

EASA Proposed CM-CS-003 Issue 01 – Installation of “Cargo Seat Bags” on Passenger Seats - Comment Response Document

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion	Comment is substantive or is an objection	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	Astra Airlines			I believe that this should go through with certain restriction.	a) For aircraft of up to 100 seats and without Fire Detectors, One Trained person on Fire Fighting should be carried on board. b) Above 100 seats Two seated at opposite ends of cabin c) For Double Decked aircraft, Two persons/Deck	Yes	No	Noted	The Certification Memorandum was not intended to list special conditions in general, but to inform potential applicants of the necessity to apply for a STC. Special conditions will be discussed and defined based on the applicant's particular design.
2	Astra Airlines			While being employed with a previous operator who changed the aircraft interior configuration from a full cargo (Canadian STC which finally did not get EASA approval) to a full Pax configuration, the need arose for the carriage of Mail and News Papers. Heavy duty cloth bags were used to protect the seats from the ink of the news papers, placed and restrained on the pax seats. The cabin was equipped with smoke detectors which we left operable after removal of the STC. In case we had removed the Smoke Detectors I suggested to the owner to have a person on board (trained on Fire Fighting Techniques) to monitor cabin area for smoke/fire. Similarly, I suggest the following for your ruling: <ul style="list-style-type: none"> - Passenger aircraft operators who contemplate the use of Cargo Bugs should: - Aircrafts with max seating capacity of 100 seats should carry, during cargo operation, a designated and trained on fire fighting techniques person on board, - For aircrafts of more than 100 seats, two skilled persons (one at front and one at rear) should be carried on and - For a two decks aircraft, two skilled persons per deck should be carried on. 				Noted	The Certification Memorandum was not intended to list special conditions in general, but to inform potential applicants of the necessity to apply for a STC. Special conditions will be discussed and defined based on the applicant's particular design.
3	Virgin Atlantic Airways	2	5/6	VAA has on several occasions responded to urgent requests for Humanitarian Relief flights. In some of these we have loaded non dangerous goods (tents , Plastic sheets, water sterilisation kits etc) in boxes / crates on the passenger seats in addition to cargo in normal cargo holds.	This CM has an exemption for such flights	Yes	No	Not Accepted	The Certification Memorandum will have no negative effect on operators wishing to perform flights such as those described by the commenter. The Certification Memorandum is only intended to point out that carriage of cargo in passenger cabins on a more regular basis by means of “Cargo Seat Bags” must be covered by an aircraft change classified as Major, i.e. an STC.
4	Virgin Atlantic Airways	2	5/6	VAA believes that there must be some occasions where the effects on Airworthiness could be classified Minor rather than the applying the statement a change requiring a special condition9s) shall be classified major	Why cannot the DOAH make the determination within better guidelines published by EASA?	Yes	No	Not Accepted	EASA has carefully assessed the issues surrounding “Cargo Seat Bags” and as explained in the Certification Memorandum has been unable to find a way to assess such aircraft changes as Minor. Any applicant however, can request that EASA agrees to such a change's classification being reassessed as Minor on the basis of the particular design.
5	Virgin Atlantic Airways	3.1	6/6	VAA believes that there must be some occasions where the effects on Airworthiness could be classified Minor	Replace ‘Only’ with ‘Normally’	No	Yes	Not Accepted	See response to comment No. 4.

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6	<i>AmSafe Bridport Limited</i>			I comment on behalf of AmSafe Bridport, we are neither a TC holder nor 'major' modifier of aircraft with respect to this CM. The CM is aimed at these persons ONLY. HOWEVER, we a supplier of the actual CARGO SEAT BAG. The CM does not refer to/detail them at all and this seems an oversight. We comment in general on the CM and offer a view, albeit we accept we are not experts in this type of TC work. We comment on the aspect of the CARGO SEAT BAG also, and we have some expertise in this area.				Noted	
7	<i>AmSafe Bridport Limited</i>	Sec. 2	5	EASA say, Conversely, Class A compartments are envisioned to be small compartments for the stowage for example crew luggage in the pilot compartment Why? The current passenger area now has lots of luggage (cargo) stored there on every flight. These are not small compartments. Many passenger cabin crew are there monitoring this and the passengers themselves and it is an acceptable level of risk (with regards to fire). If Cargo Seat Bags and cargo replace the passengers and their luggage (cargo), what is the difference? As long as crew (cargo seat bag crew) are there monitoring the situation. Thus, it is just an operational procedure matter as you suggest elsewhere in section 2. Thus, no design feature matters as you also say in section 2.	Amend the CM to include the 'operational procedures' required to fulfil the purpose. Amend the CM to remove the 'design features' as no design changes (product/hardware) are required.	Yes	Yes	Not Accepted	The commenter compares the situation of passenger baggage. This situation is covered by the requirement for the installation of hand fire extinguishers of appropriate type and number and the presence of cabin crew, trained in fire fighting procedures using this equipment. In the case of Cargo Seat Bags additional fire extinguishing equipment will be required along with an appropriate number of crew members with relevant training. The Certification Memorandum points out that these issues are significant airworthiness factors and that thus an aircraft change involving Cargo Seat Bags must be classified Major.
8	<i>AmSafe Bridport Limited</i>	Sec. 2	5	EASA say that the primary concern is in regards to fire detection. I agree completely.		Yes	No	Noted	
9	<i>AmSafe Bridport Limited</i>	Sec 3.1	6	I am not convinced that a Major Change or STC is needed for this. Yes, particular 'operational procedures' but not 'design feature' changes.	Amend the CM to include the 'operational procedures' required to fulfil the purpose. Amend the CM to remove the 'design features' as no design changes (product/hardware) are required.	Yes	Yes	Not Accepted	See response to comment No. 7.

