

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|    | <b>Commenter</b>                     | <b>Requested Change</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Disposition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| 1. | Comlux America                       | <p>Without knowing the specific motivations for the proposed limitation on aircraft size to those which the original type design limits seating to 19 passengers or fewer, I would deduce that the purpose of the limitation is twofold: on a larger aircraft a crew member could not see the cabin as easily as on a smaller aircraft, and larger aircraft can have more complex interiors.</p> <p>We believe that the limitation to aircraft with an original type certificated seating capacity of 19 or less is unnecessarily restrictive.</p> <p>We propose, instead, extending the relief from § 25.815 to aircraft of any size which have a seating capacity of 19 passengers or fewer, provided all other conditions in the policy statement are met.</p> | <p>This policy was intended to limit this allowance to airplanes for which the space available was not sufficient to permit the type of arrangement required while at the same time maintaining the required aisle width dimensions at all times, (i.e., there was arguably a practical necessity for aisle encroachment in flight). The visibility provided to crew was not a factor. While it is true that the interior of larger airplanes can be more complex, this was also not the primary reason for this proposal, as noted. Several commenters made a similar proposal, and suggested that the policy be applicable to any airplane with a passenger limit of 19 or fewer for a particular configuration.</p> <p>Based on the number of comments on this issue, the FAA has reviewed the subject again. In fact, when taken in combination with the limitations that are part of the policy, larger airplanes in general do provide more flexibility and greater evacuation capability for a given passenger capacity. Thus, notwithstanding that such airplanes could in principle more easily maintain the required aisle width, they could be operated in the same way as the smaller airplanes and, given that the policy is primarily making a distinction on operational grounds, the policy should apply equally.</p> <p>After further consideration, the FAA agrees that the passenger limit on a particular airplane configuration should drive the use of this policy, and we have modified the policy accordingly.</p> |
| 2. | Brad Christensen<br>C&D Zodiac, Inc. | <p>Training provided to our designees over the years has been that momentary reduction of aisle widths is acceptable during flight when the passengers are allowed to use cabin amenity features such as lavatories and overhead stowage bins, and reductions are also acceptable when the cabin crew are using galley features (such as doors, drawers, and tables). We request some clarification of these situations be provided in the policy also.</p>                                                                                                                                                                                                                                                                                                       | <p>Several commenters noted that the aisle width can be encroached upon in a transient way by features other than those mentioned in the proposal. The FAA agrees. This policy was not intended to address features such as lavatory doors, or armrest caps, or stowage compartment doors that might encroach into the aisle when open. The intent of the policy was to differentiate between part 121 and other operations with</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|    | Commenter                                                          | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|    |                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>respect to the aisle width requirement of § 25.815 for translating and moving seats. However, the FAA agrees that these are legitimate concerns and the policy should be comprehensive.</p> <p>We revised the policy to clarify that it does not apply to features such as lavatory doors, or armrest caps, or stowage compartment doors that might encroach into the aisle when open.</p>                                                                                                                                         |
| 3. | Contour Aerospace, Sicma Aeroseat, Weber Aircraft and Zodiac Seats | <p>Because this is an installation specific requirement; i.e., related to the approval of the installation and not the seat TSO itself (TC/STC /ATC/ASTC); this will be applicable to existing previously ETSO- and TSO-approved seat designs (granted that ETSO and TSO do not constitute an installation approval). Therefore by the wording of this policy; ETSO and TSO approved seat designs (catalogue or derivative programs) for new TC/STC/ ATC/ASTC applications after the affectivity date of this policy will require a design change to comply in the new installation. In such cases, could the previous installation approval be used as a basis for an acceptable condition, knowing it would definitely conflict with the wording in the present policy statement?</p> | <p>To a large extent, this policy is intended to encompass certain practices that are already in place for airplanes other than those operated in part 121 but not in strictly private use.</p> <p>Thus, the implementation of the policy is not expected to introduce any burden on applicants. Nonetheless, as is typical of policy statements, we expect it to be implemented as new findings of compliance are needed, or for new projects.</p> <p>As noted in the comment, it does not directly affect approvals under TSOs.</p> |
| 4. | Airbus SAS                                                         | <p>Page 4, Section 5, 2nd paragraph</p> <p>Provided the cabin remains easily accessible in the event of emergency with the interior deployable items in their most adverse position (e.g., the features are easily pushed away), there should be no restriction whether the aircraft is for executive or public transportation during cruise.</p> <p>This draft policy is related to CFR section 25.815 and is understood as being applicable to new design only. Further, it is understood that any cabin alteration below the level of a significant mayor change continues to be regulated by the aircraft type certification basis and agreed interpretations thereto.</p> <p>To prevent confusion and to ensure a common understanding</p>                                         | <p>The FAA recognizes that there are existing transient conditions where an item might encroach into the required aisle width, and these have historically been acceptable. The proposed policy was not meant to address those features, although as worded could be interpreted to curtail them in part 121 operation.</p> <p>We have revised the policy to clarify the types of conditions that continue to be acceptable, along with criteria for determining that they are acceptable.</p>                                        |

