

Disposition for Interdirector Comments

PS-ANM-25.815-01, Policy Statement on Compliance with Aisle Width Requirements of 25.815

	Commenter	Requested Change	Disposition
1.	Robert Kaufman ANM-150S	<p>pg 5, Second paragraph, last line</p> <p>This suggests that application of the rule has been consistent for part 121 operations. We have seen different interpretations and guidance for deployed IFE video monitors.</p> <p>These variations include:</p> <ol style="list-style-type: none"> 1) It is ok to encroach in-flight as long as there are no stable monitor and arm positions (no hard motion stops); 2) It is ok to encroach in-flight even if there are stable positions as long as a person can easily push the monitor out of their path while walking down the aisle (either direction forward or aft); 3) It is ok to encroach in-flight as long as the IFE monitor is placarded to require stowage during TT&L. <p>These monitors are getting larger and larger and we suspect that many are only being controlled per 3). Our guidance has been to follow 1). If IFE monitor encroachment in-flight is not a concern we should make that clear and explain why it's ok (even considering events like an unplanned ditching or accident where there is not time for the flight attendants to prepare the cabin for TT&L). If flight attendant control alone is ok we should state that in this memo or another. If it's not ok we should define it using clear criteria.</p>	<p>Although this policy statement was primarily only intended to address the positioning of seats under different types of operation, these are clearly important aspects of regulatory compliance as well.</p> <p>We revised this policy to address things like video monitors that have a transient encroachment into the required aisle but do not have a fixed or detent position that encroaches into the required aisle.</p>
2.	Neubauer ACE-118W	<p>Page 5, "Policy"</p> <p>Include the following as a condition: "Procedures must be established and documented in the AFM to ensure that the required aisle widths are provided during taxi, takeoff, and landing." This will allow the policy to align with SFAR 109, paragraph 11.</p>	<p>In this case, the need to restore these items is similar to closing of stowage compartment doors, or fastening curtains open for taxi, takeoff and landing. These actions are required for compliance, but the instruction is not repeated in the flight manual. SFAR 109 is a separate, different standard and the requirements for flight manual procedures are appropriate there.</p>

Disposition for Interdirector Comments

PS-ANM-25.815-01, Policy Statement on Compliance with Aisle Width Requirements of 25.815

	Commenter	Requested Change	Disposition
3.	R. Sprayberry, ATL-ACO ACE-117A	<p>Clarification: Where the policy speaks of aisle width less than the minimum dimension required by 14 CFR 25.815, we should clarify that “zero” is acceptable.</p> <p>Most executive aircraft manufacturers are going to go straight for the “zero” dimension so we should be specific to allow it or not allow it verbatim. Otherwise, inconsistencies will still arise where some ACOs will not allow zero and some will.</p> <p>If aisle width is truly allowed to go to zero as discussed above, then there will be cases where the executive aircraft manufacturers will want to show that passengers can still climb over (i.e. not keeping one foot on the ground at all times) aisle width obstacles with relative ease. This would allow for more consistency dealing with items already found in custom interior aircraft such as beds and fold out divans.</p>	Agree. The policy discusses the potential to reduce the aisle to zero, provided the other conditions are met.
4.	Robert Kaufman ANM-150S	<p>Policy, 1. , pg. 5: A period is missing after the first line.</p> <p>Also, after that period the next two lines seem to constitute a new section starting with 2.</p>	Corrected punctuation.
5.	Stephen Styskal, ANM-106B	<p>Page 5, 1.</p> <p>The first sentence of condition 1 appears to be missing a period.</p> <p>...operations. All...</p>	Corrected punctuation.

