Comment-Response Document (CRD) to Consultation Paper ref. CPTS-0000673 Issue 01 on "Design features that facilitate access to seats by passengers with reduced mobility" dated 15 July 2026

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1. Summary of the outcome of the consultation

During the public consultation of the above referenced proposed Special Condition from 15 July 2026 to 5 August 2026, EASA has received:

- 45 comments

- from 12 different commenters.

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2. Individual comments (and responses)

In responding to comments, EASA states its position as follows:

(a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.

(b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.

(c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.

(d) **Not accepted** — EASA does not agree with the comment or proposed change.

(General Comments)

Comment No. 1 **by: groWING.aero**

The term Accessibility Feature is used extensively in this SC. It is recommended to make it a defined term like:

Accessibility Feature: A movable aircraft-seat component or item of seat-associated furniture, such as a rotating or sliding seat section or movable partition, designed to facilitate the transfer of a passenger with reduced mobility to or from a seat. When deployed, the feature may extend into or obstruct an occupant's egress path or the aircraft aisle and must be stowed and retained when not actively being used for such a transfer.

This could reduce ambiguity and interpretation issues.

EASA response / Justification: Partially accepted

EASA agrees that repeated use of the term "accessibility feature" may benefit from clarification. However, EASA does not consider it necessary to introduce a formal definition in this SC. The applicability section already describes the intended scope sufficiently, namely movable portions of a seat or seat-associated furniture that facilitate transfer of a passenger with reduced mobility and that, when deployed, may obstruct an egress path.

Comment No. 14 **by: Airbus-Regulations-NS**

Airbus Commercial Aircraft are pleased to participate in this consultation.

Our experts and matter specialists have carefully reviewed this proposed SC.

Our comments are included into the CRT structure of the document.

In case of any questions please contact us.

Thank you.

Administrative note:

Airbus Document Classification: Not applicable

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Airbus Export Control Classification: Not technical

EASA response / Justification: Noted

EASA thanks Airbus for its participation in the consultation and for the submitted comments.

Comment No. 24 **by: FOCA (Switzerland)**

FOCA welcomes this special condition, which addresses a long-standing need and represents an important step towards improving accessibility and fostering the inclusion of passengers with reduced mobility by facilitating their access to air travel.

EASA response / Justification: Noted

EASA thanks FOCA for its support and for its comments.

Comment No. 36 **by: The Boeing Company**

Kara Charles The Boeing Company

Director, Regulatory Issues Management P.O. Box 3707, MC 081-60

Safety, Security & Airworthiness Seattle, WA 98124-2207

August 4, 2026

W-ESMC-REG-26-KC-36

Note to file:

The attached comprise comments from The Boeing Company submitted to EASA via the Comment Response Tool (CRT) in response to EASA Proposed Special Condition ref. CPTS-0000673 Issue 01 on 'Design features that facilitate access to seats by passengers with reduced mobility.

Thank you for your consideration of our input. Please direct any comments or questions to **GlobalRIM@exchange.boeing.com**.

Sincerely,

Kara Charles

Director, Regulatory Issues Management

Safety, Security & Airworthiness

EASA response / Justification: Noted

EASA thanks Boeing for its participation in the consultation and for the submitted comments.

SUBJECT

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Comment No. 38 **by: Safran Seats**

This SC is obviously applicable to new and novel installation that have both seats and furniture in close proximity or seats with integral furniture, in order to clarify which passenger commodities this applies to, please update the Subject (page 1) from "*Design features that facilitate access to seats by passengers with reduced mobility*" to: "*Design features that facilitate access to seats by passengers with reduced mobility* ***integrated in seat-associated furniture****"*

EASA response / Justification: Not accepted.
EASA does not agree to restrict the subject to features integrated only in seat-associated furniture. The SC is intentionally broader and addresses both movable portions of the seat itself and movable seat-associated furniture, as already stated in the text.

REQUIREMENTS

Comment No. 43 **by: Airbus Commercial Aircraft**

1. PAGE / PARAGRAPH / SECTION YOUR COMMENT IS RELATED TO:

Page 1 "requirement including amdt. "

The requirements listed at the beginning of the CRI include "CS-CCD at initial issue".

2. PROPOSED TEXT / COMMENT:

~~*CS-CCD.*~~

3. RATIONALE / REASON / JUSTIFICATION FOR THE COMMENT:

The listing of the CS-CCD implicitly means that the CCD can be proposed as a means of compliance to SC7. Does it really mean that CCD can be proposed as a means of compliance with SC 7? If not, what is the purpose of referring to the CS-CCD?

Airbus suggests removing the reference to the CS-CCD. In addition, CS-CCD is only valid for EU-operators, although Airbus considers that the scope of this SC may not be limited to EU-operators.

EASA response / Justification: Accepted.
EASA agrees that the reference to CS-CCD in the header could be misinterpreted. For clarity, this reference is removed.

IDENTIFICATION OF ISSUE:

Comment No. 2 **by: groWING.aero**

Related to "8)" and "a 5th percentile female and a 95th percentile male" would it be useful to add a reference to FAA AC 25-17A or is there an EASA reference available we are not aware off?

EASA response / Justification: Not accepted.

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EASA does not consider it necessary to add a reference in the SC text to FAA AC 25-17A. The percentile values are established anthropometric references. The SC remains performance-based, and applicants may use appropriate supporting material in their compliance demonstration.

