



European Union Aviation Safety Agency
Comment-Response Document 2019-13

RELATED NPA: 2019-13— RMT.0508—8.10.2020

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1. Summary of the outcome of the consultation

A summary of the stakeholders' comments submitted to NPA 2019-13¹ is provided in the related Decision 2020/015/R.

In this CRD, the following points were also addressed:

- Some commenters requested to clarify the elements of the aircraft difference table that are used in the process for determining a new aircraft type of variant in the context of operational suitability date (OSD) certification for cabin crew. The comments were taken into account and the contents of the table were clarified accordingly.
- Other commenters requested further guidance on CS CS CCD.400 'Cabin aspects of special emphasis' (CASE). In response to the comments received, EASA developed the related GM1 CCD.400.

¹ <https://www.easa.europa.eu/sites/default/files/dfu/NPA%202019-13.pdf>



2. Individual comments and responses

In responding to the comments, the following terminology has been applied to attest EASA’s position:

- (a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — EASA either partially agrees with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the existing text is considered to be necessary.
- (d) **Not accepted** — The comment or proposed amendment is not agreed by EASA.

(General Comments)	-
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comment	1		comment by: <i>DGAC FR (Mireille Chabroux)</i>
		DGAC France has no comment on this NPA.	
response		EASA thanks you for your feedback.	

comment	2		comment by: <i>LBA</i>
		LBA has no comments	
response		EASA thanks you for your feedback.	

comment	3		comment by: <i>UK CAA</i>
		Thank you for the opportunity to comment on this NPA 2019-13. Please be advised that there are no comments from the UK CAA.	
response		EASA thanks you for your feedback.	



comment	33	comment by: <i>Austro Control</i>
	Dear all, Austria offers no comments to this NPA.	
response	EASA thanks you for your feedback.	

EXECUTIVE SUMMARY

p. 1-2

comment	4	comment by: <i>ATR</i>
	ATR thanks EASA for giving the opportunity to respond to the NPA 2019-13. The proposed amendments are agreed.	
response	EASA thanks you for your feedback.	

2. In summary — why and what

p. 4-5

comment	5	comment by: <i>Airbus-Regulations-SRg</i>
	<p>Airbus thanks EASA for offering to comment the NPA 2019-13.</p> <p>Over the past 5 years since initial issue of CS-CCD has been issued by the Agency, Airbus as Type Certificate Holder has experienced its use as part of the newly established Operational Suitability Data (OSD) certification process in the context of new or change to Type Certificate. A number of issues have been encountered, essentially related to different interpretations and/or lack of clarity of the requirements. Although solutions have generally been found resulting in successful approvals, taking into account the lessons learned of the past exercises in CS-CCD would certainly increase the efficiency of the OSD – Cabin Crew certification process.</p> <p>Considering the ongoing rulemaking task NPA 2019-13 on regular updates of CS-CCD, Airbus would therefore like to be associated with the EASA efforts in improving the current CS- CCD.</p> <p>Additional subjects have been identified with a potential for added value for CS-CCD update as per NPA 2019-13. Airbus considers that these subjects may not all be</p>	



response

considered as non-complex, non-controversial, and mature, hence our disagreement with the objective section of the NPA 2019-13.

Noted

Thank you for your comments received by email. This rulemaking task (RMT).0508 is included in the European Plan for Aviation Safety (EPAS) [2020-2024](#) under regular updates, which limits its scope. Those comments that fall within the scope of regular updates were addressed, whereas other proposed amendments may be considered for rulemaking under future RMTs in the next EPAS publications.

3. Proposed amendments and rationale in detail — 3.1. Draft Certification Specifications (draft EASA decision amending CS-CCD) — Appendix 1 to CS CCD.200(b)(1)

p. 6-7

comment

6

comment by: Airbus-Regulations-SRG

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

Appendix 1 to CS CCD.200(b)(1) and CS CCD.205(b)(4) “Any design-related element new to the respective type or variant that could impact normal and/or emergency operations and that would require additional knowledge, new roles and/or tasks for the cabin crew”

2. PROPOSED TEXT:

Proposed text: “Any design-related element new to the respective type or variant that could impact normal and/or emergency **operating procedures** and that would require additional knowledge, new roles and/or tasks for the cabin crew”

Airbus suggests also to review all the CS CCD requirements to update ‘operations’ by ‘operating procedures (such as CS CCD.205(a)(4), GM1 CDD.205(b)(4), etc)

3. RATIONALE: ‘Operations’ are used to describe procedures and physical operations. Both definitions need to be clarified, the CS CCD needs to be consistent with these definitions.