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|    | Commenter                   | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|    |                             | <p>among TC/STC holders, FAA and operators, the final policy should not be more restrictive than existing interpretations.</p> <p>Explicitly state this policy’s applicability, in particular with regard to public transportation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 5. | Airbus                      | <p>Page 4, Section 5</p> <p>With respect to the aisle width requirement, the only operational distinction that has been consistent is the maintenance of the required aisle at all times during flight in part 121 operations.</p> <p>This appears to be too rigid when considering AC 25-17A, which allows under certain circumstances a possible encroachment of the foldable armrest, in flight.</p> <p>Differentiation between the different phases of flight (e.g., TT&amp;L vs. cruise) for the application of § 25.815 should also count for part 121 operations. This policy should be the opportunity to introduce acceptable conditions allowing aisle encroachments of some foldable items in flight for part 121 operations as well.</p>                                          | See comment 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6. | Airbus Corporate Jet Centre | <p>Policy 3, 4, &amp; 5</p> <p>The FAA position expressed in the policy indicates that the FAA considers sufficient that the clearance of the aisle (for TT&amp;L) be managed by passengers instructed to do so by dedicated placards sufficiently efficient to secure the action.</p> <p>“Naïve” subject testing requirement: The naïve subject testing requirement applied to executive airplanes is against the spirit of SFAR 109 (and the EIR WG activity) where the allowances for increased cabin flexibility are based on the principle that the concerned passengers will become familiar with the aircraft characteristics and TT&amp;L configuration, and will have an enhanced awareness of the cabin features, thus a practical knowledge on how to move items in the cabin.</p> | <p>The FAA considers instructional placards adequate <i>in certain circumstances</i>, when shown to be effective. However, there are also circumstances that we consider placards inadequate to address.</p> <p>With respect to naïve subject testing, the intent is that persons who are otherwise unfamiliar with the general procedures and instructions will be able to understand what to do from reading the placard. Tests will not be required in all cases. The person making the compliance finding will determine whether substantiation by test is needed in conjunction with the FAA oversight office. However, recognizing the concerns regarding non-standardized application of the criteria, the policy has been amended to discuss the conditions where tests would be needed and expectations for naïve test subjects.</p> |

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| Commenter | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|           | <p>In addition, a lack of guidance on the conduct of naïve subject testing when specified will have the effect to let the applicants and/or authority make their own interpretation projects after projects, and it is likely that very rapidly the FAA will observe an inconsistent application despite its attempt through this policy to harmonize the situation.</p> <p>Considering the inefficiency in aircraft cabin harmonization of a requirement for “naïve subject testing” if no clear guidance material is issued, drop this requirement and require the locations of the placards to be “conspicuously located such that the information is visible from each possible seat position, or from the aisle for items not accessible from passenger seats.”</p> <p>Responsibility of the pilot in command: One of the past practices indicated by the FAA was to consider the aisle width requirement only in TT&amp;L flight phases, with local placards on or adjacent to certain furnishing to indicate their position for TT&amp;L. The FAA indicates that for aircraft not required to have flight attendants the cabin configuration management by means of placards “places the responsibility on the passengers to restore the furnishings to the TT&amp;L position, especially if there is no flight attendant on board.”</p> <p>There is an inconsistency between this exposed FAA consideration and the final decision to finally “place the responsibility on the passengers to restore the furnishings to the TT&amp;L position.”</p> <p>The lack of association of this decision with crew procedures that, even for aircraft that are not required to have flight attendants by operating rules, are applicable under control of the pilot-in-command. Indeed, under ICAO Annex 6 Part 1 §4.5 “Duties of pilot-in-command” the management of specified cabin configuration is the pilot-in-command’s responsibility even when no flight attendant is on board to whom delegate this responsibility: ICAO Annex 6 Part 1 § 4.5 reads “pilot-in-command shall be responsible for the safety of all crew members, passengers and</p> | <p>The FAA agrees that the ultimate responsibility for the required procedures and limitations lies with the pilot in command. However, from a practical standpoint, the pilot in command cannot monitor every such requirement continuously. Thus, while technically correct, it is not reasonable to expect the pilot in command to actually carry out actions such as storing tables and moving seats. Therefore, the passengers would have to do these things to bring the airplane into a compliant condition. This is not an inconsistency, but simply recognition of the limitations of what can take place in service. No change in this regard.</p> <p>The policy does not address monitoring systems, because the intent is to establish the requirements for maintaining the required aisle widths. Should an applicant want to propose an alternative approach using monitoring under the provisions of § 21.21(b)(1), that would require a separate determination. No change.</p> |

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|     | Commenter               | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Disposition                                                                                                                                                                        |
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|     |                         | <p>cargo on board when the doors are closed. The pilot-in-command shall also be responsible for the operation and safety of the aeroplane (...).”</p> <p>In a situation where the certificating authority places the responsibility for cabin management on the passengers by means of placards, it is suggested to also associate crew procedures to enforce the requirement.</p> <p>Credit for monitoring systems: The policy proposes no benefit for systems that indicate the proper TT&amp;L position of some specific cabin items creating obstructions likely to slow emergency evacuation (as this is currently required for private use aircraft in case of interior doors that may be located between a TT&amp;L passenger seat and an exit). Such system would ensure that the item configuration is correct for TT&amp;L. Therefore, the policy should consider alleviation to points 3 to 5 for items for which a monitoring system indicates the appropriate crew member that the item is not in its TT&amp;L position.</p> |                                                                                                                                                                                    |
| 7.  | RECARO Aircraft Seating | This policy cannot clarify current seat design aspects. The conclusion does not clarify the applicability in regard to the number of passengers or the type of aircraft (executive or air carrier).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | We have revised the policy to clarify the applicability and the aircraft category.                                                                                                 |
| 8.  | RECARO Aircraft Seating | The applicability is for aircraft with 19 or fewer passengers. Thus it should not affect all other types of aircraft. Therefore the policy describes the conditions, under which the aisle width could be less than the required according to § 25.815 for aircraft that do not operate under part 121.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The policy applies to larger (i.e., greater than 19 passengers) airplanes by virtue of stating that the required aisle width must be maintained at all times. No change.           |
| 9.  | RECARO Aircraft Seating | There is no information about restoring aisle width by movement of seat components (e.g., encroaching video arms into the aisle).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The policy has been updated to address this issue, as was addressed by other commenters as well.                                                                                   |
| 10. | RECARO Aircraft Seating | Current seat design of RECARO aircraft seating has accepted deviation during flight phases (not during taxi, take-off, and landing)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | This policy applies to phases of flight that are not critical, as defined in the “Definition of Key Terms” section.                                                                |
| 11. | Embraer                 | It appears that airplanes operating in part 135, or those with 19 or fewer passenger seats, are allowed to provide a different level of cabin safety to those operated in part 121 or with larger passenger                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | The policy does not differentiate levels of safety, except to acknowledge the differences between airline and other operations. The policy explains the historical perspective and |