Comment No. 39 **by: Safran Seats**

In the "Identification of issue" section, in order to clarify which passenger accommodations are subject to these special conditions, please update the text as follows:

"*EASA has received an application for a Supplemental Type Certificate (STC) covering the installation of design features* ***included in seat-associated furniture*** *that facilitate access to seats by passengers with reduced mobility in large aeroplanes*".

EASA response / Justification: Not accepted.
EASA does not agree to limit the identification of issue to design features included only in seat-associated furniture. The SC is also intended to address features incorporated in the seat itself.

ABBREVIATIONS:

Comment No. 18 **by: Airbus-Regulations-NS**

Page 2/ Abbreviations

"CS Certification Spefications "

PROPOSED TEXT / COMMENT: Suggested change

CS stands for Certification Specifications

RATIONALE / REASON for comment: Justification

Correction of a Typo

EASA response / Justification: Accepted.

Typo has been corrected in the final version of the CPTS.

M-TS-0000677

Comment No. 3 **by: Certification/Airworthiness Manager**

The §2 Special condition is not the one dedicated to this proposed Special Condition. It talks about "wing-flap controls position"

EASA response / Justification: Noted.
When the proposed SC was published the introductory text under Section 2 contained an editorial error unrelated to this SC. The erroneous text was removed during the public consultation phase.

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Comment No. 4 **by: Deep Lad - Delta Air Lines**

Under Special Condition technical specification number 3, it is also important that the flight attendant have a means to quickly and easily verify that the accessibility feature retention mechanisms are engaged, during a walk through of the aircraft cabin, in order to aid in their duties. Please consider including verbiage:

"The design must make clear to the flight attendant when all retention mechanisms are engaged and when any portion of retention mechanism is disengaged."

EASA response / Justification: Partially accepted.

EASA agrees that the cabin crew should be able to verify that the accessibility feature is properly stowed and retained. However, EASA does not consider it necessary to add the proposed detailed wording. This objective is already addressed by the requirements for stowage, retention, placards or equivalent means and instructions.

Comment No. 5 **by: Deep Lad - Delta Air Lines**

Under Special Condition technical specification number 9, not having a mechanism to keep accessibility feature in deployed position may create unsafe condition during transfer (for example, feature dropping down on the passenger or a part of the passenger during transfer).

EASA response / Justification: Not accepted.
EASA acknowledges the concern regarding safe transfer. However, the intent of item 9 is to ensure that the feature cannot remain fixed in a deployed position that may obstruct egress. The design may include means to control movement during transfer, provided these do not constitute a latch in the deployed position.

Comment No. 6 **by: Deep Lad - Delta Air Lines**

Some accessibility features are fully detachable. Additional consideration should be added, including the risk of being unable to reattach the furniture during flight and the operating instruction to secure loose furniture that could impede rapid egress and introduce hazard to occupants.

EASA response / Justification: Not accepted.
The Special Condition does not apply to detachable features. EASA does not consider it necessary to add specific provisions in this SC. However, EASA agrees that detachable features require appropriate consideration and may be addressed in a future revision of the Special Condition.

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Comment No. 7 **by: Deep Lad - Delta Air Lines**

Under special condition technical specification number 7.b - the way it is currently written reads as if the deployment of the PRM feature cannot happen at all during the evacuation. Ideally, it would acknowledge that procedures must be established to address the consideration of deployment. If deployment does occur, would compliance with technical specification number 10 be considered a method to show compliance with deplyment during evacuation.

EASA response / Justification: Not accepted.
EASA does not consider it necessary to add specific provisions in this SC to address inadvertent deployment of accessibility features after an emergency landing. EASA considers the intent of item 7(b) sufficiently clear. During an emergency evacuation, the feature is not to be deployed in a manner that prevents or obstructs the egress of other passengers. Item 10 supports this objective but does not replace the need for the operational limitation in item 7(b).

Comment No. 8 **by: KLM**

Editorial Error (Page 3, Section '2) SPECIAL CONDITION'):

- **Comment:** There is a significant editorial error in the general introductory text under '2) SPECIAL CONDITION' on page 3. The text incorrectly references 'cockpit design,' 'wing-flap controls,' and 'compensating factors in Section 3,' which are irrelevant to this Special Condition.
- **Recommendation:** This paragraph should replaced with a correct and relevant introductory statement regarding the accessibility features for passengers with reduced mobility, or entirely removed, to ensure the clarity and validity of the document.

Item 7b (Page 4):

  - **Comment:** The phrasing "may prevent or obstruct" leaves room for interpretation. An absolute requirement is necessary for emergency situations.
  - **Recommendation:** We propose strengthening the wording to: "b. during an emergency evacuation, the accessibility feature **must not** prevent or obstruct the egress of **any** other evacuating passenger."

- **Item 8 (Page 4):**

  - **Comment:** This item represents the most critical concern in the proposed SC. The inclusion of "or procedures must be established to ensure that the occupant is relocated" fundamentally conflicts with the 90-second evacuation principle of **CS 25.803(a)** and the realities of emergency evacuations. Relocating passengers, especially passengers with reduced mobility, during a rapidly evolving emergency is unrealistic, unsafe, and would severely impede evacuation. Such reliance on procedures in an emergency is not an acceptable compensating factor for a physical obstruction.

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◦ **Recommendation:** We propose to remove this phrase**.** The SC must unequivocally state that the accessibility feature, even when deployed for passengers with reduced mobility transfer, **must never** impede the unassisted access of any other evacuating passenger to the main cabin aisle without significant delay. The design must inherently guarantee a clear path.

