COMMENT-RESPONSE DOCUMENT

CS 23.783 (b)
Proposed Equivalent Safety Finding
Cabin door configuration with respect to propeller discs; CS 23.783 (b)

Commentor:	UK CAA

Paragraph No: Applicant's Position issue 4

Comment:

UK CAA understanding of this is that the applicant's latest position is intended to respond to the last EASA position. It is our opinion that the applicant has not sufficiently responded because the engine can be started before the door is closed and locked. Although it is true that the pilot may be the last one to enter the aircraft for flight, the open door may induce someone to approach the aircraft when the engines are about to start. Furthermore we have some difficulty with the argument that the angle of the entry door will have any influence on the route taken by persons approaching the aircraft.

Response from EASA:

In order to better understand the aircraft configuration and the embark/disembark procedures, it is needed to consider the following:

1) During aircraft embark as per the AFM procedures: it is pilot responsibility to guide all passengers inside the aircraft, the pilot is the last person to enter in the aircraft. The passenger door is on the pilot's side. When the pilot is seated no other passenger can enter in the aircraft from this door. The pilot, at the end of the embarkation, and only after the closing and locking of the door can start the engines.

2) During aircraft disembarkation, as per the AFM procedures: it is pilot's responsibility to switch off the engines before opening the door. The pilot is the first person to disembark. With the door opening at 110° (as explained on the CRI) the pilot guides passengers outside the aircraft.

As per the above, it is EASA's opinion that nobody can approach the aircraft during engine start because all passengers are inside and the door is closed and locked. The possibility that someone approaches the aircraft with the doors closed is an event that can occur for any propeller aircraft.

No changes are proposed to the Equivalent Safety Finding.