



COMMENT RESPONSE DOCUMENT

**EASA CRD of Equivalent Safety Finding related to CS29.807 (a) (4) at Amdt 3 “Emergency Exits”
Applicable to Airbus Helicopters (AH) H160
[Published on 07/07/2017 and officially closed for comments on 28/07/2017]**

Commenter 1: Martin Adam Design – 10.07.2017

Comment # 1

Because both seats adjacent to the Type IV exit may not always be occupied, the independent opening action must be no more difficult i.e. require no more strength, to operate, open and clear the opening than that of a single standard size Type IV exit when actuated by one person from either exit row.

EASA response: EASA agrees with the submitted comment.

The operation of the emergency exit from either seat should not require different efforts for the emergency opening. EASA is of the opinion that this is adequately covered by:

“Demonstration that the two means for window opening (including opening controls and mechanisms) are independent and that at least one is accessible and operable from each seat row. Additionally, operation of whatever of the two means should allow the window to be pushed out and provide emergency exit space opening for both seat rows.”

No changes have been made to the Final ESF in response to this comment.

Comment # 2

Also, although not directly relevant to exit type requirements, the opening of the large exit hatch during a ditching event presents challenges that may be difficult to overcome. The aircraft will for sure be employed in over-water operations and the worst case in reality (which I am not sure if it is directly covered by the airworthiness design standards) is with the rotorcraft inverted in the water. Opening a small hatch against water pressure will be



difficult, opening a large hatch could be almost impossible and even once water pressure is neutral (a very stressful situation) moving a large hatch through water may still not be easy.

EASA response: EASA disagrees with the submitted comment.

CS 29 is providing only minimum requirements, this is including the size of exits, also for ditching exits. Any larger exit would be acceptable (see CS 29.807 Passenger emergency exits). The comment is not addressing the advantage of larger exit opening dimensions e.g. the larger exit opening would allow the occupants to evacuate faster and easier in all evacuation conditions, including ditching.

No changes have been made to the Final ESF in response to this comment.