• **Item 8 (Page 4):**

◦ **Comment**: The term "egress path available to the occupant of any seat" in Item 8 is ambiguous. The "Identification of Issue" on Page 2 clearly distinguishes between obstruction of the "egress path of cabin occupants to the aisle" and obstruction of "the aisle itself." Item 8's phrasing does not explicitly cover obstruction of the main aisle itself.

◦ **Recommendation**: For consistency and clarity, we recommend aligning the terminology in Item 8 with the precise problem definition in the "Identification of Issue" (Page 2). This ensures explicit coverage of all identified obstruction scenarios (i.e., path from seat to aisle, and obstruction of the main aisle itself), thereby guaranteeing the entire egress path remains uncompromised.

EASA response / Justification:

Editorial Error (Page 3, Section '2) SPECIAL CONDITION'): Noted

When the proposed SC was published the introductory text under Section 2 contained an editorial error unrelated to this SC. The erroneous text was removed during the public consultation phase.

Item 7b (Page 4): Not accepted

EASA does not agree to adopt the proposed absolute wording in item 7(b). The text of the Special Condition has the intent to ensure that the accessibility feature is not intentionally deployed during an emergency evacuation.

Item 8 (Page 4), emergency evacuation: Not accepted

EASA does not agree with the changes proposed by the Commenter. The intent of Special Condition 8 is to ensure that, when the accessibility feature is deployed, access to the main aisle is not compromised for any passenger. In an emergency evacuation scenario, the deployment of the accessibility feature should not affect evacuation of any cabin occupant. CS-25 Appendix J specifies the 90 s limit for the evacuation time, however CS-25 Appendix J does not require consideration of presence of passengers with reduced mobility in the cabin.

Item 8 (Page 4), obstruction to the main aisle: Accepted

The SC has been revised to introduce the change proposed by the Commenter.

Comment No. 9 **by: KLM**

• **Additional Considerations**

• **Continuing Airworthiness (Part M):** The critical nature of retention mechanisms (Item 4) necessitates robust maintenance instructions and Airworthiness Limitations (AWLs) as part of the STC approval. These must be integrated into the operator's **Part M** approved continuing airworthiness management system.

• **Operational Procedures & Training (Part CAMO / Part ORO):** The requirements for placards (Item 6) and operational instructions (Item 7) necessitate corresponding clear operational

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procedures, crew training, and inclusion in the operator's operations manual, in line with **Part ORO.MLR.105 and ORO.GEN.110**.

• **Human Factors (CS-CCD):** If the feature includes crew interfaces, relevant human factors principles from **CS-CCD** should be considered to ensure intuitive and unambiguous operation, especially under stress.

• **Interference with Emergency Equipment (CS 25):** An explicit statement is needed that the design and operation of the feature must not impede the accessibility or operation of other required emergency equipment (e.g., oxygen masks, emergency lighting, fire extinguishers, emergency exits), in accordance with relevant **CS 25** sub-paragraphs.

• **Malfunction Scenarios:** Considerations are needed for scenarios where the feature malfunctions (e.g., gets jammed) and cannot be stowed with the specified 111 N force. The design or associated emergency procedures must address such situations to prevent an unmanageable obstruction.

EASA response / Justification: Noted.
EASA acknowledges the comments regarding continuing airworthiness, operational procedures, human factors, emergency equipment, and malfunction scenarios. These aspects may be relevant as part of the overall certification and operational implementation, but EASA does not consider it necessary to expand this SC to explicitly address existing regulations (existing regulations do not need to be repeated in this SC).

Comment No. 10 **by: UK CAA**

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Commentor:

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UK CAA

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Page No: 3

Paragraph No: 7), 7) a. and 7) b.

Comment: UK CAA suggests that item #7) includes requirements for training materials and operating instructions, and not only “instructions regarding the proper operation”.

Justification: The UK CAA welcomes harmonisation on Special Conditions which are common to UK and European compliance consideration, due to the maintained harmonisation of EASA CS25 and UK CAA CS25, and intend to consider the final published EASA SC on design features facilitating accessibility to seats, for UK rulemaking as appropriate.

However, to support the EASA public consultation, UK CAA suggest the following comment regarding proposed item #7).

The UK CAA Special Condition UK.SC.D.0001 Issue 1 “Installation of Mini-suite Type Seating Applicable to Twin Aisle Large Aeroplanes” includes consideration, specifically, for a PRM element of ‘Moveable Walls’.

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UK.SC.D.0001 issue 1 item #28 is similar in the intent to EASA's proposed item #7), however includes consideration for training materials *and* operating instructions.

UK CAA considers there to be a multitude of different accessibility features to which the proposed EASA SC may apply, and in each case compliance to the requirements of OSD-CC may require careful consideration and assessment, in addition to compliance with the proposed SC.

This is with specific consideration for potential impact on design-related element(s) impacting

on either normal procedures, or on emergency procedures, or on both normal and emergency procedures (per the requirements of CS-CCD).

UK CAA considers that by item #7) of the proposed SC requiring only "instructions regarding the proper operation", an applicant preparing to comply with this requirement may not be driven to apply the appropriate considerations for such an impact to OSD-CC resulting from the installation of a PRM feature. For this reason, the CAA proposes an alternative wording.

Proposed Text:

7) *Training materials and operating instructions* regarding the proper operation and configuration of the accessibility feature must be provided and must contain the information that:

a. the accessibility feature must be stowed immediately when not transferring a person of

reduced mobility and during taxi, takeoff and landing.

b. during an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of any other evacuating passenger.