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10	AmSafe Bridport Limited	N/A	N/A	<p>There is no current ‘airworthiness’ - ‘standards’, e.g. ETSO for the Cargo Seat Bag. AmSafe Bridport have manufactured ones since the 1980’s and got them ‘approved’ by its National Authority and other National Authorities. (Typically there are 1-seat, 2-seat & 3-seat sizes). Under new EASA rules this now falls under ADOA (ETSO) and the parts continue to be released with an EASA Form 1. I expect other manufacturers of Cargo Seat Bag have done the same. If CM (guidance) is to be issued for the airframe, then something ought to be also issued for the ‘Cargo Seat Bag’ itself.</p> <p>Typically Cargo Seat bag are single, double and triple (single seat, double seat and triple seat). The maximum gross weight per seat is typically 75kg (so single = 75kg, double = 150kg and triple = 225kg).</p> <p>Airlines have issued their own ‘specifications’ for Cargo Seat Bag, and these have been used by manufacturers for the design and certification by National Authorities.</p> <p>Flammability can always be a difficult area of interpretation for a product such as a Cargo Seat Bag that does not conform to CS25 (and other CS’s) precisely. For a number of good reasons (including such things as; seat belts, cargo and baggage tiedown equipment), the flammability requirement for such parts as been to Appendix F, Part 1, (a), (1), (iv). Going forward it is important that consistency is maintained for any future requirements for Cargo Seat Bag design, with respect to what has been used in the past (while ensuring safety of course). As EASA mentions in the draft CM, EASA is not aware of any adverse service experience from such operations, it can be assumed this would also apply to the Cargo Seat Bag product, hence the reason to use what exists as a good starting point.</p> <p>Cargo Seat Bags are typically manufactured from textile materials – fabric and webbing, (with metalwork also that fixes to seat track). As there are no current ‘standards’ for these products, some Airlines may well have approached textile companies to make such items who are not ‘aviation’ companies. Thus their expertise may not have taken account of such things as: flammability, fitting factors, maximum ultimate inertia factors and so on. I’d expect an aviation manufacturer to have taken account of these things. You’d hope that an Airline would also, but, as the Cargo Seat Bag is only replacing passengers and their luggage and there are no specification requirements on them, then the Airline may have been more relaxed in this area. EASA need to consider this aspect.</p>	Provide some CM (guidance) for the Cargo Seat Bag also. It is not part of the aircraft TC as such from a ‘product design and certification perspective’, it is more like a ETSO part, e.g. a ULD (C90), a Tyre etc. In other words, it is important that the Cargo Seat Bag performs to key performance criteria such as ultimate inertia forces, flammability, etc.	Yes	Yes	Not Accepted	The Certification Memorandum was not intended to list special conditions in general, but to inform potential applicants of the necessity to apply for a STC. Special conditions will be discussed and defined based on the applicant’s particular design.