Airbus suggests also to update CS CCD.105 Definitions section as follows:

“Operation: (in reference to system operation) is a sequence of technical steps defined by the design of a system or equipment in order to achieve the desired result whilst complying with manufacturer recommendations.

As an example, the operation of a door in the normal mode consists of 2 actions:

- ensure the slide arming lever is in the disarmed position,
- lift the door handle.

Operating Procedure or Procedure: (in reference to normal/emergency operating procedure) is a series of chronological step-by-step instructions in order to comply with



industry regulations in a safe and efficient way. Instructions may consist in system operation, situation evaluation, technical check, coordination....

As an example, the SOP to open the door in the normal mode may include:

- the operation of the door in normal mode,
- coordination amongst crew members,
- situation assessment (out side condition)”

response

Partially accepted

Thank you for your contribution. We have considered your proposal to clarify the use of ‘operation’ and ‘procedures’: we aligned CS-CCD with the related cabin crew requirements of Annex III (Part-ORO) to Regulation (EU) No 965/2012 (‘the Air OPS Regulation’) by using ‘normal and emergency procedures’.

Consequently, the proposal to include individual definitions for ‘operations procedures’ and ‘operating procedures’ was not accepted as those are already defined in Part-ORO.

comment 7 comment by: Airbus-Regulations-SRg

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

Appendix 1 to CS CCD.200(b)(1) and CS CCD.205(b)(4) “Any design-related element new to the respective type or variant that could impact normal and/or emergency operations and that would require additional knowledge, new roles and/or tasks for the cabin crew”

2. PROPOSED TEXT:

Associated to this update, the GM1 CCD.205(b)(4) would also need to be updated in order to add “that would require additional knowledge, new roles and/or tasks for the cabin crew”

GM1 CCD.205(b)(4) should be enhanced with a changed text as follows:

“Design-related element that would require additional knowledge, new roles and/or tasks by cabin crew in:

- Normal operation, such as critical flight phases
- Emergency operations, such as fire fighting, emergency evacuation, ditching, decompression”

3. RATIONALE:

Associated to this update, the GM1 CCD.205(b)(4) would also need to be enhanced to help the interpretation of this element.

response

Accepted



A new guidance material (GM) on the determination elements of normal and emergency procedures was developed, including examples to support the application of those procedures.

comment

11

comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST:

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

CS CCD.215(a) “The candidate aircraft that has not been determined as a new type is determined as variant of the base aircraft.”

2. PROPOSED TEXT:

A change to Type Design may require additional knowledge for cabin crew but not conclude in the need of a new variant.

In this context, Airbus proposes to change the text of CS CCD.215(a) as follows: “The determination of whether a certain aircraft is a variant may be made at the request of the applicant”.

3. RATIONALE:

CS CCD.210 gives criteria that lead to the determination of a new type. CS CCD.215 tells that an aircraft that has not been determined as a new type is a variant. However past certification exercises lead to the conclusion that a candidate aircraft was the same aircraft as the base aircraft even if differences in aircraft systems (CS CCD.205 (b)(3)) may exist between both.

Consequently, criteria to determine if an aircraft is a variant should be proposed in CS-CCD based on the purpose of the establishment of variant within an aircraft type for cabin crew. A starting point for such criteria could be differences in number or type of exit with same operation, as identified when comparing A320 and A321; also the installation of self-help exit could lead to establishing a variant.