EASA response / Justification: Partially accepted.

EASA agrees with the intent that the information provided should support operational use and training. However, EASA does not consider it necessary in this SC to explicitly prescribe "training materials" in addition to instructions. The existing wording is considered sufficient.

Comment No. 11 **by: UK CAA**

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Commentor:

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UK CAA

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Page No: 3

Paragraph No: 8)

Comment: UK CAA notes the proposed wording of item #8) differs from equivalent considerations previously published by the UK CAA and FAA, however UK CAA notes that the intent of EASA's proposed item #8) remains consistent with both cases. No further comment.

Justification: N/A

Proposed Text: N/A

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EASA response / Justification: Noted.
EASA appreciates the comment and the confirmation regarding the consistency of intent.

Comment No. 12 **by: Deep Lad - Delta Air Lines**

In reference to Special Condition Technical Specification number 8, the requirement to have procedures to relocate occupant in "any" affected seat is a major burden on airline operator. The other technical specifications in this special condition clearly emphasize that the PRM feature is not to be used during TTL and there is testing conducted by seat OEM to demonstrate compliance with these requirements. Thus, if the accessibility feature were to be deployed, this would most likely be during an in-flight condition, where the feature is meant to be used. While it makes sense to relocate if the egress path is blocked for the specific passenger in the seat with PRM feature deployed, the requirement to evaluate occupants in "any" seat and potentially relocate everyone affected may not be feasible, especially on flights that are full. In addition, technical specification number 10, ensures that the accessibility feature must be designed to be stowed using a force of 25 lbs or less, which helps to alleviate egress path concerns for "any" occupant. Some lavatory doors in the cabin could act as blocking certain egress path, but we do not relocate passengers sitting close to lavatories, because the door can be easily moved aside. The accesibilty feature would function in a similar way.

EASA response / Justification: Not accepted.
EASA does not agree that the reference to “any” seat creates an unreasonable burden. If deployment of the accessibility feature affects the egress path to the main aisle from another seat, the safety implications for the occupant of that seat must be addressed. Special Condition 10 does not remove the need for this assessment.

Comment No. 13 **by: Deep Lad - Delta Air Lines**

With reference to Special Condition Technical Specification number 5, the current verbiage could results in some awkward positioning of the release switch/button for the intended user. Is it possible to revise the verbiage to state that the control will not be within easy reach of the seated and belted passenger?

EASA response / Justification: Not accepted.
EASA considers the current wording in item 5 sufficiently objective and enforceable. The suggested wording “within easy reach” would introduce ambiguity.

Comment No. 15 **by: Airbus-Regulations-NS**

Page 3 - 1. APPLICABILITY

PROPOSED TEXT / COMMENT: Suggested change

This SC is applicable to Large Aeroplanes with design features installed facilitating access to seats by passengers with reduced mobility . Access to the seat may be enhanced through the rotation or

the sliding of a portion of the seat itself or of the seat-associated furniture (e.g. a movable wall for a minisuite). The accessibility feature, when deployed, may partially or fully block the egress path of cabin occupants***. These special conditions are not applicable to design features that do not impede a doorway / egress path.***

RATIONALE / REASON for comment: Justification

The proposed wording suggests that all installed design features that are moving or sliding to facilitate seat access for passengers with reduced mobility, must meet the Special Conditions. The Special Conditions should apply to movable parts which, when deployed, are considered as a temporary door. Even if it is intended for temporary use as its sole purpose is to facilitate the transfer of the passenger in and out of the PRM-seats during cruise or when the airplane is on the ground, it may impede the evacuation. The special conditions should apply only to PRM features that, when deployed, may partially or fully block the egress path of cabin occupants.

EASA response / Justification: Accepted.
EASA agrees that the applicability text should more clearly indicate that the SC is intended for features that, when deployed, may obstruct an egress path. The text is clarified accordingly.

Comment No. 16 **by: Airbus-Regulations-NS**

Page 3 - Special Condition 5

"Either the primary or secondary retention mechanism controls must be positioned such that a seated and belted passenger will not be able to operate them."

PROPOSED TEXT / COMMENT: Suggested change

We suggest adding an alternative condition when using discrete mechanical means that are hidden or not obvious to a person in the seat or in nearby seats or standing in the aisle.

RATIONALE / REASON for comment: Justification

Harmonisation with existing standard: This criterion of discrete latching is considered for armrests for disabled passengers in Aerospace Recommended Practice ARP5526, Revision D, Section 3.6. (Per EASA CM No.: CM-CS-007 Issue 01 §3.1.4, Armrest for disabled passengers : Encroachment into the minimum aisle width envelope defined by CS 25.815 is allowed when following Aerospace Recommended Practice ARP5526, Revision D, Section 3.6.).

EASA response / Justification: Accepted.
The text of Special Condition 5 has been revised to address this comment.

Comment No. 17 **by: Airbus-Regulations-NS**

Page 3 Special Condition 6:

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"Appropriate placards, or other equivalent means, must be provided to ensure that each accessibility feature is stowed, with the retention mechanisms engaged, during taxi, take-off and landing and when not in use."

PROPOSED TEXT / COMMENT: Suggested change

• Under 'other equivalent means' , one could suggest using discrete mechanical means that are hidden or not obvious to a person in the seat or in nearby seats or standing in the aisle. In that case, cabin crew instructions per Special Condition 7) should also detail how to ensure that the feature is stowed with the retention mechanisms engaged.

