

Comment				Comment summary	Suggested resolution	From the commenter point of view a modification of the published text is*: -Not requested; -Recommended; -Requested	EASA comment disposition	EASA response
NR	Name of the organisation commenting	Section, table, figure	Page					
1	Lufthansa Technik	Subject	1	Reference is made to <u>symbolic</u> exit signs. However, the requirements seem valid for signs using the word “EXIT” as well.	Clarify applicability for both worded “exit” and symbolic signs.	Requested	Noted	Thank you for your comment. In order to be presented for public consultation, EASA is following particular design proposals to be approved . Upon receipt of a request for approval of a worded “exit” signs, this ESF can be reviewed and potentially extended in applicability. EASA acknowledges the comment, but will not change the text.
		Title	4					
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2	Lufthansa Technik	3.e)	4	What is the rationale behind the 70% limit?	Please explain in CRD	Not requested	Noted	Thank you for your comment. This value is based on experience from previous similar projects where this limit was found acceptable. Upon receipt of a request for a more extensive limit, this ESF can be reviewed and this limit potentially extended. EASA acknowledges the comment, but will not change the text.
3	AIRBUS	Background to the Compensating Factors used last section	2	quote: Therefore, a pre-installation lighting compliance check must be performed to determine the lux levels at the area of installation of the sign; when combined with the appropriate charging duration, the initial brightness requirement is met for the ‘first flight of day charge’. UNQUOTE Airbus Comment It is well understood and accepted that performance must be demonstrated. Nevertheless, the wording leaves open, whether a single demonstration (e.g. in TC or for MOD introduction) is requested, or whether there is a need for compliance demonstration for each HoV.	Airbus request: Please confirm that the design concept verification complies with this requirement.	Requested	Not Accepted	Thank you for your comment. EASA does not agree to the comment In order to be presented for public consultation, EASA is following particular design proposals to be approved . It is not intended to provide additional guidance for compliance in context of this ESF. EASA will not change the text.
4	AIRBUS	prop. ESF Compensating Factors Chapter 3c	4	quote: The background of the photo luminescent exit signs shall not decrease the legibility of the sign in comparison to a sign that is in compliance with 25.811(d). UNQUOTE §25.811 defines the installation places for emergency exit marking signs. It is not understood how §25.811 influences the design of these installation places themselves.	Airbus request: Please clarify the intention of Chapter 3c. A rewording of Chapter 3c might be useful.	Requested	Accepted	Thank you for your comment. EASA has revised the text to clarify the intention. The background of the photo luminescent exit signs as per ‘Compensating factors’ point (a) shall not decrease the legibility of the sign in comparison to a sign that is in compliance with 25.811(d) and 25.812.

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5	AIRBUS	prop. ESF Compensating Factors Chapter 3d legibility	4	quote: "In an emergency evacuation situation, the electrical emergency lighting system shall be powered “ON” and provide a level of illumination <u>which ensures that the photoluminescent exit signs are legible from the maximum viewing distance.</u> " UNQUOTE The definition of legibility is unclear, thus a compliance demonstration remains subjective.	Airbus request: Please provide a measurable definition for the legibility of a photoluminescent symbolic exit sign. (Please compare with §25.811(f)(2))	Requested	Not Accepted	Thank you for your comment. EASA does not agree to the comment. In order to be presented for public consultation, EASA is following particular design proposals to be approved . It is not intended to provide additional guidance for compliance in context of <u>this</u> ESF. EASA will not change the text.
6	AIRBUS	prop. ESF Compensating Factors Chapter 3d worse case testing	4	quote: " <u>In addition, testing conducted under worst case scenario conditions, i.e. no emergency lighting operational (black out), demonstrated an additional safety benefit provided by photoluminescent signs.</u> " UNQUOTE Although this statement is a compensating factor, it is not understood as an additional requirement.	Airbus request: Please delete this statement for improved clarity.	Requested	Not Accepted	Thank you for your comment. EASA does not agree to the comment. EASA considers this statement is needed to understand the overall context of the ESF. EASA will not change the text.
7	AIRBUS	prop. ESF Compensating Factors Chapter 3e	4	quote: " <u>In case where MCDs obscure the view on electrical exit locators, information about the next emergency exit(s) will be provided to the passengers through photoluminescent exit signs on the MCD. The aisle length where such MCD partially or fully obscure the view on electrical exit locators shall not exceed 70% (for the 95th percentile male population) of the distance between two required electrically illuminated emergency exit locator signs [as per CS 25.811(d)(1)]</u> " UNQUOTE For the compliance demonstration the worst case analysis per aircraft model should be sufficient, especially because this requirement is considering a static position of the passengers in the aisle . But during an evacuation, the flow of passenger will move anyone into one direction. An obscuring of the sign for one step length may be acceptable.	Airbus request Please confirm that a worst case analysis per Aircraft Model is sufficient to demonstrate compliance for this requirement.	Requested	Not Accepted	Thank you for your comment. EASA does not agree to the comment EASA considers this statement is needed to understand the overall context of the ESF. It is not intended to provide additional guidance for compliance in context of <u>this</u> ESF. EASA will not change the text.

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8	FAA AIR-600	ALL	ALL	The Moveable Class Divider (MCD) photoluminescent exit signage blocks the electrically illuminated exit signs and the FAA does not consider the compensating features of legibility along the aisle after initial charging as a compensating feature. Photoluminescent signs during first flight of the day or maximum overnight flights may reduce the brightness of the exit sign usefulness. In addition, the FAA may not accept the procedures to obtain the necessary illumination level as a compensating feature.	For EASA and applicant awareness.	Not requested	Noted	Thank you for your comment. EASA acknowledges the comment, but will not change the text. In reference to comment 7 above, impacted legibility along the aisle is considered of temporary nature during an evacuation. The presented ESF should in fact exactly ensure that after initial charging during first flight of the day the brightness of the exit sign remains useful. Noted: The FAA may not accept the procedures to obtain the necessary illumination level as a compensating feature.
9	FAA AIR-600	3.b	4	<p>The ESF states: “The minimum required charging time and lighting condition to ensure the initial brightness have to be established in the Aeroplane Flight Manual operating procedures.”</p> <p>Using the AFM in this fashion is problematic in two ways. First this requirement would not only need to be in the operating procedures but would also need to be a Limitation as compliance to this procedure is mandatory in order for the safety objective to be met. Second, and more important, AFM Limitations should not be used to compensate for otherwise noncompliant system design.</p> <p>Consider whether it would be better if the ESF presented the safety objective as the requirement rather than one potential solution to the safety objective. For example, the ESF could instead specify “A means is provided to ensure the required initial brightness of the photo luminescent exit signs.” The AFM operating procedures is not the preferred method.</p>	The ESF could instead specify “A means is provided to ensure the required initial brightness of the photo luminescent exit signs.”	Recommended	Noted	Thank you for your comment. EASA acknowledges the comment, but will not change the text. In order to be presented for public consultation, EASA is following particular design proposals to be approved . <u>This</u> design solution included the proposal for an AFM limitation. Upon receipt of a different means to ensure the required initial brightness of the photo luminescent exit signs, this ESF can be reviewed and potentially changed to a more generic approach. Note: The introduction of the AFM Limitation is consistent with already approved limitations for photoluminescent floor proximity marking systems.

* Please complete this column using the drop-down list