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|     | Commenter | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |           | <p>capacities. While that is true for specific areas of the airworthiness and operating regulations, in the case of aisle width in executive interior airplanes regardless of size, an adequate level of safety is provided in spite of any inflight encroachment by virtue of the fact of the much lower passenger seating density of the interior compared with that of a typical air carrier (meaning one configured with seats in repetitive rows as described in the draft memo). This has been the basis of the specific alleviation granted to “executive use” aircraft and is not related to the applicable operating rule, passenger capacity, or exit configuration.</p> <p>Concerning past practice, executive interior airplanes larger than those limited to 19 seats based on emergency exit configuration (e.g., Boeing BBJs and Airbus ACJs) are currently being offered for charter. These airplanes feature the same deployable features like berthable divans and swiveling/reclining seats that are relevant to the proposed policy. Embraer is aware of no adverse service history that would indicate that this previously acceptable practice should not be allowed to be continued, yet the policy would not permit certification of these features in the future. Because this part of the proposed policy is such a drastic departure from past practice and because it would now divide compliance with 14 CFR 25.815 into two different classes of airplane, Embraer believes that it should only be implemented after formal rulemaking, with the requisite regulatory evaluation.</p> | <p>the basis on which findings have been made since a 1963 decision. The 1963 decision had used terms with no common definition and so the policy brings the distinctions intended up to date. “Executive use” is one of those terms and at the time it was used was related to the operating rules in effect. The policy captures actual practice and reliance on the determination made in 1963. Although the language of the regulation is the same the actual practice has been different for airplanes of different size and operation, and the policy formalizes that. No change.</p> |
| 12. | Embraer   | <p>Proposed Eligibility Criteria</p> <p>The inherent feature of executive interiors that allows aisle encroachment while still maintaining the required level of safety for both emergency egress and access for inflight emergencies is the lower level of passenger density compared to configuration typical of scheduled air carrier operations. While this measure of density does not align with existing regulations in Part 119, which uses maximum passenger capacity and payload, it is the only determinant that accurately describes executive interiors, especially in larger airplanes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Passenger density is an interesting approach, and might be a consideration for future policy. However, since there are no defined criteria on how passenger density would be used, the policy will continue to use passenger capacity.</p>                                                                                                                                                                                                                                                                                                                                               |

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|     | Commenter                                                                                                | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Disposition                                                                                                                                                                                                                                                                                        |
|-----|----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                          | This issue is currently being debated in the EASA Executive Interiors Working Group, and the direction of the group from the beginning for the larger airplanes has been to use a maximum density measure, as defined by the installed number of passenger seats divided by the maximum allowed by the TCDS for the “parent model” (all of these larger airplanes are derivatives of higher-density, scheduled air-carrier airplanes). While the maximum density value has not been established, the current thinking is that an executive interior density of one-third or less is sufficient to compensate for any aisle encroachment. Embraer believes that this is a much better measure than the proposed limit that effectively limits the applicability of the policy to manufacturers that do not also build air carrier airplanes. |                                                                                                                                                                                                                                                                                                    |
| 13. | Zhang Zhuguo<br>Shanghai Aircraft<br>Airworthiness<br>Certification<br>Center of CAAC<br>Shanghai, China | <p>Page 1, it states that “in-flight” means other than “critical phases of flight” which includes all ground operations, involving taxi, takeoff, and landing and all other flight operations conducted below 10,000 feet, except cruise flight.”</p> <p>While page 5 states that “flight (but not during taxi, takeoff and landing).” This may lead to confusion.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Agree. We changed the parenthetical phrase to “critical phases of flight.”                                                                                                                                                                                                                         |
| 14. | Gulfstream                                                                                               | Gulfstream requests clarification on interior furnishing requirements, and possible another applicable paragraph.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | As discussed above, the policy is modified to address other items that are transiently positioned.                                                                                                                                                                                                 |
| 15. | Embraer                                                                                                  | The order in which different models are certified should have no effect on the technical standards that apply. An arbitrary standard that has no basis in safety is not a reasonable regulatory practice and should not go forward. Based on this, Embraer’s position is that the first sentence of Paragraph 1 and all of Paragraph 2 of the proposed policy should be deleted.                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The FAA agrees that there are airplane models for which the criteria of the proposed policy become problematic. As discussed above, the passenger capacity limits have been reconsidered, to apply to the airplane as configured, rather than the largest certificated model of the airplane type. |
| 16. | Brad Christensen<br>C&D Zodiac, Inc.                                                                     | <p>Section 5, paragraph 2</p> <p>The second paragraph in Section 5 recognizes that traditionally some cabin items under control of flight attendants were not deployed when making the aisle width evaluations.</p> <p>We suggest that this paragraph also include a reference to lavatory</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | As noted, the policy has been revised to address these items.                                                                                                                                                                                                                                      |

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|     | Commenter      | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Disposition                                                                                                                                                                                                                                                          |
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|     |                | and overhead stowage bin doors and galley tables for clarity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                      |
| 17. | Comlux America | <p>Item two of the Policy section does not seem to allow the ACJ or BBJ series airplanes that are operated for private use. By using the statement "...is of a model of airplanes..." suggests to this reader the intent is the "type certified" model of airplanes.</p> <p>I trust the intent here is that the final configuration of the private airplane being modified will not have a final exit configuration that limits the maximum passenger capacity to 19 or fewer passengers. That seems to be the intent of the "For example..." that follows the highlight.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The intent actually was to restrict this policy allowance to airplanes that are basically sized to hold a maximum of 19 persons. However, based on the comments received, we have modified the policy as discussed above, to reflect the commenter's interpretation. |
| 18. | Airbus SAS     | <p>Section "Policy", Page 5, paragraphs 1 to 5</p> <p>Items 1 and 2 of this policy allow the main passenger aisle to be reduced to less than the minimum dimensions required by CFR 25.815 in flight, is:</p> <ul style="list-style-type: none"> <li>- applicable when the aircraft is operated in private transport, whatever the maximum approved seating configuration of the individual aircraft (for instance set by cabin interior STC);</li> <li>- not modifying, for private transport operations, SFAR 109 requirement on width of aisle;</li> <li>- not applicable when the aircraft is operated in public transport under CFR 121 but applicable under CFR 135;</li> <li>- applicable to aircraft types whose FAA TCDS shows a maximum approved passenger configuration of 19 or less: meaning, for instance, not relevant for Airbus aircraft that might be operated under CFR part 135—with proper payload limitation—even if the maximum approved seating configuration for the individual Airbus aircraft would be limited to 19 or less (for instance, via cabin interior STC).</li> </ul> <p>Clarification is needed to make sure that this policy is in line with,</p> | SFAR 109 is a separate rule with its own criteria. We revised this policy to clarify that it does not apply to SFAR 109.                                                                                                                                             |

