

<b>DISPOSITION OF PUBLIC COMMENTS ON PROPOSED POLICY STATEMENT ANM-115-09-XXX, INTERACTION OF INTERIOR STRUCTURES, INCLUDING SEATS</b>			
<b>Commenter</b>	<b>Comment</b>	<b>Requested Change</b>	<b>Disposition</b>
<b>1. Boeing</b>	<p>The proposed policy statement should specify that flexible close-out seals need not be accounted for when determining load share.</p> <p>The proposed policy statement does not provide guidance for flexible close-out seals between structures. Such gap-filling close-out seals are designed to compress easily and do little to influence load share.</p>	<p>Boeing proposed the following revisions:</p> <p><i>“Flexible close-out seals need not be included when determining load share as these items compress when loaded.”</i></p>	<p>We agree that most closeout seals have low stiffness and are readily compressible and do not transfer load. In that sense, the seals are similar to the local compression in a seatback. However, closeout seals can transfer load once they compress and the applicant should show that this will not occur. We added the following sentence to the policy statement “Closeout seals between interior structures need not be considered as a load path, if the applicant shows the closeout seats are readily compressible and essentially do not transfer load.”</p>

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2. Boeing	<p>The text of this proposed section states:</p> <p><i>“Because seats tend to have a significant amount of deflection under static and dynamic conditions, there is the potential for seats to contact and impose loads on other seats and interior structure.”</i></p> <p>The term “seats” should be clarified within the policy to ensure clear applicability to all types of seats and ensure appropriate compliance.</p>	<p>Boeing requested that the FAA clarify the guidance to indicate its applicability to various seat types. Boeing provided the following revisions:</p> <p>“Because seats (<b>for example, passenger, crew rest, attendant and attendant partitions</b>) tend to have a significant amount of deflection under static and dynamic conditions, there is the potential for seats to contact and impose loads on other seats and interior structure.”</p>	We agree with the comment and have revised this policy statement to include the types of seats affected by this policy statement.

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<p><b>3. Boeing</b></p>	<p>The text of this proposed section states:</p> <p><i>“Adding 50% of the applied load (the load factor from § 25.561 times the weight of the component) from the aft structure to the loads of the forward structure is an acceptable method of compliance.”</i></p> <p>Boeing requests that the FAA provide additional means of compliance, in addition to the guidance already cited in the policy memo.</p> <p>The proposed policy memo does not include the option to calculate the load in the case where the load applied on the forward structure is less conservative than 50% of the total load from the aft structure. Boeing recommends that the FAA include a statement that permits the use of computer modeling (such as finite element analysis) when calculating the applied load from the aft structure, in lieu of testing. Boeing also requests that the FAA allow for testing of actual load sharing commodities as an acceptable means of compliance.</p>	<p>Boeing suggested that the text be revised as follows:</p> <p><i>“Adding 50% of the applied load (the load factor from §25.561 times the weight of the component) from the aft structure to the loads of the forward structure is an acceptable method of compliance. <u>It is also permissible to calculate the applied load from the aft structure, using computational means, such as Finite Element Modeling, in lieu of testing. An additional equivalent means of compliance can be found by allowing testing of the actual load sharing commodities.</u>”</i></p>	<p>Although the intent of this policy statement is to provide a simple criterion, it is acceptable for applicants to perform more extensive analysis, or perform actual testing of the combined units. We have revised the policy statement to include computational means as an option.</p>

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<b>4. Boeing</b>	<p>This section states:</p> <p><i>“Situation 2 can occur from a seat contacting and loading a structure, or a structure contacting and loading a seat. In this situation, the only load cases relevant from a certification standpoint are the static load factors. Since only seats are affected by § 25.562, the deflections caused by the § 25.562 test conditions do not apply when determining the effect on other types of structure. Therefore, this situation can be handled the same as situation 1, and the same criteria apply. . . .”</i></p> <p>Boeing suggests that the FAA provide further guidance on the interaction between interior structure and a seat. . . .</p> <p>Boeing requests that the FAA include guidance for the deflection of both the forward and aft structure in the static condition. It is to be expected that the load experienced by one component would also be experienced by the other component. Therefore, interference should be assessed considering the deflections of both components. This would allow the aft item to deflect into space given up by the deflection of the forward item.</p>	<p>Boeing suggested that the text be revised as follows:</p> <p><i>“Situation 2 can occur from a seat contacting and loading a structure, or a structure contacting and loading a seat. In this situation, the only load cases relevant from a certification standpoint are the static load factors. Since only seats are affected by § 25.562, the deflections caused by the § 25.562 test conditions do not apply when determining the effect on other types of structure. Therefore, this situation can be handled the same as situation 1, and the same criteria apply. <b><u>Interference between two components shall be assessed by comparing the two components under deflection.</u></b></i></p>	<p>We agree that this is consistent with the other cases. However, we revised the policy statement by adding the clarification to situation 1 because that is the baseline case and case 2 essentially replicates it.</p>