• It is unclear whether or not the use of the PRM function should be authorized " during turbulence"

RATIONALE / REASON for comment: Justification

• For homogeneity with the criterion of discrete latching that is considered for armrests for disabled passengers in Aerospace Recommended Practice ARP5526, Revision D, Section 3.6. Like for the removable armrest, the movable part could be retained in the taxi, takeoff, and landing position by a discreet mechanical means (e.g., a latch) that is hidden or not obvious to a person in the seat or in nearby seats or standing in the aisle , to prevent inadvertent or accidental operation under normal use of the seat. This could be an alternative to the placard;

• It should be clarified if the deployment of the moveable parts is to be allowed during turbulence to enable a PRM to return to the seat , e.g. while coming back from a lavatory?

EASA response / Justification: Partially accepted.
EASA agrees that "other equivalent means" may include design solutions other than placards, provided that the safety objective is met. However, EASA does not consider it necessary to specify examples in the SC. With respect to turbulence, use in phases of flight other than taxi, take-off and landing remains subject to safe operation and operator procedures.

Comment No. 44 **by: Airbus Commercial Aircraft**

1. PAGE / PARAGRAPH / SECTION YOUR COMMENT IS RELATED TO:

Page 3 - SC 7:

"Instructions [...] must be provided [...]"

2. PROPOSED TEXT / COMMENT :

"Instructions [...] must be provided to the operators [...] "

3. RATIONALE / REASON / JUSTIFICATION for the Comment:

It is understood that the instructions must be included in the certification dossier for demonstrating compliance with SC7. But if the instructions must be provided to operators, it should be explicitly written in the SC, as proposed.

EASA response / Justification: Partially accepted.
EASA agrees that the instructions are intended to support operators' safe use of the feature. However, EASA does not consider it necessary to add the wording "to the operators", as this is already implicit.

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Comment No. 45 **by: Airbus Commercial Aircraft**

1. PAGE / PARAGRAPH / SECTION YOUR COMMENT IS RELATED TO:

Page 3 - SC 7:

"Instructions regarding the proper operation and configuration of the accessibility feature [...]"

2. PROPOSED TEXT / COMMENT:

"The following limitations in the AFM, or other equivalent means must be established for:
~~Instructions regarding the proper operation and configuration of the accessibility feature must be provided and must contain the information that:~~

a. The accessibility feature must be stowed immediately when not transferring a person of reduced mobility and during taxi, takeoff and landing.

b. During an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of any other evacuating passenger".

3. RATIONALE / REASON / JUSTIFICATION FOR THE COMMENT:

Should it be understood that these instructions are a detailed description of the accessibility feature (i.e. movable parts, controls and indicators, proper configuration for TTOL) and how to operate it (i.e. how to deploy the feature, how to stow and secure it)?

This information is usually developed and provided to operators for consideration to develop their operating manual and crew training, and this information is usually provided in non-approved manuals

(e.g. CCOM). Requiring this information via certification requirements would make the data approved and any future changes to this data would require to follow the Part-21 certification process. Is it the EASA intent?

Airbus proposes that the SC 7 requires the establishment of the following limitations in the AFM, or other equivalent means:

- The accessibility feature must be stowed immediately when not transferring a person of reduced mobility and during taxi, takeoff and landing.
- During an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of any other evacuating passenger.

Airbus proposes that SC 7 does not require to provide the detailed description of the feature and its operation. This is managed via non-approved manuals by the TC/STC holder in order to provide operators with the necessary information to comply with the above limitations.

EASA response / Justification: Not accepted.
EASA does not agree to replace the requirement for instructions with a requirement limited to AFM limitations or equivalent means. The SC addresses the proper operation and configuration of a novel cabin feature and therefore appropriate instructions are necessary.

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Comment No. 19 **by: Airbus-Regulations-NS**

Page 4- SC 9 :

"No mechanism to latch the accessibility feature in its deployed position is allowed. "

PROPOSED TEXT / COMMENT: Suggested change The operation of the accessible feature might require it to be secured in an intermediate state for safe operation /safe handling by a cabin crew to assist the PRM e.g. in-flight turbulence. A re-wording should be considered.

RATIONALE / REASON for comment: Justification It is understood that the accessible feature is to be operated during the flight. The operation of the accessible feature might require it to be secured in an intermediate state for safe operation /safe handling by a cabin crew to assist the PRM e.g. in-flight turbulence.

EASA response / Justification: Not accepted.
EASA acknowledges that an applicant may wish to stabilise the feature during use. However, item 9 is intended to avoid a deployed-position latch that could maintain an obstruction in the egress path.

Comment No. 20 **by: Airbus-Regulations-NS**

Page 3 SC 7-b.

7-b. "during an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of any other evacuating passenger. "

PROPOSED TEXT / COMMENT: Suggested change

Comment / consideration.

RATIONALE / REASON for comment: Justification

The consequence of this requirement might be that a person/PRM depending on the (full) deployment of the accessibility feature must remain seated until all other passengers in the cabin area have evacuated.

EASA response / Justification: Noted.
EASA recognises the operational implication identified by the commenter. This is consistent with the safety objective of item 7(b), namely that the feature must not be deployed in a way that prevents or obstructs the egress of other cabin occupants.

Comment No. 21 **by: Airbus-Regulations-NS**

Page 3 and 4 SC-8

"If the accessibility feature, when in use, deploys into the egress path available to the occupant of any seat, it must be shown that a 5th percentile female and a 95th percentile male will be able to reach the main aisle from that seat, or procedures must be established to ensure that the

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occupant is relocated. Compliance with this requirement must be demonstrated for each different configuration "

PROPOSED TEXT / COMMENT: Suggested change

• Comment / consideration to remove the possibility to relocate the occupant.