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|     |                             | <p>and not more restrictive than, SFAR 109, especially regarding the seat number limit of 19 in paragraph 2.</p> <p>Airbus recommends further clarifying the repercussions and interactions between this policy and SFAR 109.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                  |
| 19. | Airbus Corporate Jet Centre | <p>Compatibility with SFAR 109: Despite the statement that the general policy stated in the document “does not constitute a new regulation”, it contains new interpretation (like exclusion of part 121 aircraft, or exclusion of aircraft initially designed for more than 19 passengers).</p> <p>It is not clear how this policy interfaces with the SFAR 109 “aisle width” requirement (also the requirement on “interior doors” since it may constitute an aisle obstruction when closed):</p> <p>In SFAR 109:</p> <ul style="list-style-type: none"> <li>• Aisle width may be reduced to zero inches, either by cabin furniture item (e.g., seats recline, swiveling, deployable items) but also by interior door when closed.</li> <li>• Aisle width of aircraft with a TC initially designed for more than 19 passengers may be reduced to zero inches (i.e., B737 BBJ or A319 ACJ).</li> </ul> <p>In the proposed policy:</p> <ul style="list-style-type: none"> <li>• Private use aircraft applying for approval in compliance with SFAR 109 are concerned (not part 121 operations) and shall therefore comply with the indicated additional requirements in addition to those of SFAR109.</li> <li>• Aisle width shall comply with the dimension required by 14 CFR 25.815 in all flight phases for aircraft with TC initially designed for more than 19 passengers (i.e., Boeing B737 BBJ or Airbus A319 ACJ) are explicitly excluded from non-</li> </ul> | As noted in comment 19, We revised this policy to clarify that it does not apply to SFAR 109. With respect to the perceived new interpretation regarding part 121, this policy provides consistency with the historical practice, considering the modifications discussed above. |

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|     | Commenter                                                                                                | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Disposition                                                                                                                                                                                                                                                           |
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|     |                                                                                                          | <p>compliance in non-TT&amp;L flight phases).</p> <p>May the FAA clarify if the proposed policy applies to aircraft for which SFAR109 approval is sought?</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                       |
| 20. | Zhang Zhuguo<br>Shanghai Aircraft<br>Airworthiness<br>Certification<br>Center of CAAC<br>Shanghai, China | Page 5, if a seat can translate or swivel, after all, the relative requirement about emergency equipment usually being used in flight, for example, the oxygen dispensing unit requirement under § 25.1447, should not be compromised. And, the firm handhold requirement under § 25.785 should not be affected.                                                                                                                                                                                                                                                                                                                                                                                                    | The requirements noted are still applicable, with interior features in any position. This is covered to some extent in AC 25-17A. This policy addresses § 25.815, so expanding the discussion beyond that regulation would be beyond the scope of the policy.         |
| 21. | Dassault Aviation<br>France                                                                              | Policy point 1 addresses two different aspects that should be split in two different points (part 121 operation is one point, cabin area accessibility is another point).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Agree. We split item 1 with a new 2 and renumbered the remaining items accordingly.                                                                                                                                                                                   |
| 22. | General Aviation<br>Manufacturers<br>Association                                                         | The first and second sentence appears to be separate conditional statements and may be intended to be separate paragraphs. Therefore, GAMA suggests the FAA begin a new paragraph beginning with the second sentence.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Agree. Changed.                                                                                                                                                                                                                                                       |
|     |                                                                                                          | <p>Consistent with the requirement of § 21.21, that the applicant shall show compliance, GAMA requests consistent use within this policy to part 21 rather than the proposed language which uses demonstration. This will ensure that the policy remains consistent with the requirements of part 21 and reduces potential inconsistencies of acceptable methods of compliance. It's more appropriate to use the term shown because there are various methods to show compliance and should not be limited only to demonstration.</p> <p>Therefore GAMA suggests the FAA reword the last sentence to read "Accessibility must be shown to the FAA by demonstration, test or analysis supported by test data..."</p> | Agree. Changed.                                                                                                                                                                                                                                                       |
| 23. | Airbus Corporate<br>Jet Centre<br>Policy, 1                                                              | There is no indication on the extent to which an aisle may be reduced, and therefore it is understood that the FAA does not object for an aisle width reduction down to zero inches during flight phases other than TT&L as long as accessibility to all cabin areas is satisfactorily maintained.                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>While there is some subjectivity, the term "easily accessible" is intended to describe the condition created by the reduced aisle, and indicate that there is a time element involved.</p> <p>With respect to the responsibility of the crew to gain access to</p> |

