

Comment				Comment summary	Suggested resolution	Comment is an observation (suggestion)	Comment is substantive (objection)	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	MEGA Maldives Airlines			<p>With reference to EASA Proposed CM No.: Proposed CM–CS-008 Issue 01 issued 16 September 2015 can you confirm if EASA still maintains this position with regards to minimum number of cabin crew required?</p> <p>The Maldives has adopted many of the same EASA regulations and the wording with regards to ORO.CC.100 the wording in the Maldivian regulation is the same as EASA. Should there be a chance to the EASA regulation under the CM above it would most likely be adopted by the Maldives as well. We would like to amend our documentation in advance if EASA takes the position of the CM above and will eventually make it regulation.</p>				Noted	<p>Please note that the proposed CM-CS-008 Issue 01, open for comments from interested parties, issued on the 16 September 2015, was the subject of several negative comments.</p> <p>Subsequently, it was revised appreciably and opened again on 26th July 2016 as Issue 01, Revision 01 for comments from interested parties.</p> <p>This later Revision significantly alters the scope and purpose of the CM.</p> <p>However, EASA can confirm that the original version did not, and Revision 01 does not seek to amend the requirements in ORO.CC.100.</p> <p>The purpose of the Certification Memorandum is to clarify the interrelationship between certification and operational requirements establishing the minimum number of cabin crew.</p>
2	International Air Carrier Association (IACA)			<p>I accidentally discovered this proposed Certification Memorandum on the EASA website. Considering the intense discussions with EASA since 2014, I would have expected EASA to send this to the concerned stakeholders for consultation rather than them having to find it accidentally on their website.</p> <p>The attached CRD captures correctly the concerns of the airlines, who specifically appreciate EASA's engagement to liaise with FAA to solve the lack of harmonisation.</p> <p>In the proposed CM, IACA specifically appreciates the statement at bottom of page 4 – top of page 5: "...until the situation can be fully resolved, usage of the reduction provisions of sub paragraph ORO.CC.100 (b)(2) may be assumed to be applicable, provided there is no specific mention of an assumed number of cabin crew members in the CS 25.803 compliance documentation for the particular passenger cabin in question..."</p> <p>This should address the particular concern of IACA carriers with the Boeing 767.</p> <p>To conclude, the onus will be on Design Organisations to include for (new type certificates and) cabin modifications a clear indication of the number of cabin crew members assumed, and their locations in the cabin.</p> <p>Last but not least, it became now clear to me that EASA was trying to tell the airlines that the new OPS rule did not change the CERT requirements, but the new OPS rule no longer allow to deviate from the CERT requirements unless specifically substantiated. Please correct me should my understanding be wrong.</p>				Noted	<p>The purpose of the Certification Memorandum is to clarify the interrelationship between certification and operational requirements establishing the minimum number of cabin crew. The underlying principle is that such a number should result from an analysis which takes into account the specificities (number of seats, cabin layout) of each individual cabin configuration. To cater for the transition period until this new data point will be demonstrated for each individual cabin configuration, the Certification Memorandum also clarifies when paragraph ORO.CC.100(b)(2) applies.</p>

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3	Airbus SAS	Section 4.1	6	Airbus concurs with the proposed Certification Memorandum CM-CS-008 issue 01 revision 01 related to cabin crew members assumed to be on board. We agree with the recommendation to indicate in the certification documentation the number of required cabin crew and their position in the cabin.			Yes	Noted	Thank you for your comment.
4	Airbus SAS	All	All	General Comment: Airbus would like to bring to your attention our basic concern about a lack of international harmonization in the field of operational rules. Airbus is aware that operational rules are more driven by the respective regulatory system than airworthiness issues. Among others, this dis-harmonization appears in different approaches to define the number of cabin attendants in specific situations and the link with the number of required cabin crew and their position established during the aircraft certification process is not always considered by national regulations.	Having this situation in mind, Airbus recommends that the minimum required cabin crew should be defined through worldwide harmonized operational rules.	Yes	Yes	Noted	This is a valid point, however such harmonisation will not be achieved by amending EASA Operational or Certification requirements. This topic is being discussed during harmonisation meetings with other regulators. Furthermore, work is progressing at ICAO level on providing more guidance to contacting states on the establishment of minimum number of cabin crew, which should ultimately ensure a better harmonisation at global level.