DOCUMENT COMMENT LOG

Originating Office: AIR-120 POC: Bob Warren	Document Description: AC for flammability testing of aircraft cabin interior panels after alterations	Reviewer: Public Comments Received	Reviewing Office: AIR-120	Date of Review: Dispositioned 4/27/2012

Company & Group	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
Skandia, Inc. FAA Flammability Test Lab	Page 6 Table 2	Where can we find composite panels that will produce these types of burn lengths when tested to 60 second vertical?	When this AC was proposed back in 2006, the issue was finding composite panels that gave the kind of results as shown in Table 2.	This is a great idea, but we as a test lab have not seen composite substrate materials that give such variations as shown in Table 2, for burn lengths. Composite substrate materials generally either pass with real short burn lengths or fail. Is there something out there that we haven't seen.	We can appreciate that an applicant can't go to their favorite interior panel store and ask for a panel with a 4.5" 60 second vertical burn. However, we have developed this methodology to accommodate a spectrum of different burn lengths so it would have the broadest appeal and still meet the vertical burn requirements with a margin that we are comfortable with. We offer this AC for the situations where it can apply.
Skandia, Inc. FAA Flammability Test Lab	Page 6 Table 2	In review of our test data and some composite panel I just tested yesterday, where composite panels tend to fail on after flame time vs. burn length.	What was explained to me by the panel manufacturer is that when making a composite press panel that some of the chemicals from the outer skin and adhesives get trapped in the honeycomb core which leads		We agree that after-flame time is the more problematic of the pass/fail requirements, and subject to more variability than burn length. However, a premise of this proposal is that the original panel

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			to after flame failure.		passed all the certification requirements. Thus, the variability of the after-flame time is inherently addressed since, irrespective of what the actual after-flame times are, the surrogate panel must meet the requirements.
GAMA	Page 1, paragraph 2(a)	GAMA suggests the FAA remove the word "never" and proposes the statement be reworded to state: "for which no approved flammability substantiation for this composite build up is available"			Adopted, revised sentence to read "This term is used to mean the layer or layers of material that are new and for which no approved flammability substantiation for this composite build up is available."
GAMA	Page 1, paragraph 2(c)	"Material. This term is used to mean the configuration representative of the final material build-up that will be installed in the aircraft."	GAMA has concern with using the term "material" in the definition of "Material" is indicative of the potential confusion with this term. GAMA proposes the FAA replace "material" with Composite Buildup". Using composite buildup more accurately communicates multiple materials assembled together. GAMA also		Adopted, replaced "Material" with "Composite Buildup". Edited references to material or materials in this document, where appropriate.

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			suggests the FAA update the remainder of the AC with similar substitutions.		
Embraer	Page 3, paragraph 6(c)	The proposal of using surrogate panels for 60-second vertical burn length flammability testing, instead of the original panel, with the new finish according to criteria of Table 2 is reasonable and may present benefits for the operators of old aircraft.	However, Embraer also suggests considering "self-extinguish time" and "dripping time" as criteria for determining compliance of repairs and alterations of aircraft interiors. Surrogate panels should not only exhibit greater "burn length", but also greater "self-extinguish time" and "dripping time".	Therefore, considering other criteria we would avoid the non-conservative use of surrogate panels that present greater "burn length" yet a smaller "self-extinguish or dripping time" when compared to the original panel. This flammability test result is not expected, but may eventually occur.	We agree that after-flame time is the more problematic of the pass/fail requirements, and subject to more variability than burn length. However, a premise of this proposal is that the original panel passed all the certification requirements. Thus, the variability of the after-flame time is inherently addressed since, irrespective of what the actual after-flame times are, the surrogate panel must meet the requirements.
Embraer	Page 4, paragraph 6(f)	Regarding the mention in this AC about the judgment of whether the original panels can be purchased for a fair price, Embraer suggests removing this sentence		Alternatively, **FAA** should provide clear guidance on how to calculate "fair price".	Not adopted, we have linked "reasonable effort" with "fair cost". If the applicant provides the ACO with some pricing info this would help substantiate the fairness of

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		because it is not clear how the determination of "fair price" is to be made.			the cost.
GAMA	Page 4, paragraph 6(f)	GAMA requests the FAA add additional language to define who determines when a reasonable effort has been made.			Not adopted, we have linked "reasonable effort" with "fair cost". If the applicant provides the ACO with some pricing info this would help substantiate the fairness of the cost.
GAMA	Page 4, paragraph 6(g)	"for STC projects, questions regarding whether or not the surrogate panel is representative of the actual panels will be determined by the geographic aircraft certification office (ACO) for domestic projects." For ODA STC projects, ODA should be authorized to make this determination. This is similar to allowing			This being a new AC, the geographic ACO will make the determination of surrogate panel suitability for STC projects. Based on our experience with DERs & ODAs approving flammability test data for major repairs & major alterations, we could consider revising this at a future date.

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		ODAs to make the determination for major repairs and major alteration type programs. Therefore, GAMA proposes the FAA add a statement that indicates: "for STC projects delegated to an ODA, the ODA will make the determination whether or not he surrogate panel is representative of the actual panel."			
GAMA	Page 8, paragraph A6	GAMA requests the FAA add "For ODA STC or major repair or major alteration projects, if the ODA Program Administrator or Unit Member question, the OMT will make the determination whether or not the surrogate panel is representative of the actual panel."			This being a new AC, the geographic ACO will make the determination of surrogate panel suitability for STC projects. Based on our experience with DERs & ODAs approving flammability test data for major repairs & major alterations, we could consider revising this at a future date.