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

| Commenter | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p>The “easily accessible” requirement is a subjective criterion that may lead to long discussions and lack of harmonization between applicants if it is not specified that it applies to persons (passengers or trained crew members) that have “normal” physical capacities. It is our understanding from other meetings with the FAA that the FAA intent is to allow climbing over obstacles if required.</p> <p>It is clear from the available material (as SFAR 109) that the necessity to access certain cabin area in the event of in-flight fire or decompression is the one of the flight attendants, or flight crew if there is no flight attendant on board. Proper precautions must be taken in the policy to prevent interpretation that incapacitated crew members (or passengers) must also “easily” access the other side of the obstruction. For example, the demonstration shall allow the test subject to “push” or “step” on or over the obstacles.</p> <p>The reference to fire or decompression as scenarios where cabin accessibility could be critical may lead to a severe burden unless it is clearly stated that the possible consequences of such events on cabin furniture need not be considered when assessing cabin accessibility. Airplane structure and systems, including cabin furniture, will be considered fully operative, without consideration for possible failures resulting from a fire, a decompression, or other event. Otherwise, it will never be possible to demonstrate anything.</p> <p>The determination of the most adverse configuration may be controversial and may lead to the same inconsistent interpretation the FAA is willing to solve with the proposed policy. We know by experience on simpler cabin safety issues how difficult it may be to reach a common understanding of what is the most adverse configuration. With a complete cabin, there are so many degrees of freedom that this kind of requirement will most likely generate lots of discussions between an applicant and the FAA. The movable items should be better defined (e.g., drawer, stowage door, doghouse drawer). These may temporarily encroach on the aisle,</p> | <p>the cabin in an emergency, this is true, however, passengers may also need to traverse the cabin to gain access to emergency equipment or their seat. There is no intent to apply those criteria to an incapacitated person, just as the typical equipment access criteria do not apply to incapacitated persons.</p> <p>The policy is revised to be clear that the effect of the emergency does not have to be considered when assessing accessibility.</p> <p>Determination of most adverse conditions is a commonplace occurrence for certification. While there may be some discussion on the specifics, this policy is not unusual in this respect.</p> <p>Assuming that the position of individual items does not preclude the positioning of other items, then this may</p> |

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter                | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                          | <p>but they should not be considered adverse because they can be stowed rapidly.</p> <p>Finally it might also be considered that a succession of adverse interior items position may excessively slow the movements in the cabin even if each obstacle may be easily crossed over when taken individually. More precise “pass” criteria focused on the safety objective (rapidity of crew action for example) is needed for the compliance demonstration.</p> <p>Easy access definition: Add guidance material on the test subject (e.g. “normal” (healthy) 5th percentile female carrying a fire extinguisher of maximum capacity present in the cabin) and guidance on “pass” criteria for the compliance demonstration.</p> <p>Most adverse configuration determination: The FAA should specify the nature of movable items, and harmonize with other relevant existing FAA policies, e.g., ANM-115-08 dealing with accessibility to type III emergency exits on airplanes with less than 19 passengers. The FAA should specify that “only detent or locked positions need to be evaluated” in the determination of the most adverse configuration. The FAA should clarify that the airplane structure and systems, including cabin ones, should be considered as fully functional and without failure.</p> <p>Wording consistency: The reference to “interior furnishings” in Point 1 does not match the reference to “cabin furnishing” in Point 3 and Point 5. Was it done intentionally?</p> | <p>constitute the most adverse condition, and should be part of the assessment.</p> <p>These are all reasonable considerations, but go beyond the scope of this policy. The use of naïve subject demonstrations is not uncommon, and should be something that an applicant and their local FAA office can come to agreement on.</p> <p>With respect to determining the most adverse position, this is not meant to be any more complex than what is currently done when making such assessments. We agree that the items in question can be considered fully functional, and the policy is revised to make this clear. We also revised the policy to refer to “interior furnishings.” (See comment 27)..</p> |
| 24. | Dassault Aviation France | <p>Policy point 1 refers to fire or decompression as scenarios where cabin accessibility could be critical. It should be clear that the possible consequences of such event on cabin furniture need not be considered when assessing cabin accessibility. Cabin furniture will be considered in its normal position and fully operative, without consideration for possible failures resulting from a fire, a decompression, or other event. Otherwise, it will never be possible to demonstrate anything.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Agree. As noted above, the policy now makes this clear.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | <b>Commenter</b>         | <b>Requested Change</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Disposition</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 25. | Dassault Aviation France | Policy point 1: Cabin accessibility is defined using the word “easily,” which is not accurate enough to avoid discussions and diverging interpretations in the implementation of the policy. For instance, it is Dassault Aviation and Dassault Falcon Jet’s understanding from other meetings with the FAA that the FAA intent is to allow climbing over obstacles if required. If this is correct, such allowance should be written.                                                                                                                                                                                                                                                                                                                                                                | The intent of using the word “easily” is to indicate that access to all parts of the cabin should not require extraordinary effort. An applicant is free to propose a more quantitative method for establishing whether the installation is acceptable. However, to make it clear that stepping on/over obstacles can still be considered acceptable, the policy is revised to so state.                                                                                                                             |
| 26. | Gulfstream               | This policy could challenge an interior compliance DER/EAR to find combinations of devised tests of “easily accessible” versus “adverse position” until the test has failed. Gulfstream requests that the policy define the term “easily accessible” in terms of the passenger position (e.g., this could mean: from a seated position, seat belt fastened, standing, or reaching emergency equipment within a certain time frame, etc). Gulfstream recommends defining the term “adverse position” as one interior arrangement with a combination of seats out of position, seats reclined in exit rows, berthing divans deployed in aisles, and other interior furnishings. Further guidance should be included in the policy to help these guidelines be applied consistently across the industry. | This common terminology is typical when making compliance findings. As noted above, the policy is revised to mention stepping on or over obstacles, and applicants are free to propose a quantitative measure for establishing acceptable access. While there will be some variation from one interior arrangement to another, the basic principles in establishing the most adverse conditions are unique to this requirement and can be discussed with the FAA during the certification process.<br><br>No change. |
| 27. | Dassault Aviation France | Policy point 1 refers to “interior furnishings.” This would need to be defined. Does that include drawers and cabinet door, which would not normally be left open, are easy to close, and would not be all open at the same time? The reference to “interior furnishings” in Point 1 does not match the reference to “cabin furnishing” in Point 3 and Point 5. Was it done intentionally?                                                                                                                                                                                                                                                                                                                                                                                                            | There was no intent to differentiate between “cabin” and “interior” furnishings. We revised the policy to refer to “interior furnishings.” With respect to items that encroach into the aisle transiently, these are also discussed in the context of the historical practice.                                                                                                                                                                                                                                       |
| 28. | Dassault Aviation France | Policy point 1 refers to “most adverse cabin configuration.” It is difficult to reach a common understanding of what is the most adverse configuration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | As noted previously, consideration of the most adverse condition is common practice for many certification findings, and doing so in this case should not involve any greater difficulties than other cases.<br><br>No change.                                                                                                                                                                                                                                                                                       |
| 29. | Gulfstream               | The last statement in section 1 of “Policy”<br><br>“Accessibility must be demonstrated to the FAA by test or analysis                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Considering the number variables involved, trying to specify a quantitative criteria as policy is not feasible. However, an applicant can make a proposal for their specific configurations.                                                                                                                                                                                                                                                                                                                         |

