
- Appendix S was released however some subjects were never fully agreed between industry and EASA.
- The objective to reduce CRI's was successful
- In hindsight, some areas would benefit from refinement to remove ambiguity
- Further opportunities to explore



# Aircraft Modifier perspective

- TCH support can vary; can be no support at all or often limited amount and scope (subject to cost)
- Some aircraft types are virtually impossible to manage without TC holder support
- We may need to be creative in our solutions with increased conservatism
- As a sister company of Gulfstream, JA are lucky to have full TCH support.
- For new STC, we cannot rely on “same as TCH”; we are subject to new investigations.
- The G700 completion line STC approach is relying heavily on the principal of pre - approved areas, rooms and systems.

# FAA Validation

- It was always the hope FAA would adopt Appendix S.
- FAA raise issue papers to address the difference between SFAR109 or in some cases we must adapt the design to meet FAA.
- VIP interiors are nearly always non -basic. The validation effort is considerable in resource, time and cost and very difficult to predict.

## Our wish for the future

- Private use aircraft eligible to be treated as basic following a streamlined validation
- Proportionality concept – low risk, not transporting fair paying passengers.
- Reduce the burden on both industry and regulator without jeopardizing safety



Thank you