• Additional testing may be needed to demonstrate that the occupant can reach the main aisle with the feature stowed.

• Clarification on the meaning of 'egress path'

RATIONALE / REASON for comment: Justification

• The use of the feature is limited to on ground (before taxi for takeoff or after taxi for landing) or in flight. If passenger(s) is potentially blocked by the deployed feature, it must be relocated (= re-seated?). This may cause some trouble in the cabin, and may not be practical especially if the aircraft is fully occupied.

• Depending on the design, a test to reach the aisle may be conducted with the feature undeployed (e.g. E/C middle seat, window seat)

• Is 'egress path' meaning here limited to step out to the main aisle? If yes the accessibility should also not block any main evac route.

EASA response / Justification: Partially accepted.
EASA agrees that clarification of the term "egress path" may improve consistency of interpretation. However, EASA does not agree to remove the possibility of relocation from item 8.

A relocation possibility is the easiest alternative solution that could be kept for this generic Special Condition. If the applicant does not want to make use of such alternative, the relocation possibility may be removed on project level.

Comment No. 22 **by: Airbus-Regulations-NS**

Page 3 SC 4:

"The design of the accessibility feature must include a primary and a secondary backup retention mechanism that locks the feature in the stowed position. The retention mechanisms must independently withstand the emergency landing conditions specified in CS 25.561. "

PROPOSED TEXT / COMMENT: Suggested change

Request for clarification on the secondary backup retention mechanism.

RATIONALE / REASON for comment: Justification

Is the "secondary backup retention mechanism" used when the primary fails or a kind of double-latching philosophy and both have to be engaged to answer the SC?

EASA response / Justification: Noted.
EASA confirms that item 4 requires two independent retention mechanisms which must be both engaged during taxi, take-off and landing and must independently withstand the emergency landing conditions of CS 25.561.

Comment No. 23 **by: Airbus-Regulations-NS**

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Page 3 - SC-2

"The accessibility feature may be deployed only in phases of flight other than taxi, takeoff and landing".

PROPOSED TEXT / COMMENT: Suggested change

This SC may be deleted or reworded.

RATIONALE / REASON for comment: Justification

EASA published 2 versions of the SC with the same issue (issue 1) and the same date (15 JUL 2026). It is unclear if the wording of the SC is accurate or needed or belonging to the PRM design features addressed by this SC.

EASA response / Justification: Not accepted.
EASA agrees that the consultation package initially published contained an editorial inconsistency. The Consultation Paper was corrected for clarity. EASA confirms that Special Conditon 2 needs not be deleted or reworded.

Comment No. 25 **by: FOCA (Switzerland)**

2) SPECIAL CONDITION

In lieu of showing direct compliance with the CS identified in chapter 1.1, and provided that the below compensating factors in Section 3 are demonstrated, the cockpit design may feature wing-flap controls position not fully aft of the throttle quadrant.

-> The reason for that is that in our opinion, the SC contains text that is not relevant to the subject of the proposed Special Condition and shoud therefore be amended.

EASA response / Justification: Noted.
When the proposed SC was published the introductory text under Section 2 contained an editorial error unrelated to this SC. The erroneous text was removed during the public consultation phase.

Comment No. 26 **by: FOCA (Switzerland)**

2)5): We would like to suggest amending the text as follows: *The primary and secondary retention mechanism controls must be positioned such that a seated and belted passenger will not be able to operate both of them by means of a single action or involontarily.*

-> The reason for that is, that the wording of the proposed condition seems to indicate that the design may lead to difficulties for the person with reduced mobility to leave her seat in case of an emergency evacuation. It is noted that a person with reduced mobility may still be capable to execute the cabin crew instructions in case of an evacuation and in doing so increase her chances to survive the condition that has triggered an emergency evacuation. This said, it is understood that the evacuation of the person with limited shall occurr in accordance with to be established procedures (See also the second-to-last comment).

EASA response / Justification: Not accepted.

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EASA does not agree with the proposed revision. Item 5 is intended to ensure that the seated and belted passenger cannot operate the retention mechanism control. The proposed wording would not fully address this safety objective.

Comment No. 27 **by: FOCA (Switzerland)**

2)9): We would like to suggest amending the text as follows: *In case a mechanism to latch the accessibility feature in its deployed position exists, it's design will allow for the latch to be easily disengaged without the use of excessive force/torque and without the use of special tools.*

-> The reason for that is, that there might be reasons that justify having a latch for the accessibility feature (e.g. the person leaving her seat during the cruise phase).

EASA response / Justification: Not accepted.
EASA does not agree to allow a latch in the deployed position, even if easily disengaged. The safety objective of item 9 is to prevent the feature from being maintained in a deployed position that could prevent or obstruct the egress of other cabin occupants.

Comment No. 28 **by: FOCA (Switzerland)**

In addition to the specifications listed, we would like to suggest that the following specification be added, which is not mentioned in the proposed SC:

Cabin Crew OSD need to be amended to cover the description and use of the accessibility features. Moreover the OSD should include the normal/abnormal/emergency procedures related to the use of the accessibility features as well as any specific action to be taken or instruced by the Cabin Crew in case of an emergency evacuation.

EASA response / Justification: Partially accepted.
EASA agrees that cabin crew information and procedures may need to be updated where such a feature is installed. However, EASA does not consider it necessary to add an explicit OSD requirement in this SC.

