

DISPOSITION OF FAA COMMENTS

AC 25.562-1B Change 1, *Dynamic Evaluation of Seat Restraint Systems and Occupant Protection on Transport Airplanes*

Prepared by [John Sheldon](#), ANM-115

No.	Comment	Requested Change	Disposition
Commenter: Timothy W. Weaver, AFS-330			
1.	Within AC 25-17A, “AC 25.562-1B” is referenced six times with a date at the end of the reference: pages 4, 5, 8, 108, 136, and 783.	I suggest removing the date at the end of the reference to AC 25.562-1B within AC 25-17A.	We agree but have not revised the proposed AC. The comment proposes a change to AC 25-17A, but we are proposing to revise AC 25.562-1B in this action. We plan on issuing a revision to AC 25-17A in the future and will update all references in that AC at that time.

No.	Comment	Requested Change	Disposition
Commenter: Richard Beckwith, ANE-171			
1.	<p>The note that is proposed to be added under paragraph 5.e.(5)(d)2 has shed light on the paragraph itself. The light raises the following comment:</p> <p>A seat manufacturer, armed with the knowledge that they may choose the 42” (or 45”) limitation, could conceivably elect this certification path and at the same time elect not to employ design features to minimize head path.</p>	Add some controls to eliminate the noted option for seat manufacturers?	<p>We agree and have revised paragraph 5e(5)(d)2 in the proposed AC to clarify that only seats designed with the appropriate head path reducing features will be acceptable when using this method. It now states:</p> <p><u>“For seats that incorporate head path reducing features according to the note below, seats may be qualified without a head path test as follows: For seats typically identified as “economy” class seats during air carrier operations, place the seats 42 inches or more from the potential contact point. For all other “front row” seats (e.g., first or business class) the setback distance must be 45 inches or more. When using these dimensions, applicants should coordinate with the FAA or designee, as appropriate, and provide suitable justification for FAA evaluation....”</u></p>

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No.	Comment	Requested Change	Disposition
Commenter: Shannon Lennon, ANM-100B			
1.	<p>Regarding the Note under re-designated paragraph 5e(5)(d)2:</p> <p>The sentence, “using the same criteria for typical (non-front row) seats has not been validated and could result in these seats having head paths greater than the specified amount” suggests that an applicant may still utilize the indicated setback distances if they are appropriate for certain, non-front row seat designs—assuming that the applicant provides adequate justification.</p>	<p>Suggest that the note also include a reminder for applicants to coordinate with the FAA or designee, as appropriate or provide suitable justification when this setback data is utilized in conjunction with a non-front row seat installation.</p>	<p>We partially agree. Instead of revising the note, we have revised paragraph 5e(5)(d)2 to clarify that only seats designed with the appropriate head path reducing features will be acceptable when using this method. We also added a statement that the applicant should coordinate with the FAA or designee. Please see previous comment.</p>

No.	Comment	Requested Change	Disposition
Commenter: Mathew Fuller, ASW-112			
1.	<p>Page 12. Step 3 refers to “Figure 2.” I cannot find “Figure 2.”</p>		<p>We agree that the reference in Step 3 to “Figure 2” is incorrect. We have revised the proposed AC to refer “Figure 5-2.”</p>
2.	<p>Page 12. “Step 3d” refers to “Figure 3.” Again I cannot find “Figure 3.” Does this refer to Figure 3-1?</p>		<p>We agree that the reference in Step 3d to “Figure 3” is incorrect. We have revised the proposed AC to refer “Figure 5-2.”</p>
3.	<p>Page 17. Paragraph b (3rd paragraph under “b”)—“(for example IFE).”</p>	<p>Spell out or define “IFE.”</p>	<p>We disagree and have not revised the proposed AC. This change is not necessary because IFE is defined one page earlier in Step 4.</p>

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Commenter: Mathew Fuller, ASW-112			
4.	Page 55.	Spell out “Gpk.” I am guessing that is Peak G-loading.	We disagree and have not revised the proposed AC. This change is not necessary because “Gpk” is already defined on page 46 as “the magnitude of the peak value for the acquired pulse.”
5.	Page 74. Paragraph b(2)—“Variations to webbing color{typo}”	Remove “{typo}”	We agree and have changed the proposed AC as requested.
6.	Page 75. Paragraph c. “An additional test(s) must conducted for any of the”	Add a verb after must—“be.”	We agree and have changed the proposed AC as requested.