The method to determine a new aircraft type or variant differs between CS CCD.215 and Air Operations regulation (ORO.CC.250). These methods should be aligned.

response

Accepted

CS CCD.215 is updated to revise the criteria used to determine a variant. Consistency with the approach to determining a new type is also ensured, as well as reference to the ‘same variant’ outcome is made.



comment 12

comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

CS CCD.210 Determination of a new type

[...]

(c) The following need not be a factor in determining the candidate aircraft as a new type unless as specified in (d):

(1) one additional pair of doors/exits of the same type and operation as any type installed on the base aircraft; or

(2) [...]

(3) self-help exit types as defined by CS-25.

2. PROPOSED TEXT:

Airbus proposes an update as follows: CS CCD.210 Determination of a new type

“(c) The following need not be a factor in determining the candidate aircraft as a new type unless as specified in (d):

(1) ~~one additional pair of one or several~~ doors/exits of the same ~~type and~~ operation as any ~~type doors/exits~~ installed on the base aircraft ~~are added or removed~~; or

(2) [...]

(3) self-help exit types ~~as defined by CS-25~~ - intended to be operated by passengers

3. RATIONALE:

The Air Operations (ORO.CC.250) identifies only the operation of the emergency exit as a criteria to conclude of a new type. Number, location and **type** are not criteria to determine an aircraft as a new type. Consequently, Airbus suggests that the methodology for type determination of the CS CCD should be aligned with the Air Operations.

Past evaluations concluded that the installation of different door types as defined in CS 25.807 did not lead to a new aircraft type (e.g. A330 can have type A or type I at door 3; A350 can have type A, C or A+ at various doors). Differences in numbers and locations did not lead to a new type but to a variant provided door operation is the same (e.g. A321 has 4 type C doors compared to A320 with 2 type C doors). Whereas in these case, the current CS CCD method would have concluded to a new type. Consequently, Airbus suggests to review CS CCD.210(c)(1) and proposes to add (4).

In addition, self-help exit types is not defined in CS-25 and should be explained in the CS CCD. Airbus suggests that self-help exits are the one intended to be operated by passengers.

Generally, in CS CCD.210, several conditions related to the exit type (such as CS CCD.210(c)(2), (c)(3) and (e)) are equivalent as excluding the exit type from criteria that



response

leads to aircraft type determination. Same result could be achieved if the exit type would not be identified as a criteria in CS CCD.210. This could be an alternative for the review of CS CCD.210, bringing simplifications.

Comment (1): accepted.

Comment (2) on point (3) of CS CCD.210: accepted.

EASA clarified 'self-help exits' in CS CCD.210 in line with SUBPART CC 'CABIN CREW' of Part-ORO of the Air OPS Regulation.

comment

13

comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

GM2 and GM3 to Appendix 1 to CS CCD.200(b)(1) Aircraft difference table

2. PROPOSED TEXT:

Airbus proposes to insert "... it **may imply** ..." as follows:

GM2 to Appendix 1 to CS CCD.200(b)(1)

"IMPACT ASSESSMENT (a)

Part 'Impact assessment (a)' [...]

1. Column 'Impact on description of the element' [...]

2. Column 'Impact on operation of the element' [...] The column implies knowledge and **it may imply** hands-on training requirement."

GM3 to Appendix 1 to CS CCD.200(b)(1)

IMPACT ASSESSMENT (b)

Part 'Impact assessment (b)' [...]

1. Column 'Potential impact on procedures' [...]

2. Column 'Combined impact on operation of the element and potentially on procedures' [...]

~~Identification implies knowledge requirement attained by aided instruction and **it may imply** hands-on training"~~

3. RATIONALE:

This GM should be reviewed, especially the consequence on training method of the impact assessment on operation of the element. Such an impact does not necessarily implies hands-on training, as it has been identified when comparing the A350 to the A330.