Comment No. 29 **by: FOCA (Switzerland)**

In addition to the specifications listed, we would like to suggest that the following specification be added, which is not mentioned in the proposed SC:

If a passenger with reduced mobility travels with a service dog, specific requirements and procedures for cabin crew regarding the handling of the service dog should be defined.

-> Note: Alternatevely this specific topic may be addressed by or combined with an operational requirement.

EASA response / Justification: Not accepted
EASA considers the handling of service dogs to be outside the scope of this SC.

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Comment No. 30 **by: The Boeing Company**

COMMENT #1 of 6

Type of Comment (check one)

Non-Concur*| *Substantive* | *Editorial

X

Page number and paragraph of the proposed document that is of concern.

Page: 3,Para: 1

What is the proposed requirement or text?

The proposed text states:

This SC is applicable to Large Aeroplanes with design features installed facilitating access to seats by passengers with reduced mobility.

What about this proposed requirement do we want changed?

We recommend revising the text as follows:

This SC is applicable to Large Aeroplanes with design features installed facilitating access to seats by passengers with reduced mobility and aligns with FAA Exemption 10879C conditions 26-34.

Why is the change justified?

Where an EASA SC and an existing FAA exemption cover materially the same design feature, alignment (or a stated basis for divergence) reduces certification burden for applicants pursuing both EASA and FAA approval on the same configuration. It also reduces the risk of an applicant satisfying one authority's compensating factors while missing a materially different requirement under the other.

EASA response / Justification: Not accepted.
EASA does not agree to reference FAA Exemption 10879C in the applicability statement. This SC is issued under the EASA regulatory framework and remains self-standing. However, the SC has been developed considering the objective to harmonize with the FAA Exemption.

Comment No. 31 **by: The Boeing Company**

COMMENT #2 of 6

Type of Comment (check one)

Non-Concur | ***Substantive***| ***Editorial***

X

Page number and paragraph of the proposed document that is of concern.

Page: 3, Para: 1

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What is the proposed requirement or text?

The proposed text states:

The accessibility feature, when deployed, may partially or fully block the egress path of cabin occupants.

What about this proposed requirement do we want changed?

We recommend revising the text as follows:

For this SC, the accessibility feature, when deployed, ~~may~~ partially or fully blocks the egress path of cabin occupants.

Why is the change justified?

If the accessibility feature, when deployed, does not partially or fully block the egress path of the cabin occupants, the SC would not be necessary.

EASA response / Justification: Accepted.
EASA agrees that the applicability should be clarified to indicate that the SC concerns features that, when deployed, obstruct the egress path. The wording is adjusted for clarity.

Comment No. 32 **by: The Boeing Company**

COMMENT #3 of 6

Type of Comment (check one)

Non-Concur | ***Substantive*** | ***Editorial***

X

Page number and paragraph of the proposed document that is of concern.

Page: 3, Para: 2.2, 2.3

What is the proposed requirement or text?

The proposed text states:

2) The accessibility feature may be deployed only in phases of flight other than taxi, takeoff and landing.

3) During taxi, take-off and landing and when not in use, the accessibility feature must be stowed with the retention mechanisms engaged.

What about this proposed requirement do we want changed?

We recommend revising the text as follows:

2) During taxi, take-off and landing and when not in use, the accessibility feature must be stowed with the retention mechanisms engaged. The accessibility feature may be deployed only in phases of flight other than taxi, takeoff and landing.

~~3) During taxi, take-off and landing and when not in use, the accessibility feature must be stowed with the retention mechanisms engaged.~~

Why is the change justified?

Combining 2.2 and 2.3 into one condition simplifies the list.

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EASA response / Justification: Partially accepted.
EASA agrees that items 2 and 3 can be streamlined without changing their intent. However, the current structure of the special conditions is considered more flexible and therefore will be maintained.

Comment No. 33 **by: The Boeing Company**

COMMENT #4 of 6

Type of Comment (check one)

Non-Concur | ***Substantive*** | ***Editorial***

X

Page number and paragraph of the proposed document that is of concern.

Page: 3, Para: 2.7

What is the proposed requirement or text?

The proposed text states:

Instructions regarding the proper operation and configuration of the accessibility feature must be provided and must contain the information that:

a. the accessibility feature must be stowed immediately when not transferring a person of reduced mobility and during taxi, takeoff and landing.

b. during an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of any other evacuating passenger.

What about this proposed requirement do we want changed?

We recommend revising the text as follows:

Training and operating ~~i~~instruction~~s~~ materials regarding the proper operation and configuration of the accessibility feature must be provided to the operator for incorporation into their flight attendant training programs and appropriate operational manuals and must contain the information that:

a. the accessibility feature must be stowed immediately when not transferring a person of reduced mobility and during taxi, takeoff and landing.

b. during an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of any other evacuating passenger.

Why is the change justified?

Better aligns with FAA Exemption 10879C for harmonization. The original wording also did not specify who must receive the instructions.

EASA response / Justification: Partially accepted.
EASA agrees that the instructions are intended to support operator procedures and training. However, EASA does not consider it necessary to adopt the proposed wording, because the definition of training, if required, will be automatically covered by the EASA OSD process.

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Comment No. 34 **by: The Boeing Company**

COMMENT #5 of 6

Type of Comment (check one)

Non-Concur |

|

Page number and paragraph of the proposed document that is of concern.

Page: 4, Para: 2.9

What is the proposed requirement or text?