Disposition for Interdirector Comments

PS-ANM-25.815-01, Policy Statement on Compliance with Aisle Width Requirements of 25.815

	Commenter	Requested Change	Disposition
6.	Jan Risheim AIR-120	<p>Para 1.0 of the Policy section as currently written does not address aircraft exported to non-US carriers. Revise first sentence as follows:</p> <p>“The airplane is not listed, or required to be listed, in any air carriers operations specifications for part 121 operations <u>or equivalent non-US operations.</u>”</p>	<p>As a matter of consistency, this is a reasonable suggestion. From the standpoint of the FAA’s authority and oversight, however, we don’t have visibility of how the requirement has historically been applied worldwide, and so cannot say that this policy reflects the actual practice everywhere it might be used. In addition, it’s not clear that there are always requirements “equivalent” to part 121, and that would further complicate application of the policy. Nonetheless, we agree that clearly analogous operations should be treated the same way, to avoid complications when airplanes are exported, and the policy is revised accordingly.</p>
7.	Nguyen ACE-118Wa	<p>Page 5, Policy condition 1.</p> <p>I think there’s a “not” missing in front of “required to be listed” and missing a period after “121 operations.”</p> <p>Also, does the accessibility requirement include accessibility to any emergency equipment when the furnishings are in the most adverse position because it’s not clear in the statement “All areas of the cabin...”, meaning areas of the cabin remain accessible but a repositioned furnishing may be blocking access or removal of an emergency equipment when it would not otherwise in its normal position for taxi, takeoff, and landing.</p>	<p>The intent is that all emergency equipment is accessible, with seats and furnishings in any position. The requirements for emergency equipment accessibility do not make a distinction on when the equipment must be accessible, and the historical practice is to assess furnishings in any position.</p>
8.	L. Taylor ACE-111	<p>Page 5 Number 1 in Policy, second sentence, says all areas in the cabin remain easily accessible.</p> <p>Suggest the words in SFAR 109 would be better:</p> <p>“Compliance is required with Sec. 25.815, except that aisle width may be reduced to 0 inches between passenger seats during in-flight operations only, provided that the applicant demonstrates that all areas of the cabin are easily accessible by a crew member in the event of an emergency (e.g., in-flight fire, decompression).”</p>	<p>In this case, the policy is reflecting compliance with the rule, but varies depending on how the airplane is used. The policy formalizes the practices that have been in place for nearly 50 years. The SFAR on the other hand actually relieves compliance from the requirement, which policy cannot do.</p> <p>No change.</p>

Disposition for Interdirector Comments

PS-ANM-25.815-01, Policy Statement on Compliance with Aisle Width Requirements of 25.815

	Commenter	Requested Change	Disposition
9.	Robert Kaufman ANM-150S	<p>Policy, 2., 2nd line, pg. 5:</p> <p>This example is confusing, suggest you delete or simplify it to explain the basic meaning.</p>	Based on comments received, and upon reconsidering this issue, we revised the policy to apply to airplanes limited to 19 passengers or less, regardless of the original type certification limits. So, the example is no longer needed.
10.	Nguyen ACE-118Wa	<p>Page 5, Policy condition 2.</p> <p>Please clarify if this limitation also applies to design changes (removal of exits and reduction of passenger capacity) done by amended TC, STCs or amended STC because it is not exactly clear since under the Implementation section it states that the policy applies to type certificate, amended type certificate, supplemental type certificate, and amended supplemental type certification programs.</p>	Based on comments received, and upon reconsidering this issue, The policy has been revised to apply to airplanes limited to 19 passengers or less, regardless of the original type certification limits. So, the example is no longer needed.
11.	Leung Lee ANE-171	<p>Page 5, Item 2. Policy should define a specific requirement and support with an example as shown, when necessary.</p> <p>Recommend revising: “Airplanes designed for more than 19 passengers could not have exits removed or rendered inoperative to reduce the passenger capacity to 19 or less to meet the condition specified herein. For example, airplanes designed for more than 19 passengers with three pairs of Type I or Type C required exits could not have exits removed or rendered inoperative in order to reduce the passenger capacity to meet the condition specified.</p>	Based on comments received, and upon reconsidering this issue, The policy has been revised to apply to airplanes limited to 19 passengers or less, regardless of the original type certification limits. So, the example is no longer needed.
12.	C. O’Kelley ATL-ACO ACE-117A	<p>3. Any cabin furnishing (e.g., seat, table, or divider) that can be positioned to intrude into the aisle is clearly placarded to be in the proper (i.e., not intruding into the minimum required aisle) location during taxi, takeoff, and landing. Suggest replacing with “be returned to the proper TT&L positions.”</p> <p>This is similar verbiage as listed in item 5.</p>	Agree that the language can be more consistent; however, the explicit statement of what “proper” means is necessary to make sure there is no confusion about what is intended.