response	<p>Depending on the aircraft systems that is different, aided instruction may be sufficient.</p> <p>Partially accepted</p> <p>A minor modification was made to the proposed amendment: both (a) and (b) use the same wording.</p>
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comment	<p>16 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO: Appendix 1 to CS CCD.200(b)(1) Doors and Exits / Assisting evacuation means section “Emergency signaling system [...] activation on land/in water”</p> <p>2. PROPOSED TEXT: Add “fixed” to read as follows: “Fixed Emergency signaling system [...] activation on land/in water”</p> <p>3. RATIONALE: To clarify the scope of this determining element</p>
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response	<p>Not accepted</p> <p>Thank you for your contribution. The intent of the existing text of Appendix 1 to CS CCD.200(b)(1) ‘Aircraft difference table’ under DOORS AND EXITS, Means assisting evacuation, Emergency signalling system [...] is to address the emergency locator transmitter (ELT) that is ‘attached’ to the raft, as opposed to the ELT that is ‘fixed’ in the aircraft. The latter is incorporated in the fuselage and is controlled (AUTO/MANUAL) from the cockpit. The fixed ELT is addressed in Appendix 1 to CS CCD.310 under Aircraft systems including associated equipment, (n) other systems.</p>
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comment	<p>17 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO: Appendix 1 to CS CCD.200(b)(1) Aircraft difference table Determination elements, Aircraft Systems</p>
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	<p>“(c) smoke detection system: Function [...]”</p> <p>2. PROPOSED TEXT: Add “...and Panels” to read as follows</p> <p>“(c) smoke detection system: Function and Panels. [...]</p> <p>3. RATIONALE: To be consistent with the rest of the appendix’ content</p>
response	Accepted

comment	<p>18 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO: Appendix 1 to CS CCD.200(b)(1) Aircraft difference table Determination elements, Aircraft Systems (f) communication system: [...] Possibility of interphone calls in normal and emergency circumstances between cabin and flight crew compartment. [...]</p> <p>2. PROPOSED TEXT: New proposed text: (f) communication system: [...] Possibility of interphone calls in normal and emergency circumstances between the different cabin compartments and between the cabin and flight crew compartments. [...]</p> <p>3. RATIONALE:</p>
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response	To be more concise
	Accepted

comment	31	comment by: <i>The Boeing Company</i>						
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%; text-align: center;"><i>Non-Concur</i></th> <th style="width: 33%; text-align: center;"><i>Substantive</i></th> <th style="width: 33%; text-align: center;"><i>Editorial</i></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> </tbody> </table>			<i>Non-Concur</i>	<i>Substantive</i>	<i>Editorial</i>	X		
<i>Non-Concur</i>	<i>Substantive</i>	<i>Editorial</i>						
X								
<p>Page: 6</p> <p>Paragraph: <i>Appendix 1 to CS.CCD.200(b)(1) Aircraft Difference Table</i></p>								
<p><u>THE PROPOSED TEXT STATES:</u></p> <p><i>“Any design-related element new to the respective type or variant that could impact normal and/or emergency operations and that would require additional knowledge, new roles and/or tasks for the cabin crew”</i></p> <p><u>REQUESTED CHANGE:</u> We request EASA to leave the existing text as is, and discard the proposed changes in the NPA.</p> <p>The existing text (released in Jan 31, 2014, Initial Issue) states:</p> <p><i>“...Design-related element(s) impacting on either normal operations or on emergency operations or on both normal and emergency operations relevant to aircraft type...”</i></p>								
<p><u>JUSTIFICATION:</u> The text that EASA proposed to change as part of the NPA indicates that an impact assessment would be needed for differences, <i>“...require(ing) additional knowledge, new roles and/or tasks for the cabin crew...”</i></p> <p>We believe the text changes proposed in the NPA do not provide clarity and in fact are more ambiguous than the existing text. There is ambiguity of what <i>additional knowledge</i> means and what parameters a change would require <i>new roles or tasks</i> and for those reasons we request EASA to not change the existing text or provide more clarity related those terms.</p> <p>Typically, OEM do not assess an airline <i>‘roles’, ‘tasks’,</i> or procedures. OEM assumes certain tasks and procedures as part of the design process. However, that responsibility is left to individual airlines to decide and get approval by the respective regulator, POI, etc.</p> <p>The words specifying that any differences or changes needing <i>“additional knowledge”</i> appears to mandate the OEMs to make specific determinations that are more appropriate for an airline (and their regulator/POI) to determine.</p>								



response

Not accepted

Thank you for your contribution. CS-CCD addresses initial airworthiness as well as changes thereto. There may be type design changes that have no impact on cabin crew performance, and therefore on the CCD, for the purpose of type certification. Several original equipment manufacturers (OEMs) requested this clarification. OEMs are required to provide data on all type design elements that impact on cabin crew (CC) performance to support operators in developing their customised CC training for aircraft types and variants. OEMs are not required to assess the cabin crew level of proficiency of operation on aircraft types and variants. That assessment remains the responsibility of operators.