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Disposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |           | <p>supported by test data, or, in circumstances agreed to by the FAA, by inspection.”</p> <p>Gulfstream interprets that this statement to be very subjective. In addition, this sentence could be interpreted to require an Issue Paper to determine what inspection would be allowed. Otherwise this section means that the applicant must perform a test for every single floor plan. Accessibility should be evaluated and demonstrated the way it has been done in the past: by inspection via Cabin Interior Compliance evaluation with DERs/EARs delegated to perform this type of activity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>The policy does not intend that all configurations require physical demonstration, nor that an issue paper would be required. In fact, one of the purposes of a policy statement is to eliminate the need for project specific issues papers by generalizing the guidance. To make it clear, the policy is revised to state this.</p>                                                                                                                                                                                                                                                                                         |
| 30. | Boeing    | <p>Policy, 2</p> <p>This section could be interpreted to exclude aircraft that have an exit configuration with additional capability. An aircraft with an exit capability of 20 or more passengers can safely accommodate 19 or fewer passengers. It is unclear if the intent of this policy was to exclude larger aircraft. We recommend that this be rewritten to clarify that point.</p> <p>If the intent is actually to restrict aircraft with exit configurations providing additional exit capability, even though the type design is for 19 or fewer passengers, the we submit the following comment:</p> <p>Revise 2 to state:</p> <p>“2. The airplane’s maximum passenger capacity is restricted to 19 or fewer passengers by notation in the AFM and only 19 or fewer seats certified for taxi, take-off, and landing.”</p> <p>The policy as written will allow only the “executive service” jets manufactured by certain manufacturers to take advantage of this new policy. “Executive jets” manufactured by Boeing will still be required to maintain the dimensions required by 14 CFR § 25.815. This is because the basic Boeing “executive service” airplanes have at least 2 pairs of Type I exits. Therefore, the exit configuration</p> | <p>The proposal was intended to limit the allowance to smaller transport airplanes. However, as discussed above, the final policy is revised to simply limit the allowance to airplanes configured for 19 or fewer passengers regardless of the size of the airplane.</p> <p>It should be noted that the basic purpose of the policy is to make a distinction as to how the aisle width requirement is applied, based on operation. So, the argument that the rule applies the same across all airplanes is essentially rejecting the basic premise of the policy and how the rule has been applied historically. No change.</p> |

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter                                  | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Disposition                                                                                               |
|-----|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
|     |                                            | <p>does not limit the maximum passenger capacity to 19 or fewer passengers.</p> <p>This puts the Boeing airplanes at a competitive disadvantage with our competitors because it restricts the options for interior designs. Most of the Boeing 737 versions of “executive service” jets have 19 or fewer seats. The new policy punishes Boeing’s 19-seat airplanes in favor of other manufacturers, including non-US manufacturers. The policy clearly and unfairly differentiates between airplanes built by specific manufacturers. Currently, 14 CFR § 25.815 is applied across all models, regardless of manufacturer. We maintain that making such changes to the applicability of a regulation should be done via the normal rulemaking process.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                           |
| 31. | General Aviation Manufacturers Association | <p>Policy, 2, narrows the scope of applicability to aircraft with a maximum passenger capacity of 19 or less. The proposed language, which adds new criteria based on the number and operability of exits, is more complex and not consistent with the custom and practice which defined applicability by type certificated configuration of 19 or less. GAMA is concerned that this policy introduces a new approach to determining applicability by specifying variations in exit number and operability. This approach will be more difficult for an operator or airworthiness inspector to determine applicability and potentially lead to future inconsistencies of applying this policy.</p> <p>The proposed language, which adds new criteria based on the number and operability of exits, is more complex and not consistent with the custom and practice of applicability to business aircraft. Therefore GAMA requests the language of condition #2 be applicable to aircraft with a type certificated configuration of 19 or less and not used in part 121 operations.</p> <p>The level of safety afforded to each of the passengers is consistent regardless of the size of the airplane because the type of configuration is of a low density and the type of use is not</p> | As noted earlier, the policy is revised to apply to airplanes that are limited to 19 or fewer passengers. |

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### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter                   | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Disposition                                                                                                                                              |
|-----|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                             | scheduled air carrier service. It is very important that operators and inspectors in the field are able to easily identify and determine which aircraft are intended and configured in an “executive use” configuration which should be based on type certified seating configuration.                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                          |
| 32. | Airbus                      | <p>Page 5, Section “Policy” paragraph 2</p> <p>Airbus considers this paragraph obsolete, or in case it would be kept as proposed, interfering with SFAR 109.</p> <p>This paragraph is more restrictive than the SFAR 109, § 2 “Operations” and § 11 “Width of aisle.”</p> <p>In general, the interiors of large transport aircraft designed for private transportation should not be penalized compared to small transportation aircraft. The present draft policy exceeds the requirements of § 25.815 according to SFAR 109, which authorizes passenger capacity up to 60 passengers (including for § 25.815). While applying the FAA policy, this limit goes down to 19. Airbus recommends deleting this paragraph.</p> | As discussed previously, this policy does not apply to SFAR 109, which is a requirement unto itself.                                                     |
| 33. | Airbus Corporate Jet Centre | In the currently ongoing EASA rulemaking task RMT0264 on “Executive Interiors Requirements” (EIR), the approach is different. The deliberations in this group are ongoing at this time, and, thus, this comment does not necessarily reflect the final consensus.                                                                                                                                                                                                                                                                                                                                                                                                                                                          | We are aware of the EASA deliberations, which are not concluded yet. We conferred with EASA to ensure that this policy takes that activity into account. |
| 34. | Airbus Corporate Jet Centre | <p>Policy, 2</p> <p>There is no explanation on why aircraft with a TC designed for more than 19 passengers are explicitly excluded from aisle width reduction in non-TT&amp;L flight phases. It is unclear if arbitrarily excluding certain types of aircraft constitutes a new regulation.</p> <p>Similar to SFAR 109, the primary safety objective with respect to width of aisles in flight configuration is to enable crew members to rapidly react in emergency situations. The density of the cabin occupancy is a factor that increases the probability of having an</p>                                                                                                                                            | As noted earlier, the policy is revised to apply to airplanes that are limited to 19 or fewer passengers.                                                |

