



## COMMENT RESPONSE DOCUMENT

**EASA CRD of Equivalent Safety Finding on CS 25.795(c)(3)(iii) : Security considerations  
Applicable to Airbus A350-941, with Skycoach™ installation  
[Published on 12 December 2016 and officially closed for comments on 13 January 2017]**

**Commenter 1: FAA – Victor Wicklund/ Manager, Transport Airplane Directorate Standards Staff / 16 December 2016**

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

- 1- The reason that the authorities adopted the 25.795(c)(3)(iii) requirement for tamper-evident life preserver stowage is because the searches of that area of the cabin were proving to be ineffective prior to adopting this standard. It is not clear that requiring such a search via airplane flight manual as proposed in the ESF will improve the situation as compared to the situation that existed before the standard in question went into effect.
- 2- In addition, we are concerned the EASA proposed ESF may give mixed signals to industry regarding acceptability of tamper-evident features.

### **EASA response: EASA agree**

*The ESF published by EASA was limited to a specific A350-900 cabin layout with 306 passenger seats in total, 36 (12 triple seats) of which had a design needing the provisions of the ESF (i.e. no non-compliance with 270 of the seats) . It is to be noted that the A350-900 is approved for passenger cabin layouts of up to 440 passenger seats. The proposed ESF was based on the consideration that the difficulty and the level of diligence required to properly perform a search of 270 such seats plus 36 seats needing a more involved inspection would be no more than that required for a “simple inspection or search” (ref. paragraph 5.d. of FAA AC 25.795-8) of 440 seats which have been found in compliance with CS 25.795(c)(3)(iii).*

*However, EASA has received adverse comments on the proposed ESF. Two commenters highlighted how the proposed ESF does not align with the guidance given in FAA AC 25.795-8, which is referenced in EASA AMC 25.795(c)(3). In fact, FAA AC 25.795-8 defines the intent of this regulation as follows:*

*“The intent of § 25.795(c)(3) is to make it easier to conduct a search, thereby increasing the probability of finding dangerous objects on the airplane.”*

*The reason that the Aviation Authorities, included EASA, adopted the 25.795(c)(3)(iii) requirement for tamper-evident life preserver stowage is because the searches of that area of the cabin were proving to be ineffective prior to adopting this standard. One commenter pointed out that It is not clear that requiring such a search via airplane flight manual as proposed in the ESF will improve the situation as compared to the situation that existed before the standard in question went into effect. In addition, it was pointed out that the proposed ESF may give mixed signals to industry regarding acceptability of tamper-evident features.*



***EASA has carefully evaluated the adverse comments received during the public consultation phase and has decided to accept the request of the commenters to withdraw the ESF.***

***Commenter 2: Boeing Commercial Airplanes – Capt. Terry L. McVenes/ Director, System Safety & Regulatory Affairs/ 19 December 2016***

***Comment # 1 : Applicant Safety Equivalency Demonstration***

With the limited information/background available in the proposed ESF, it does not align with the guidance in FAA AC 25.795-8 or discussions with the FAA. It appears that the basis of the ESF proposal requires a manual action to check for objects in the life preserver container and the life preserver package.

This is outside of the guidance we have received for finding compliance to the regulation. AC 25.795-8 defines the intent of this regulation as: “The intent of § 25.795(c)(3) is to make it easier to conduct a search, thereby increasing the probability of finding dangerous objects on the airplane.”

The proposed ESF for the Skycouch™ design does not utilize any mitigating design or installation features to ensure a simple inspection or to mitigate illicit tampering risk.

AC 25.795-8 guidance states that a simple inspection/search is; “A visual search in which no specialty tools or equipment is needed, and there are no sub-compartments.” There is no indication that the proposed mandatory AFM inspection details do not include an intrusive, “hands-on” rather than visual inspection or do not require specialty tools.

Recent guidance from the FAA indicates that it is not appropriate to include interior operational limitations in the AFM, since the intent of the AFM is to capture data to satisfy design compliance requirements relative to those items/issues under the direct control of the Flight Crew. On other aircraft deliveries/certifications, design features that required the inspector to manually manipulate or access the life vest compartment to support the inspection were found non-compliant by the FAA.

Comment :

*“The additional mandatory inspections of the life preservers themselves and the insides of the life preserver containers will ensure that no tampering of the life preservers has taken place and that no foreign or suspicious objects have been placed in any of the life preserver containers.” should be withdrawn*

***EASA response: EASA agree***

***Refer to the EASA reply provided for the Comment #1 / Commenter #1***

***Comment # 2 : Applicant Safety Equivalency Demonstration***

Comment :



To provide a clear consistent approach for all applicants, if this proposed ESF is approved, additional guidance / policy should developed, documented and harmonized, to the extent possible, with the FAA.

**EASA response: EASA agree**

**Refer to the EASA reply provided for the Comment #1 / Commenter #1**

Note 1: **If more than 6 comments are received, copy the (empty!) tables for #5 and #6 and paste these below, re-numbering these as #7 and #8, and so on, ad infinitum.**

Note 2: **When writing an EASA response, the responder should express first whether EASA agrees, partially agrees, or disagrees with the submitted comment /change proposal and should explain the grounds of the response. [e.g. “we disagree. Vibration trend monitoring is successful in detecting cracked HPT seals, /... / and is the most practical way to prevent an unsafe condition due to cracked HPT seals”, or “we agree. We have amended the Final AD accordingly”]. Unless EASA (partially) agrees with a comment, a statement should be added (for each comment) that ‘No changes have been made to the Final AD in response to this comment’.**