3. Proposed amendments and rationale in detail — 3.1. Draft Certification Specifications (draft EASA decision amending CS-CCD) — CS CCD.205 Determination elements

p. 7

comment

8

comment by: *Airbus-Regulations-SRg*

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

GM1 CS CCD.205(b)(2)(i)

‘Types of doors and exits should be understood as the ‘types’ defined in CS 25.807 ‘Emergency exits’. All other criteria listed in CS CCD.205(b)(2) must be considered when assessing doors and exits for the purpose of compliance with CS-CCD.

2. COMMENT:

Airbus suggests to add the Doors and Exits definition to the “CS CCD.105 Definitions” section

3. RATIONALE:

For a clearer understanding when defining training material related to Doors and Exits.

response

Not accepted

Thank you for your contribution. The proposal is no longer applicable as ‘types’ of doors and exits was deleted.

comment

32

comment by: *The Boeing Company*



Non-Concur X	Substantive	Editorial
<p>Page: 7</p> <p>Paragraph: CS.CCD.205 Determination Elements</p>		
<p>THE PROPOSED TEXT STATES:</p> <p><i>“(b) When identifying differences of the elements specified in (a), the applicant assesses the following:</i></p> <p><i>(4) Any design-related element new to the respective type or variant that would impact normal and/or emergency operations and that would require additional knowledge, new roles and/or tasks for the cabin crew.”</i></p> <p>REQUESTED CHANGE: We request EASA to leave the existing text as is, and discard the proposed changes in the NPA.</p> <p>The existing text (released in Jan 31, 2014, Initial Issue) states:</p> <p><i>“(b) When identifying differences of the elements specified in (a), the applicant assesses the following:</i></p> <p><i>(4) In normal and emergency operations, any design-related element that would impact normal or emergency operations or on both normal and emergency operations.”</i></p>		
<p>JUSTIFICATION: The text that EASA proposed to change as part of the NPA indicates that an impact assessment would be needed for differences, <i>“...require(ing) additional knowledge, new roles and/or tasks for the cabin crew...”</i></p> <p>We believe the text changes proposed in the NPA do not provide clarity and in fact are more ambiguous than the existing text. There is ambiguity of what <i>additional knowledge</i> means and what parameters a change would require <i>new roles or tasks</i> and for those reasons we request EASA to not change the existing text or provide more clarity related those terms.</p> <p>Typically, OEM do not assess an airline <i>‘roles’, ‘tasks’,</i> or procedures. OEM assumes certain tasks and procedures as part of the design process. However, that responsibility is left to individual airlines to decide and get approval by the respective regulator, POI, etc.</p> <p>The words specifying that any differences or changes needing <i>“additional knowledge”</i> appears to mandate the OEMs to make specific determinations that are more appropriate for an airline (and their regulator/POI) to determine.</p>		



response

Not accepted
See response to comment No 31 above.

3. Proposed amendments and rationale in detail — 3.1. Draft Certification Specifications (draft EASA decision amending CS-CCD) — CS CCD.215 Determination of a variant

p. 8

comment

9

comment by: Airbus-Regulations-SRg

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

CS CCD.215(a) “The candidate aircraft that has not been determined as a new type is determined as variant of the base aircraft.”

2. PROPOSED TEXT:

Airbus proposes an update as follows:: CS CCD.215(a) “The candidate aircraft that has not been determined as a new type is determined as a variant of the base aircraft.”