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter  | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Disposition                                                                                                                                                      |
|-----|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |            | <p>aisle crowded by passengers, belongings, or other items. It is therefore currently proposed that the aisles width reduction allowance applies to “low density” aircraft (the “low density” criteria being currently envisaged to be one third of the maximum approved passenger seating capacity indicated in a model’s type certificate data sheet”) in addition to airplanes with TC initially designed for 19 passengers or less.</p> <ul style="list-style-type: none"> <li>• Does condition 2 of the policy propose to exclude the low density airplanes initially designed for more than 19 passengers?</li> <li>• If the objective is to exclude standard air carriers operating under part 121 from aisle width reduction capability by design, would it be more appropriate to include a requirement in part 121 directly? (As this is done typically for the heat release/smoke density requirement included in part 121 for airplanes more than 19 passengers)</li> </ul> | <p>This policy applies to 14 CFR 25, and how it is implemented. 14 CFR 121 already requires compliance with 14 CFR 25, so no change to 14 CFR 121 is needed.</p> |
| 35. | Gulfstream | <p>Section 2 of “Policy”</p> <p>Regardless of the maximum capacity of an aircraft as originally defined by its TCDS, it should be permissible to modify an aircraft interior to limit its maximum passenger capacity to 19 or fewer (by inactive exits) since the level of safety afforded to the occupant should be no different than that of an aircraft which TCDS limited its passenger capacity to 19 or fewer.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>As noted earlier, the policy is revised to apply to airplanes that are limited to 19 or fewer passengers.</p>                                                 |
| 36. | Embraer    | <p>The proposed limitation in paragraph 2 raises a significant issue of a competitive level playing field and ties the eligibility of the policy to the configuration(s) of unrelated airplane models that happen to be certified under the same type certificate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>As noted earlier, the policy is revised to apply to airplanes that are limited to 19 or fewer passengers.</p>                                                 |
| 37. | Embraer    | <p>Technical Requirements for Demonstration of Compliance</p> <p>Paragraph 5 of the policy refers to the operation to return “cabin furnishing” to the TT&amp;L position and give as examples of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>As previously discussed, the policy is revised to address these types of features, which were not the primary subject of the policy.</p>                      |

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### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter                | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Disposition                                                                                                                                                                                                                                                                                                                                                                                               |
|-----|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                          | furnishings seats, tables, or dividers. The applicability of the policy should be limited to cabin features that can be deployed into a fixed position that encroaches into the aisle and not include things that are normally opened momentarily and then returned to their normal position like drawers or doors (e.g., galley/cabinet doors or lavatory access doors). It is apparent how these latter examples should be positioned and there is no need to use naïve subjects to demonstrate such obvious function. For similar reasons, a naïve subject evaluation of the placards (paragraph 3) associated with these simple and obvious features should not be necessary. |                                                                                                                                                                                                                                                                                                                                                                                                           |
| 38. | Dassault Aviation France | <p>Policy, 4 and 5</p> <p>The idea of naïve subject is always source of difficulties for business airplanes. Naïve to what extent? Therefore, Dassault Aviation and Dassault Falcon Jet suggest that the rule say “reasonably naïve considering the use of the aircraft, the type of passengers using it and the action required.”</p>                                                                                                                                                                                                                                                                                                                                            | <p>The intent of this provision is to have simple actions that a person who has to perform them for the first time can readily accomplish. Defining levels of naivety is unnecessary. Naïve subject testing is common, and should not be a significant source of standardization problems.</p> <p>However, we did revised the term to “naïve persons” to clarify that tests are not always necessary.</p> |
| 39. | Dassault Aviation France | <p>Policy, 4 and 5</p> <p>In a small cabin, passengers/crew can help passengers having difficulty. We suggest that points 4 and 5 should not be applicable to small airplanes (i.e., ≤ 19 passengers).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>While it may be true that other passengers, or potentially flightcrew can provide assistance, this is not something that can be mandated. Smaller airplanes should have inherently fewer obstacles and less distance to traverse, so this should be self-compensating. No change.</p>                                                                                                                  |
| 40. | Boeing                   | <p>Policy, 4</p> <p>We recommend revising the text as follows:</p> <p>4. The effectiveness and meaning of the placard discussed in 3 above, has been demonstrated to be understandable and easily viewed by naïve test subjects the intended occupants.”</p> <p>“Naïve test subject” implies to the compliance finder that they cannot review the placard for visibility by themselves and they must conduct special tests using naïve test subjects. Changing the text would allow part compliance to be found without conducting a special test. This, we propose replacement of “naïve test subjects”</p>                                                                      | <p>Agree that the use of the term “test subjects” implies tests must always be conducted. We revised this policy to use the term “naïve persons,” which permits an assessment by the person finding compliance without necessarily conducting tests.</p>                                                                                                                                                  |