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11	Airbus SAS	Cover Page 3rd section vs. Para 3.1 EASA Policy	1 / 6	The way this Certification memo is written is in contradiction with the declared definition of a certification memo as stated on the cover page. The language used is more in line with the establishment of new certification requirements than to the delivery of “non-binding material” or “complementary information”.	The Certification memorandum language is not appropriate and should be amended to reflect the intended function of a CM i.e. information, guidance, non-binding material ...	Yes	Yes	Not Accepted	The Certification Memorandum is only pointing out that the subject aircraft design change, i.e. converting a passenger cabin for the purposes of the carriage of large amounts of cargo is not covered by adequate or appropriate safety standards in CS25. This is thus a clear case needing the development of special conditions and thus must be classified as a major change. The Certification Memorandum sets out no specific design or operational requirements. The Agency thus sees no conflict with the declared principles of a Certification Memorandum.
12	Airbus SAS	General	All	<p>The aim of this Certification Memo should be to clarify the scope of applicability of EU-OPS-1.270 “Stowage of baggage and cargo”, with regard to carriage of cargo in passenger cabins, i.e.</p> <ul style="list-style-type: none"> - to define the kind of operations that are covered by EU-OPS-1.270, - to determine the boundaries (e.g. is full cargo operation covered by EU-OPS-1.270?) and - to provide guidance on what an operator should do to operate outside these boundaries while ensuring that the a/c still complies with the applicable airworthiness certification rules related to this kind of operation. <p>Airbus would like to remind that this type of operation (carriage of cargo in passenger cabin) is anticipated by operational rules –at least since JAR-OPS-1.270 and AMC thereto, but up to which extent (number of seat bags, occupancy,...) was not, and is not yet defined. Therefore, Airbus fully supports this CM’s purpose to clarify the scope of EU-OPS-1.270.</p> <p>However, we are concerned this Certification Memorandum, if published without modification, would immediately force Operators who have a very limited use of this practice to stop using it, pending an airworthiness approval is available.</p>	<p>Airbus proposes to revise this certification memorandum</p> <ul style="list-style-type: none"> - to include guidance and clarifications for issues identified in our comment summary, - to refer to JAR-OPS-1 AMC 1.270 currently being the sole transnational guidance material available until issuance of future EU implementing rules IR OPS-CAT and related AMC. - to state an <u>interim acceptability</u> of current “cargo-in-cabin”-procedures in EASA member-states conducted and approved under EU-OPS-1 plus national regulations. 	Yes	Yes	Not Accepted	The operational regulation references provided by the commenter concern how to utilise the approved baggage/cargo stowage areas on an aircraft, including those in the cabin. The Certification Memorandum is only pointing out that the additional stowage provisions provided by Cargo Seat Bags must also be approved, and more particularly, by means of an aircraft level change classified as Major.
13	Airbus SAS	Para 3.1 EASA Policy	6	In line with comments 1 and 2 above, this Certification Memo should clarify which kind of operation i.e. full cargo operations, justifies the need for certification activity such like Change to Type Design, STC and issuance of Special Conditions.	<p>Amend this paragraph to read:</p> <p>“The installation of cargo seat bags, for freighter type of operational use, should only be achieved in a cabin which configuration has been approved for this kind of operation. Such configuration approval may require application for a change to a/c Type design (modification or STC), which may necessitate issuance of Special Conditions.”</p> <p>In parallel, the EASA may wish to consider the need for qualification standards of these seat bags through establishment of dedicated E-TSO requirements.</p>	Yes	No	Not Accepted	<p>It is not understood why the commenter feels that an aircraft change to enable “freighter type” operation only “may” require application for an approval. Any and all aircraft changes must be approved. As explained in the Certification Memorandum, such a change must moreover be classified as Major.</p> <p>In regards to a future ETSO standard for Cargo Seat Bags, this might be considered on the basis of demonstrated need. If the commenter sees such a need, a request to EASA to develop such a standard can always be made.</p>

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14	Airbus SAS	Para. 3. EASA Certification Policy	6	<p>From our understanding cargo seat bags can be installed on passenger seats without any structural modifications to the Airbus aircraft. Cargo seat bags are usually fit onto the seats and strapped to the existing seat rails. Therefore, we do not consider that STC or any similar approvals are necessary. However, we do understand that the seat bags are certified and approved in accordance the applicable regulations and that specific operational conditions shall be agreed on. As freight transportation is conducted in the passenger cabin (no class C compartment) we consider to have trained crew available to intervene in case of a fire or other occurrences which requires a dedicated intervention.</p>	<p>Design changes are not the only way to address such operation.</p> <p>Operational procedures and trained personnel together with qualified equipment (e.g. seat bags E-TSO) would be a valid alternative.</p> <p>Further, AMC to JAR-OPS-1.270 “Cargo Carriage in the passenger cabin” explicitly covered this type of operation. Airbus recommends to include that AMC into this policy and into the guidance materials to future IR-OPS.CAT</p>	Yes	No	Not Accepted	<p>As explained in several responses above, cargo seat bags can only be utilised on an aircraft with a design approval.</p> <p>Even if an ETSO standard existed for such items, this would not authorise their installation.</p>
15	UK CAA			No comments				Noted	