



## COMMENT RESPONSE DOCUMENT

EASA CRD of Special Condition on installation of oblique seats  
Applicable to Airbus A330 NEO

[Published on 20 July 2017 and officially closed for comments on 10 August 2017]

**Commenter 1: Boeing Commercial Airplanes – Capt. Terry L. McVenes / Director, System Safety & Regulatory Affairs – 06 August 2017**

### **Comment # 1 - General**

AS6316 is the latest publication of oblique seats, which superseded ARP6316. Industry and regulators are using AS6316 as the current approach.

#### **Comment :**

[It is recommended to] replace [the reference to SAE ARP 6316] with “AS6316” throughout document.

**EASA response:** EASA agrees. The Special Conditions have been revised accordingly.

### **Comment # 2 - General**

The text of this SC is a copy of ARP6316.

However, ARP6316 has been superseded by AS6316. Industry and regulators are using AS6316 as the current approach.

#### **Comment :**

AS6316 calls out pertinent paragraphs from revision C of AS8049. There are significant differences between sections 5.3.6 and 5.3.9.4 in revisions B and C of AS8049. Please either refer directly to AS6316 as the acceptable means of compliance or replace the text in this SC to match AS6316, with reference to paragraph from revision C of AS8049.

**EASA response:** EASA agrees. The Special Conditions have been revised accordingly.



*Copy the response to comment #1 here*

*Comment # 3 - Special Condition - Additional performance standards for oblique facing seats*

Provide a consistent approach in definition of oblique seat requirements and meeting said requirements.

**Comment :**

Replace the tests and occupant injury criteria with the following sentence:

*“AS6316 provides an acceptable means of compliance to meet the requirements of JAR25.785(c) Change 13 for oblique facing seats.”*

This may be adjusted to include any variation EASA may wish to include over AS6316 criteria.

**EASA response:** *EASA partially agrees. The Special Conditions have been revised to reference SAE AS6316. The occupant injury criteria included in SAE AS6316 are considered by EASA as additional performance standards with respect to the ones already required by JAR/CS 25.562. Compliance with additional performance standards can be mandated only through the issuance of Special Conditions.*

*Comment # 4 - Special Condition - Selection of Test Conditions / Restraint Systems – ‘Airbags’ section*

Section referenced incorrectly.

**Comment :**

Section 10.3.4 does not exist in this SC.

Revise document to include section numbers, or revise reference in this paragraph.

**EASA response:** *EASA agrees. The Special Conditions have been revised accordingly.*