No.	Comment	Requested Change	Disposition
Commenter: AIR-500			
1.	Header Refer to this as “CHG 1” Reason: Consistency with other similar documents.	Replace header with “AC-25.562-1B CHG 1”	We agree and have changed the proposed AC as requested.
2.	Cover Page, paragraph 2 New text should not be in brackets with a change date Reason: The proposed format is a departure from the format used in AIR. The date of the change in the header and the change marks on the side are sufficient.	In the 3rd sentence, delete “and enclosed new text in brackets with the change date.”	We have changed the proposed AC as requested. However, we would like to point out that AIR-500’s guidance conflicts with the recommendation in AC Order 1320.46C, which states: “You should identify changed text by enclosing it in brackets and noting the date of the change inside the brackets.”

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Commenter: AIR-500			
3.	<p>Cover page, paragraph 2a</p> <p>There are appears to be confusion on how to format the change. The change pages (pages i and ii in this case) are supplemental to the current AC. There is no change required to the numbering of the original AC.</p> <p>Reason: Only changes to the content of the original AC should be included in the Change. The text in the original pages i and ii of the current AC appear to be unchanged.</p>	<p>Delete paragraph 2a and relabel the following paragraphs appropriately.</p> <p>Delete page new page iii from the content of this Change.</p>	<p>We agree and have changed the proposed AC as requested.</p>
4.	<p>Page ii, Change Control Chart</p> <p>The pages included in the change control chart are not the pages provided to us in Change 1</p> <p>Reason: Pages iii-iv were provided. However, the control chart calls out pages iii-vi,</p>	<p>Make sure that the numbers are correct and that the correct pages are included in this Change. We believe the change should only include pages 19-20.</p>	<p>We partially agree. The Page Control Chart called out pages “i through vi,” and we did provide those in Change 1 for your review. However, as pointed out in your comment above, we incorrectly numbered the supplemental pages (i.e., first two pages of Change 1) as pages i and ii and the subsequent front matter as pages as iii through vi. Since we agree that the supplemental pages do not need to be numbered, then the front matter does not need to be renumbered and included in the Page Control Chart. Therefore, we have removed reference to pages “i through vi” from the Page Control Chart. Further, we have removed those pages from Change 1.</p>

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Commenter: AIR-500			
5.	<p>Page iii-vi</p> <p>Delete these pages from change</p> <p>The text appears to be unchanged. Per the earlier comment, the Change 1 by itself does not change the page numbering of the original document</p>	<p>Delete these pages from the Change. The original AC pages are still correct.</p>	<p>Same issue as Comment #4. We agree and have changed the proposed AC as requested.</p>
6.	<p>Page ii,</p> <p>Missing signature block</p> <p>Reason: Per template, the signature block needs to be located below the Page Control Chart</p>	<p>Add signature block</p>	<p>We disagree and have not revised the proposed AC. This change is not necessary because this is a proposed AC, and we only include a signature block in the final AC.</p>
7.	<p>Page 20 Note</p> <p>Per earlier comment, delete brackets and change date from new text.</p>	<p>Delete brackets and change text from new text</p>	<p>Same issue as Comment #2. We have changed the proposed AC as requested.</p>
8.	<p>Pages 19-20</p> <p>The margins in these two pages appear to be different from the current AC.</p> <p>Reason: As a result, content of each unchanged line does not match the existing AC.</p>	<p>Try to match the original margins as much as possible. If you maintain the current margins in a version with Change 1 incorporated, double check that the pages in the table of contents doesn't need to be updated as well.</p>	<p>We agree and have revised the page margins in the proposed AC to match the original AC. The left and right margins were off by ¼ of an inch. Changing the page margins did not affect the page reference in the TOC, so no other change is necessary.</p>