3. RATIONALE:

Typo correction

response

Accepted

comment

10

comment by: Airbus-Regulations-SRg

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

CS CCD.215(a)

The candidate aircraft that has not been determined as a new type is determined as a variant of the base aircraft.

2. PROPOSED TEXT:

Airbus suggests to update the Variants definition in CS CCD.105 Definitions section as follows:

“(i) Variant means an aircraft of the same type that has differences to the base aircraft requiring completion of differences training”



response	<p>3. RATIONALE:</p> <p>To enable a more transparent understanding of aircraft types and variants of an aircraft which can affect the license.</p>
	<p>Accepted</p>

3. Proposed amendments and rationale in detail — 3.1. Draft Certification Specifications (draft EASA decision amending CS-CCD) — Appendix 1 to CS CCD.310 Type-specific data content p. 8

comment	<p>15 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:</p> <p>Appendix 1 to CS CCD.310 Type Specific Data content</p> <p>2. COMMENT:</p> <p>Delete all elements belonging to the operator’s conversion training programme from Appendix 1 to CS CCD.310.</p> <p>3. RATIONALE:</p> <p>CS CCD.310 requires the aircraft manufacturer to develop data to support the development of type specific training programme. However the Appendix 1 to CS CCD.310 requires elements for operator conversion training programme (lavatory, crew rest compartment, galley, etc.).</p> <p>Airbus suggests removing the elements belonging to the operator conversion training programme as defined in AMC1 ORO.CC.125(d).</p>
response	<p>Not accepted</p> <p>Thank you for your contribution. EASA understands that when crew rest compartments, galleys, lavatories, etc. are installed, the installer retains the responsibility to provide data.</p>

comment	<p>19 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:</p>
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	<p>Appendix 1 to CS CCD.310 Type Specific Data</p> <p>Aircraft description</p> <p>General</p> <p>[...]</p> <p>(b) range of operation and maximum operating altitude;</p> <p>(c) principal dimensions (length; height; width; wing span);</p> <p>(d) main characteristics (engines; landing gear; fuel tanks; flight controls; speed; maximum take-off weight);</p> <p>[...]</p> <p>2. PROPOSED TEXT & COMMENT:</p> <p>Airbus suggests to remove subsections (b), (c):</p> <p>(b) range of operation and maximum operating altitude;</p> <p>(c) principal dimensions (length; height; width; wing span);</p> <p>And Airbus suggests to update subsection (d): Delete "... maximum take-off weight." To read as follows:</p> <p>"(d) main characteristics (engines; landing gear; fuel tanks; flight controls; speed; maximum take-off weight);"</p> <p>3. RATIONALE:</p> <p>Airbus considers that such elements are not needed for cabin crew training to ensure safe operations.</p>
response	<p>Partially accepted</p> <p>The main characteristics of the aircraft general description was reviewed to remove the 'maximum take-off weight'. However, the other main characteristics remain, to ensure consistency with AMC1 ORO.CC.125(c) on training programmes, aircraft type-specific training, and contents.</p>

comment	<p>20 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:</p> <p>Appendix 1 to CS CCD.310 Type Specific Data</p> <p>Aircraft description</p> <p>General</p>
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	<p>[...]</p> <p>(h) entrances and emergency exits (entrance and service doors; emergency exits; flight crew compartment window; flight crew compartment emergency hatch; avionics compartment);</p> <p>[...]</p> <p>2. PROPOSED TEXT: Airbus suggests that “entrances” is replaced by “doors” to read as follows:</p> <p>(h) doors and emergency exits (entrance and service doors; emergency exits; flight crew com-partment window; flight crew compartment emergency hatch; avionics compartment);</p> <p>3. RATIONALE:</p> <p>For harmonization. Air Operations use always the term “doors”.</p>
response	Accepted

