

**EASA Proposed CM-CS-004 Issue 01 – Flammability Testing of Interior Materials - 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	Eurocopter	---	---	<p>As a matter of fact, this proposed CM addresses acceptable methods of compliance for fire protection of compartment interiors (§ 25.853, CS-25 Appendix F).</p> <p>Flame resistance requirements of § 853 are also used for cargo or baggage compartments under certain conditions.</p> <p>This is the case of CS 29.855(a), which calls CS 29.853(a)(1), (a)(2), and (a)(3) for small accessible cargo or baggage compartments.</p> <p>Nevertheless, the wording in CS 29.855(a) does not clearly state that § 29.855(a)(1) and 29.855(a)(2) are mutually exclusive and this leads to various interpretations.</p> <p><u>NOTE:</u> Our interpretation that § 29.855(a)(1) and 29.855(a)(2) are mutually exclusive is based on the following:</p> <ul style="list-style-type: none"> <li>- AC 29.855A clearly states (emphasis added) that "<i>Amendment 29-30 relaxes previous requirements by allowing small, accessible cargo and baggage compartments to be lined with passenger compartment materials rather than fire resistant materials</i>",</li> <li>- NPRM 88-7, which introduced amendment 29-30, states "[...] new standards would be added to specifically identify small, easily accessible compartments of less than 200 cubic feet volume and to allow use of passenger compartment interior materials including windows in those compartments. [...] The materials in these small, accessible compartments would meet the appropriate "vertical and horizontal burn test" standards specified in present Sec. 29.853(a)."</li> </ul>	<p>This flammability testing CM should be used as an opportunity to clarify that § 29.855(a)(1) and 29.855(a)(2) are mutually exclusive, i.e.:</p> <ul style="list-style-type: none"> <li>- fire-resistant materials shall be used as a general rule for cargo or baggage compartments, according to 29.855(a)(1),</li> <li>- as an exception to this rule, in the case of small accessible cargo or baggage compartments, as per conditions listed in 29.855(a)(2), flame-resistant requirements of § 29.853(a)(1), (a)(2), and (a)(3) are applicable instead of 29.855(a)(1).</li> </ul>	Yes	No	Not Accepted	The clarification proposed by Eurocopter is acknowledged by EASA. However, EASA finds that the scope of the EASA Certification Memorandum is not to provide clarifications on the scope of the flammability requirements included in CS-29 but rather to provide specific guidance about methods of compliance with such flammability requirements.
2	myTECHNIC Aircraft MRO Services	---	---	<p>This memorandum can also apply to the followings:</p> <ol style="list-style-type: none"> <li>1- Part 21 (related subparts), and</li> <li>2- Part 145 (fabrication)</li> </ol>		Yes	No	Not Accepted	The scope of the EASA Certification Memorandum is clearly stated in section 1.1. The reference to Part 21 (related subparts) and Part 145 would not provide any added value. In fact, it is obvious that whenever the showing of compliance with the requirements of any Subpart of Part 21, or with the requirements of Part 145, involves showing of compliance with the flammability requirements referenced in section 1.1, then the guidance provided by the EASA Certification Memorandum can be considered applicable.
3	UK CAA	---	---	No comment.		No	No	Noted	EASA acknowledges that UK CAA has no comment on the proposed Certification Memorandum.

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4	Embraer	1.2	4	<p>1.2. References:</p> <p>The Certification Memorandum refers to the Policy FAA PS-ANM-25.853-01-R1 issued on February 1<sup>st</sup> of 2013. Embraer suggests addressing the latest Policy revision FAA PS-ANM-25.853-01-R2 published on July 3<sup>rd</sup> of 2013.</p>		Yes	Yes	Accepted	<p>FAA PS-ANM-25.853-01-R2 was released after the start of the comment period for EASA proposed CM-CS-004.</p> <p>The only difference between FAA PS-ANM-25.853-01-R2 and FAA PS-ANM-25.853-01-R1 consists in the guidance related to the compliance with 25.853(a) for item 13 included in Attachment 2.</p> <p>Such guidance in FAA PS-ANM-25.853-01-R1 reads as follows:</p> <p><i>For Tapis Ultra leather™ and E-Leather Group Superlight™ products, testing one color substantiates all other colors because all values have significant margin with respect to the pass/fail criteria for the 12-second vertical test.</i></p> <p>While in FAA PS-ANM-25.853-01-R2 reads:</p> <p><i>For Tapis Ultra leather™ and E-Leather™ SL3UL, SL3SL, and SL3L products, testing one color substantiates all other colors because all values have significant margin with respect to the pass/fail criteria for the 12-second vertical test.</i></p> <p>In other words, the FAA Policy Statement has been revised to rectify the reference to the trade and product names for E-Leather™. The guidance material given in FAA PS-ANM-25.853-01-R1 has not been affected by the revision in question.</p> <p>Therefore, EASA CM-CS-004 will reference FAA PS-ANM-25.853-01-R2. No further public consultation is deemed necessary.</p>