

Comment-Response Document for Airbus A380 SC D-43

Commenter	Comment	EASA position
Boeing Commercial Airplanes	<p>1- Comment against SC Paragraph 1:</p> <p>Subsequent to the FAA's release of its parallel SC applicable to various Boeing airplane models, it was recognised that those SCs lacked certain clarity necessary to create a consistent set of criteria for affected seat suppliers to develop clearer criteria and definitions in order to effectively implement those SCs.</p> <p>The proposed SC for the A380 has the similar area that could benefit from improved definitions and criteria. Two specific areas are :</p> <p>1. The term "non-traditional" is being interpreted very differently across industry. Therefore, we recommend that the proposed SC incorporates the following definition of "traditional", which has been developed through continued and increased dialogue between industry and Civil Aviation Authorities :</p> <p><i>"Traditional : So long as items that are traditionally part of a standard economy/business class seat (arm caps; armrest closeouts such as end bays and armrest-styled centre consoles; food trays; video monitors; and video shrouds) do not serve purposes other than that for which they were intended, these items can continue to be exempted from needing to meet the special conditions.</i></p>	<p>EASA position:</p> <p>It was EASA's intention to harmonize as much as possible with the FAA Special Condition No. 25-358-SC that serves the same purpose. However, because the definition of "non-traditional, large, non-metallic panel" and "exposed" was already published in the supporting text to the above FAA special condition, EASA believes that it is not necessary to add this information into the special condition. This ensures that the SC Paragraph 1 is identical to the FAA Special Condition No. 25-358-SC paragraph 1.</p> <p>Also EASA agrees with the definitions of non-traditional, large, non-metallic panel" and "exposed" as given in the supporting text to FAA Special Condition No. 25-358-SC and as stated here again:</p> <p>Definition of "Non-Traditional, Large, Non-Metallic Panel":</p> <p>A non-traditional, large, non-metallic panel, in this case, is defined as a panel with exposed-surface areas greater than 1.5 square feet installed per seat place. The panel may consist of either a single component or multiple</p>

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	<p><i>(For example, end bays that extend to the floor still only serve the purpose of acting as a closeout of the armrest. However, if a centre console extends to form a privacy divider, or added 'furniture', the this no longer serves the purpose for which the traditional part was intended)"</i></p> <p>In addition to this proposed clarifying definition/criteria, we are working on further defining criteria for specific seat features. Although not complete at this time, we consider such criteria, developed through continued dialogue between CAA and industry, will be of immense benefit for effective implementation of this SC</p> <p>2. The proposed SC would also benefit from including allowances for parts that are not "exposed". Although the FAA's parallel SCs for Boeing models did include criteria for "exposed" parts, a clearer definition is needed to ensure consistent interpretation across the affected industry and simply implementation.</p> <p>We recommend that the following definition for "exposed" be include :</p> <p><i>"Exposed : Exposed panels include decorative panels and combinations of panels attached to the seat (e.g. large decorative panels surrounding the seat, large plastic seat back shrouds, etc.) that are visible within the passenger cabin. Non-structural panels covered by dress coverings are also considered exposed (these panels are not considered exposed, however, when covered by a seat cushion, or other traditional panels). Seat components not considered exposed are structural</i></p>	<p>components in a concentrated area. Examples of non-traditional areas include, but are not limited to: seat backs, bottoms and leg/foot rests, kick panels, back shells, credenzas and associated furniture. Examples of traditional exempted areas include: arm caps, armrest close-outs such as end bays and armrest-styled centre consoles, food trays, video monitors and shrouds. Non-traditional, large, non-metallic panels covered with traditional fabrics or leathers will be tested without their coverings or covering attachments.</p> <p>Clarification of "Exposed":</p> <p>"Exposed" is considered to include those panels directly exposed to the passenger cabin in the traditional sense, plus those panels enveloped such as by a dress cover. Traditional fabrics or leathers currently used on seats are excluded from these special conditions.</p>

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	<p><i>composite components of the seat considered to be part of the seat load path (e.g. seat pans, seat backs such as hoop and diaphragm combinations, honeycomb panels, etc.).</i></p> <p>Clarification will standardise the requirements across industry and allow efficient implementation.</p>	
Boeing Commercial Airplanes	<p>2- Comment against SC Paragraph 4:</p> <p>Boeing requests that clarification of “new” seat certification programs be included in this proposed SC. We consider that changes to seats that do not have an appreciable affect on the fireworthiness properties of non-traditional, large, non-metallic panels should not be defined as a “new” seat certification program.</p>	<p>EASA position:</p> <p>Many questions such as this have arisen since the intention to require improved flammability standards for seats was made public. The Agency now appreciates that there will be many situations where applicants feel that despite changes to seats being introduced, compliance to this SC should not be necessary. Discussions will need to take place to resolve such questions to mutual agreement of the applicants and airworthiness authorities involved. In the meantime this SC will be issued as is for the A380 programme.</p>