comment	<p>21 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:</p> <p>Appendix 1 to CS CCD.310 Type Specific Data</p> <p>Flight Crew Compartment</p> <p>(f) avionics compartment (location; purpose; operation of avionics access hatch; access from inside/outside).</p> <p>2. PROPOSED TEXT:</p> <p>Airbus suggests to update this topic as follow:</p> <p>Flight Crew Compartment</p> <p>(f) “avionics compartment if certified as an evacuation route (location; purpose; operation of avionics access hatch; access from inside/outside).”</p> <p>3. RATIONALE:</p> <p>In accordance with Air Ops AMC1 ORO.CC.125(c) “access to avionics bay where relevant”.</p> <p>Airbus considers that providing information on the avionics bay is relevant for cabin crew training only if the avionics bay is a way to evacuate the aircraft.</p> <p>CCOM is not a secured document, to avoid hackers to have more information on flight crew compartment.</p>
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response Accepted

comment 22 comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:
 Appendix 1 to CS CCD.310 Type Specific Data
 Cabin compartment
 (b) doors and exits - entrance/service doors/emergency exits:
 [...]
 (4) operation from outside;
 [...]

2. PROPOSED TEXT:
 Airbus suggests to update “Cabin compartment”, subsection (b) (4) to add “only required for doors” to read as follows:
 (4) operation from outside **only required for doors**

3. RATIONALE:
 Not relevant for self-help exits.

response Not accepted.

Thank you for your contribution. CS-CCD addresses a wide range of products. Certain products, for example, to be operated from the outside of service doors, allow/require CC training. Where the CS-CCD content is not applicable to certain products, the OEM may indicate ‘N/a’ as justification for the absence of data.

comment 23 comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:
 Appendix 1 to CS CCD.310 Type Specific Data
 Cabin compartment
 [...]



	<p>(c) escape slide/slide raft/ramp slide/life raft: [...]</p> <p>(2) type and number of units (single/multi lane; single/multi buoyancy chamber/length and width); [...]</p> <p>2. PROPOSED TEXT: Airbus suggests to update “Cabin compartment”, subsection (c) (2) as follows: (2) type and number of units (single/multi lane; single/multi buoyancy chamber/length and width (if available));”</p> <p>Thank you for your comment, however the comment is rejected. The information should be made available to the installer by the slide/life-raft manufacturer, or reference to the manufacturer’s documentation where the data is available should be included in CCD.</p> <p>3. RATIONALE: There is no impact on operation.</p>
response	<p>Not accepted</p> <p>See response to comment No 22 above.</p>

comment	<p>24 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO: Appendix 1 to CS CCD.310 Type Specific Data Cabin compartment [...]</p> <p>(c) escape slide/slide raft/ramp slide/life raft: [...]</p> <p>(10) limitation/operation of inverted slide/life raft; [...]</p> <p>2. PROPOSED TEXT: Airbus suggests to update “Cabin compartment”, subsection (c) (10) to read as follows: (10) limitation/operation of inverted slide/life raft after ditching;</p> <p>3. RATIONALE:</p>
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response

If the slide-raft is inverted for ground evacuation versus ditching, the operation is not the same.

Not accepted

Thank you for your contribution. Both inflatable slides and inflatable life rafts may be inverted, but they can coexist on the same aircraft.

comment 25 comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

Appendix 1 to CS CCD.310 Type Specific Data

Cabin compartment

[...]

(h) galley - description of galley systems.

2. PROPOSED TEXT:

Airbus suggests to update “Cabin compartment” section (h) to read as follows:

(h) galley - description of galley systems **where linked to the safe operation and emergency procedure”**

3. RATIONALE:

This topic concerns also normal procedure, like securing trolley for critical phases.

response

Not accepted

Thank you for your contribution. All galley systems are linked to safe operation and emergency procedures (e.g. the electrical system, water drain system, drop-down oxygen system, etc.).