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|     | Commenter  | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Disposition                                                                                                                                                                                                                                                           |
|-----|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |            | with “the intended occupants.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                       |
| 41. | Boeing     | <p>Policy, 4</p> <p>The referenced paragraph number is incorrect; it should be “3” rather than “4.”</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Corrected.                                                                                                                                                                                                                                                            |
| 42. | GAMA       | <p>Policy, 4</p> <p>Consistent with the requirement of § 21.21, that the applicant shall show compliance, GAMA requests consistent use within this policy to part 21 rather than the proposed language which uses demonstration. This will ensure that the policy remains consistent with the requirements of part 21 and reduces potential inconsistencies of acceptable methods of compliance. It’s more appropriate to use the term shown because there are various methods to show compliance and should not be limited only to demonstration.</p> <p>Therefore GAMA suggests the FAA reword the last sentence to read “the effectiveness and meaning of the placard discussed in 4 above, has been shown to be understandable and easily viewed....”</p> | As discussed previously, not all configurations will require actual demonstration. The policy is revised to clarify this.                                                                                                                                             |
| 43. | Gulfstream | Gulfstream requests the FAA revise section 4 of “Policy” to better call out the “in 4 above,” to “in Past Practices 4. ‘Efforts to Provide a Consistent Level of Safety in Air Carrier Aircraft’,” to reference to the correct paragraph.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Corrected.                                                                                                                                                                                                                                                            |
| 44. | Gulfstream | Sections 4 and 5 of “Policy” introduce testing with naïve participants. Anytime naïve participants are involved in testing, there needs to be pass/fail criteria established. Gulfstream requests whether it is expected that the applicant come up with the pass/fail criteria or if the FAA should provide guidelines. If the pass/fail criteria are left up to the applicant, then the chance for inconsistent application throughout the industry is highly likely.                                                                                                                                                                                                                                                                                       | We agree that pass/fail criteria are needed if naïve test subject demonstrations are required. In that case, just as in any certification substantiation, the applicant would propose how they intend to show compliance, which would include the pass/fail criteria. |
| 45. | Gulfstream | Clarify in section 4 of “Policy” what “demonstrated” means in the statement, “placard... has been demonstrated to be understandable and easily viewed by naïve test subjects.” Currently, the placards are evaluated during the cabin safety inspections, and if the meaning of “demonstrated” means that the placard remain                                                                                                                                                                                                                                                                                                                                                                                                                                  | As noted previously, we revised the policy to clarify that actual demonstration by test is not required for each configuration.                                                                                                                                       |

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### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter                         | Requested Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Disposition                                                                                                                                                                                                                                                                                                                                                |
|-----|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                   | available, then FAA should clarify this. Gulfstream fears this may grow into an evaluation that includes actual naïve test subjects for every floor plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                            |
| 46. | Embraer                           | The policy should provide guidance on the levels of familiarity and time and/or number of attempts permitted in the naïve subject tests that are appropriate for these features.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | See comment 38.                                                                                                                                                                                                                                                                                                                                            |
| 47. | Dassault Aviation France          | Policy point 5: if a seat needs to be moved back to its TT&L position, it is because it was previously moved to its non-TT&L position, therefore the subject already has some knowledge of the seat operation.                                                                                                                                                                                                                                                                                                                                                                                                                                                               | See comment 38.                                                                                                                                                                                                                                                                                                                                            |
| 48. | Gulfstream                        | Similarly in section 5 of “Policy,” the operation to return the cabin furnishings to their proper TT&L positions should remain the responsibility of the EAR making the interior compliance evaluation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | See comment 45.<br><br>We revised the policy to clarify that actual demonstration by test is not required for each configuration.                                                                                                                                                                                                                          |
| 49. | Gulfstream                        | Effect of Policy<br><br>“In addition, as with all guidance material, this policy statement identifies one means, but not the only means, of compliance” might imply that there is no other choice, such as “must” or “has been.” Some ACOs interpret this statement as “there is no other way.”                                                                                                                                                                                                                                                                                                                                                                              | This is standard policy statement language and the meaning is as stated.<br><br>No change.                                                                                                                                                                                                                                                                 |
| 50. | Tom Knott, DER Neenah, WI         | Implementation<br><br>TC, Amended TC, STC and Amended STC programs are listed. In addition, this policy would be applicable to compliance findings in support of major alterations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Agree. We revised the policy to include major alterations.                                                                                                                                                                                                                                                                                                 |
| 51. | Brad Christensen C&D Zodiac, Inc. | The first sentence in the conclusion states that compliance with the dimensions of § 25.815 is required for all phases of flight for part 121 operation. We are concerned that this could be interpreted as not allowing any doors to even momentarily deploy into the required aisles if they reduce the aisle width below the minimum. The wording “...required for all phases of flight...” may be interpreted as “...required at all times during all phases of flight...” without further clarification regarding doors, drawers, and tables on certain cabin components that traditionally have been allowed to reduce aisle widths when in use by crew or passengers. | See comment 2.<br><br>We revised the policy to clarify that it does not apply to features such as lavatory doors, or armrest caps, or stowage compartment doors that might encroach into the aisle when open. We also revised the policy to clarify that this policy applies during critical phases of flight (but not during taxi, takeoff, and landing). |
| 52. | Contour                           | For part 121 airplanes, we suggest allowing the simple deployable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | See comment 2.                                                                                                                                                                                                                                                                                                                                             |

## Disposition for Public Comments

### Policy PS-ANM-25.815-01, Compliance with the Aisle Width Requirements of § 25.815

|     | Commenter                                                           | Requested Change                                                                                                                                                                                                                                                                                                                                                                          | Disposition                                                                                                                                                                                                                                    |
|-----|---------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | Aerospace, Sicma<br>Aeroseat, Weber<br>Aircraft and<br>Zodiac Seats | items commonly used on seats (e.g., food tables, hinged armcaps, handicap armrest, deployable video screens, corded devices) using 3, 4, and 5 listed in the policy section with an additional requirement of no more than 10 to 35 lbs of effort to push the encroaching item out of the way to restore the aisle width to its minimum requirement during non-critical phases of flight. | We revised the policy to clarify that it does not apply to features such as lavatory doors, or armrest caps, or stowage compartment doors that might encroach into the aisle when open.                                                        |
| 53. | Tom Knott, DER<br>Neenah, WI                                        | In Table A-1, under “should,” it says “Alternative MOC has to be approved by issue paper.” The issue paper process is quite intensive. A more practical approach might read “Alternative MOC could require approval by issue paper.” This suggested wording would be more in line with the “Effect of Policy” section on page 6.                                                          | This is standard policy statement language for the case where a proposed MOC is <i>outside</i> the policy. For the case where an MOC is consistent with, but not identical to, the policy, an issue paper may not be needed.<br><br>No change. |