The proposed text states:

No mechanism to latch the accessibility feature in its deployed position is allowed.

What about this proposed requirement do we want changed?

We recommend revising the text as follows:

Unless the accessibility feature does not encroach into any egress path when deployed, ~~N~~no mechanism to latch the accessibility feature in its deployed position is allowed.

Why is the change justified?

The current requirement is too restrictive because it does not allow a deployable accessibility feature to be held in place even when it is fully outside any egress path or delethalization zone. If the feature does not obstruct evacuation, interfere with passenger movement, or create a safety hazard when deployed, then a latch or holding mechanism should be allowed to prevent unwanted movement while in use.

This comment only applies if Comment #2 for page 3 paragraph 1 is not accepted.

EASA response / Justification: Not accepted.
EASA does not intend to allow a latch to maintain the feature in a deployed position that affects the egress of any occupants. Special Condition 9 has that safety objective. EASA agrees that the applicability should be clarified to indicate that the SC concerns features that, when deployed, obstruct the egress path.
See also the response to Comment 31.

Comment No. 35 **by: The Boeing Company**

COMMENT #6 of 6

Type of Comment (check one)

Non-Concur | ***Substantive*** | ***Editorial***

X

Page number and paragraph of the proposed document that is of concern.

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Page: 4, Para: 2.10

What is the proposed requirement or text?

The proposed text states:

The accessibility feature must be designed so that it can be stowed from the aisle side with 111 N (25 lbf) of force or less (regardless of power failure conditions, if applicable).

What about this proposed requirement do we want changed?

We recommend revising the text as follows:

The accessibility feature must be designed so that it can be stowed from the ~~aisle side~~ inside or outside with 111 N (25 lbf) of force or less (regardless of power failure conditions, if applicable).

Why is the change justified?

Better aligns with FAA Exemption 10879C for harmonization and provides more flexibility in design.

EASA response / Justification: Not accepted.
EASA does not agree to broaden item 10 from "aisle side" to "inside or outside". The intent is to ensure that the feature can be stowed by a person acting from the aisle side so that obstruction to the egress path can be removed promptly.

Comment No. 37 **by: Safran Seats**

Comment 1:

With respect to SC No. 5, it will be beneficial to properly define the conditions for "seated and belted passenger". This is to insure that no un-reasonable interpretation lead to un-realistic conditions.

suggest to add to SC 5) as follows:

"Either the primary or secondary retention mechanism controls must be positioned such that a seated and belted passenger will not be able to operate them. ***A "seated and belted passenger" is defined as an occupant making proper use of the seat in the upright TTL conditions. That is when the occupant is seated on the bottom cushion and the occupant's back's side touching the backrest cushion and the belt fit snuggly around the occupant's waist.***"

Comment 2:

With respect to SC No. 7, including the occupant of the specific mini suite equipped with the PRM feature would enhance safety of the installation:

suggest to add to SC 7) as follows:

"Instructions regarding the proper operation and configuration of the accessibility feature must be provided and must contain the information that:

a. […]

b. during an emergency evacuation, the accessibility feature shall not be deployed in a way that may prevent or obstruct the egress of ***the passenger occupying the seat and*** any other evacuating passenger."

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EASA response / Justification: Partially accepted.

EASA agrees that "seated and belted passenger" should be understood in a normal seated taxi, take-off and landing posture. However, EASA does not consider it necessary to include a detailed definition in the SC.

Regarding the proposed addition to item 7(b), EASA considers that the current wording is sufficient.

Comment No. 40 **by: Federal Aviation Administration**

FAA Comment: In technical specification (8) of Section 2, it is assumed, though not stated, that the EASA condition applies in the event the accessibility feature becomes jammed and blocks the egress path.

Recommend adding the following bolded text: "If the accessibility feature, when in use, deploys into the egress path available to the occupant of any seat, it must be shown that a 5th percentile female and a 95th percentile male will be able to reach the main aisle from that seat **in the event the accessibility feature becomes jammed**, or..."

EASA response / Justification: Accepted.

EASA agrees that jammed conditions are relevant to the intent of item 8. The wording has been revised as proposed by the commenter.

Comment No. 41 **by: Federal Aviation Administration**

FAA Comment: For technical specification (8) in Section 2, in lieu of showing a 5^{th} percentile female and a 95^{th} percentile male will be able to reach the main aisle, should the accessibility feature become jammed and blocks the egress path, an option is provided to allow the applicant to establish procedures to ensure the occupant is relocated. Though relocating the occupant may resolve the egress concerns during flight, it would not resolve the concern in an emergency landing scenario. To address the emergency landing scenario, dual means of egress should be offered to the occupant of the adjacent seat. This does not necessarily mean the occupant must have the ability to egress over the suite walls but should have some secondary means for reaching the main aisle.

Recommend removing the phrase "..., or procedures must be established to ensure that the occupant is relocated."

EASA response / Justification: Not accepted.
EASA acknowledges the concern regarding occupants relocation. However, EASA has retained this option in order to preserve flexibility for configurations where affected occupants can be managed safely in operation.

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Comment No. 42 **by: Federal Aviation Administration**

FAA Comment: Technical specification (8) should consider accessibility features which may jam and block the main aisle itself. Recommend including specifications that ensure the accessibility feature does not become jammed in a way that it blocks egress along the main aisle.

EASA response / Justification: Partially accepted.
EASA agrees that possible obstruction of the main aisle itself should be considered where relevant. The final text and its interpretation are reviewed to ensure that this safety objective is appropriately covered.

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