comment 26 comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

Appendix 1 to CS CCD.310 Type Specific Data

Aircraft systems including associated equipment



response	<p>[...]</p> <p>(c) smoke detection system:</p> <p>(1) location and function (passenger cabin/lavatory/crew rest compartment(s)/cargo compartment);</p> <p>[...]</p> <p>2. PROPOSED TEXT:</p> <p>Airbus suggests to update “Aircraft systems including associated equipment” subsection (c) (1) to read as follows:</p> <p>(1) location and function (passenger cabin/lavatory/crew rest compartment(s)/cargo compartment-when cabin crew actions are needed);”</p> <p>3. RATIONALE:</p> <p>There is no cabin crew interaction with the smoke detection system of the cargo compartment.</p>
comment	<p>27 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:</p> <p>Appendix 1 to CS CCD.310 Type Specific Data</p> <p>Aircraft systems including associated equipment</p> <p>[...]</p> <p>(f) electrical system:</p> <p>(3) door electrical warning system (cabin pressure/slide armed/safeguard sensor);</p> <p>[...]</p> <p>2. COMMENT:</p> <p>Airbus suggests to move this topic to “Cabin compartment” section (b) (doors and exits description)</p> <p>3. RATIONALE / REASON for comment:</p> <p>To concentrate subjects related to doors at one place.</p>

response

Noted

Depending on the criteria used, the requirement can remain unchanged, or be moved as suggested if 'electrical systems' is no longer the criterion, but 'doors and exits'.

comment

28

comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

Appendix 1 to CS CCD.310 Type Specific Data

Aircraft systems including associated equipment

[...]

(n) other systems – installed emergency locator transmitter.

2. PROPOSED TEXT:

Airbus suggests to update "Aircraft systems including associated equipment", section (n) to read as follows:

(n) other systems – ~~installed~~ fixed emergency locator transmitter.

3. RATIONALE:

To be consistent with comment on ADT table

response

Accepted

3. Proposed amendments and rationale in detail — 3.1. Draft Certification Specifications (draft EASA decision amending CS-CCD) — CS CCD.400 Cabin aspects of special emphasis p. 8

comment

14

comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

CS CCD.400 Cabin Aspect of Special Emphasis

2. COMMENT:



	<p>Airbus proposes to add a GM to this CS CCD.400 requirement.</p> <p>3. RATIONALE:</p> <p>The definition of CASE should be reviewed to clarify the scope, objective and intended use of CASE. Additional guidance (GM) or a dedicated process may be added for the determination of CASE. It should be clarified that CASE pertains to item specific to a given aircraft type, variant or aircraft modification that must be trained in order to prevent knowledge misunderstanding or skill errors having a potential impact on safety. The following criteria could be considered as trigger for the creation of CASE:</p> <ul style="list-style-type: none"> - A novel and unique design or operational characteristic is applicable to an aircraft type, variant or modification (or a group of aircraft types), and - Specific knowledge and skills are required for the safe operation of this novel and unique design or operational characteristic.
response	<p>Accepted</p> <p>A new GM on cabin aspects of special emphasis (CASE) was added.</p>

	<p>29 comment by: Airbus-Regulations-SRg</p> <p>ADDITIONAL CHANGE REQUEST</p> <p>1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:</p> <p>CS CCD.400 Cabin aspect of special emphasis</p> <p>(a) information identified during emergency evacuation demonstration required by CS 25.803, such as:</p> <p>[...]</p> <p>(4) general crowd control,</p> <p>[...]</p> <p>2. PROPOSED TEXT:</p> <p>Airbus suggests to update CS CCD.400(a)(4) to read as follows:</p> <p>(4) general specificities of crowd control”</p> <p>3. RATIONALE:</p> <p>The general crowd control is already part of the general safety training for Cabin Aspect of Special Emphasis (CASE) focuses on specificities</p>
response	<p>Accepted</p>



comment

30

comment by: Airbus-Regulations-SRg

ADDITIONAL CHANGE REQUEST

1. PARAGRAPH / SECTION OUR COMMENT IS RELATED TO:

CS CCD.400 Cabin aspect of special emphasis

[...]

(b) other unique elements identified during the certification process, e.g. direct view, trolley lift barrier, external viewing means, remote cabin areas, etc.

2. PROPOSED TEXT:

Airbus suggests to update this CS CCD.400(b) to read as follows:

(b) other unique elements identified during the certification process that may impact operating procedures, e.g. direct view, trolley lift barrier, external viewing means, remote cabin areas, etc.

3. RATIONALE:

To define the rationale of the Cabin Aspect of Special Emphasis (CASE)

response

Accepted