Disposition for Interdirector Comments

PS-ANM-25.815-01, Policy Statement on Compliance with Aisle Width Requirements of 25.815

	Commenter	Requested Change	Disposition
13.	Patrick Gillespie, ANM-106B, Leung Lee, ANE-171; M. H. Amini, ACE-117; A Nguyen - ACE-18W; L. Taylor ACE-111	Page 5, paragraph 4. Change 4 to 3. e.g., “the placard discussed in 3 above,...”	Corrected.
14.	Potter – ACE-118W Page5, item 4	Change “naïve test subjects.” to “all occupants.”	In principle, this is the intent. However, the terminology “naïve test subjects” is common for this type of assessment, and is a means of determining that “all occupants” would be able to accomplish the necessary tasks. No change.
15.	ASW-111	p. 5, 2 nd ¶ Since this is specific to transport airplanes, would “flying” public be more appropriate? Use of traveling public is too broad since it applies to travelers on boats, cars, trains, buses, etc.	Agree. Changed.
16.	ASW-111	p. 5, first bullet It states accessibility must be demonstrated to the FAA. Is this a regulatory requirement or is it a requirement of the policy?	Broadly speaking, the regulatory requirement is for an applicant to show compliance. The FAA has discretion to make direct findings of compliance on whichever requirements deemed appropriate. In this case, the policy is that the FAA will exercise its discretion to make the determination of accessibility.
17.	Gregory Thiele ASW-190	Rather than releasing this policy, amend 14 CFR 25.815 to list these conditions as exceptions to the regulation.	There may be a need to address the regulatory requirement. However, in the meantime, the policy is needed to foster standardization and clarify how the rule should be applied.
18.	Gregory Thiele ASW-190	How does this policy relate to AC 25-17A, 441(b)(1), 442(b)(1), and 443(b)(4)? State clearly whether this policy supersedes is used in conjunction with or is superseded by AC 25-17A.	This policy supplements the guidance in AC25-17A, and we revised it to state so.
19.	Gregory Thiele ASW-190	If an applicant chooses to comply with SFAR109, ¶11, does the applicant need to follow this policy? State clearly whether this policy supersedes, is used in conjunction with, or is superseded by SFAR 109 (when they opt to follow SFAR 109).	SFAR 109 is a stand-alone regulation. We revised the policy accordingly.

Disposition for Interdirector Comments

PS-ANM-25.815-01, Policy Statement on Compliance with Aisle Width Requirements of 25.815

	Commenter	Requested Change	Disposition
20.	Gregory Thiele ASW-190	Policy, first paragraph: Change “under the following conditions” to “under all of the following conditions.” As currently worded, an applicant could argue that meeting one of the conditions alone is sufficient.	Agree; this will make it clearer. We revised the policy accordingly.
21.	Gregory Thiele ASW-190	Policy condition 1: Condition 1 contains two topics (121 operations; cabin accessibility). Split into two separate conditions.	Agree. Changed.
22.	Gregory Thiele ASW-190	Policy conditions 1 & 3: ANM-115-08-02 (obstruction of exits on these same type airplanes) clearly states why placards alone are insufficient to ensure a clear TTL egress path (exit opening), but the conditions in this policy allow placards alone to ensure a clear TTL egress path (aisle width). Modify the accessibility requirement from Condition 1 to include evacuation egress with interior furnishings in the most adverse positions.	With the conditions noted, and the provision to show accessibility to the entire cabin, this policy indirectly addresses the potential for items to be out of position during critical phases of flight. However, the comment is well taken, as the conditions under which a placard is sufficient do vary.
23.	Gregory Thiele ASW-190	Combine policy conditions 1 & 4 as they are related.	Disagree. We revised to split condition 1 into two conditions. This second condition pertains to accessibility, and the other condition to required placards. No change.
24.	Gregory Thiele ASW-190	Is this policy harmonized with the policy being developed by EASA? If not, coordinate, and harmonize with EASA.	The policy is coordinated and, to the extent possible, harmonized with EASA.
25.	Carl Johnson AFS-820	Page 4, footnote: Part 121/135 rules specify “maximum seating capacity,” but part 91/125 rules specify “passengers on board.” See 91.533 and 125.269. Amend footnote to clarify.	We clarified the footnote.