

DISPOSITION OF PUBLIC COMMENTS

AC NO. 25.785-1B

TITLE: FLIGHT ATTENDANT SEAT AND TORSO RESTRAINT SYSTEM INSTALLATIONS

Comment	Requested Change	Disposition
Commenter: Airbus		
Limit exit viewing to required floor level exits only. An oversized exit should not be “penalized.”	None	The intent of direct view is to make the flight attendant aware of issues in the cabin; thus whether the exit is required or not is not relevant.
Permit head movement of 8.5” and 50/80%.	None	The revised criteria includes this allowance.
Commenter: ATA		
Permit head movement up to 16”.	None	If the restraint system permits, this would be acceptable.
Commenter: Boeing		
The guidance on direct view is “rulemaking” and should go through the rulemaking process.	None	The criteria may be seen as permissive, in that less than the entire cabin can be in view and be acceptable. The process of developing the criteria was a public process (ARAC) and has had legal review.
The AC criteria could possible be applied to new types only as recommended by the HWG.	None	The application of the criteria is beyond the scope of the AC. The rule converted by these criteria has been in effect since 1981. Applicants will still have to demonstrate compliance with the rule as required by their certification basis.
A cost/benefit analysis should be performed on this AC.	None	The criteria are within the scope of the rule, which has already had a cost/benefit analysis performed.

Comment	Requested Change	Disposition
Commenter: Boeing		
Head movement should be allowed. Percentages are prescriptive and should rather be performance based.	None	The revised criteria include consideration of head movement and are more performance based and less prescriptive.
Commenter: CAA-UK		
Clarification on “area responsible,” is needed; preferably by rule.	None	The area of responsibility is an operational determination. By defining area to establish sufficient direct view, area of responsibility can be determined in service. Rule changes are unlikely.
Specify how direct view requirements are communicated to the operator, e.g., placard, etc.	None	The AC recommends that information should be provided to the operator, but allows flexibility on how it is done.
Direct view seats might not have interphones, etc., and they should, if required to be occupied.	None	The regulations have multiple requirements for flight attendant seats, all of which have to be met. If the seats required for direct view do not satisfy the requirements adequately, they would not be acceptable.
Commenter: Various		
Comments not related to direct view	None	The AC revision was focused on the ARAC recommendations, which only covered direct view. Other revisions were proposed for public comment, but subsequent changes would not have had comment.