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<b>5. Boeing</b>	<p>This section states:</p> <p><i>“ . . . Deflections resulting in 1" or less interference by the seatback of an aft facing seat do not require assessment because this amount of deflection can be accommodated with local compression of the seatback . . . ”</i></p> <p>Boeing suggests that the criteria provided in this section should not be exclusive to "the seat back of an aft facing seat", but that the same criteria should apply to a forward facing seat as well.</p> <p>The direction of the seat has no impact on the seatback’s local compression. This should be clarified in the final policy statement.</p>	<p>Boeing recommended that the text be revised as follows:</p> <p><i>“ . . . Deflections resulting in 1" or less interference by the seatback <del>of an aft facing seat</del> do not require assessment because this amount of deflection can be accommodated with local compression of the seatback. . . . ”</i></p>	<p>We agree the criteria would be valid in theory, but the actual applicability seems remote. The more likely case is a side-facing seat, and it is not clear that there is a lateral 1" of compression/deflection available in that case. A forward facing seat would have to deflect a significant amount to create this situation, and the occupant would be between the seatback and the forward structure in the actual case. However, in the case of deflection of other structure into the seatback of a forward facing seat, the situation is effectively the same as the one noted. We have revised the policy statement to address deflection of other structure into the seatback of a forward facing seat.</p>

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<p><b>6. Boeing</b></p>	<p>This section states:</p> <p><i>“When showing compliance with § 25.301, considering the requirements of § 25.562, it is likely that a test incorporating both seats will be necessary if the amount of interference is significant. In this case, interference is significant if the dynamic deflection of the seat imparting load is more than 1” into the envelope of the seat being loaded, or the point of interference is with two rigid elements (for example, tube to tube or tube to spreader). Include the dynamic deflections of the seat being loaded when determining whether there is interference.”</i></p> <p>Clear and common steps do not exist for how to measure dynamic deflection and a method/s for measuring dynamic deflection should be addressed in this policy statement. The proposed policy is unclear as to whether the method of measuring interference is maximum deflection or phased-time analysis, in which deflection is measured and compared millisecond-by- millisecond. Boeing recommends that the FAA allow the use of maximum deflection to measure interference. Measuring and comparing</p>	<p>Boeing requested that the FAA clarify the method for analyzing deflection.</p> <p>Boeing recommended that the text be revised as follows:</p> <p><i>“When showing compliance with § 25.301, considering the requirements of § 25.562, it is likely that a test incorporating both seats will be necessary if the amount of interference is significant. In this case, interference is significant if the dynamic deflection of the seat imparting load is more than 1” into the envelope of the seat being loaded, or the point of interference is with two rigid elements (for example, tube to tube or tube to spreader). Include the dynamic deflections of the seat being loaded when determining whether there is interference. <b><u>Dynamic deflection shall be assessed by measuring the maximum deflection of a component when determining interference.</u></b>”</i></p>	<p>We agree that using the maximum deflection is acceptable and have revised the policy statement to include this information. However, the policy statement will also note that the deflections at the point of contact are those of interest.</p>

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	dynamic deflection through phased-time analysis, millisecond-by-millisecond, is a complex process and can create the potential for errors. We maintain that measuring and comparing maximum dynamic deflection can be assessed relatively easily and will provide the intended level of safety desired.		
<b>7. Boeing</b>	<p>The cited wording in this policy memo could cause confusion for airplanes subject to 14 CFR 121.311 where § 25.562 is not part of the airplane model certification basis, but the manufacturer is voluntarily adding § 25.562 to the specific airplanes’ certification plans. Boeing requests clarification for this case. This section states:</p> <p><i>“This policy also assumes that § 25.562 is part of the certification basis for the airplane. If § 25.562 is not part of the certification basis, then that portion of the policy is not applicable.”</i></p>	<p>Boeing requested further clarification of these statements and proposed the following revision for consideration:</p> <p><i>“This policy also assumes that § 25.562 is part of the certification basis for the airplane <u>or that §25.562 has been voluntarily added to the certification plan for the specific airplane.</u> If §25.562 is not part of the certification basis, <u>or has not been voluntarily added to the certification plan for the specific airplane,</u> then that portion of the policy is not applicable.”</i></p>	<p>We partially agree with the comment. Compliance requirements for § 25.562 either apply or they do not. Whether the operator must show compliance or the manufacturer must show compliance does not affect the policy. However, we revised the policy statement to clarify that compliance with § 121.311 may require compliance with § 25.562, even though it is not part of the type certification basis.</p>

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<b>8. B/E Aerospace</b>	<p>Page 2, Situation 2 (Seat loading a structure) contains a statement explaining how to conduct static evaluation of adjacent components and allows a 1" interference between structures... do not require assessment because this amount of deflection can be accommodated with local compression of the seatback.” However, on page 3, Situation 3, (Seat to Seat) two methods are presented to determine “significant interference on a seat to seat installation. One method allows for a 1" interference of the seat “envelope”.</p>	<p>B/E Aerospace provided the following suggestions:</p> <p>a) Two references to 1" interference (one from Static evaluation, one from creating dynamic envelope) in adjacent paragraphs are easy to confuse. Could these written with 1" static interference or 1" dynamic envelope interference?</p> <p>b) Could you include a definition of the how a seat envelope is measured? Data collected from dynamic testing from the edges of soft upholstery or structural members? Headrest at maximum extension or at the correct height for a 50% ATD? Can the data be collected in other ways besides dynamic testing?</p>	<p>a) We revised the policy statement to clarify that situation 3 addresses dynamic deflection’ and situation 2 addresses static deflection.</p> <p>b) We did not intend to introduce a new definition of “envelope”. We revised the policy to clarify this issue. In terms of gathering the data, an applicant can propose a method that does not involve dynamic testing to define the envelope.</p>

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<b>9. B/E Aerospace</b>	The second method to determine “significant interference” is measured at structural members and does not allow for 1" interference.	<p>B/E Aerospace provided the following suggestion:</p> <p>Could you add a clarifying statement that would help explain the reason for allowing 1" interference on the first alternative but not the second: i.e., 1" interference to account for soft upholstery, or this amount of deflection can be accommodated with local compression of the seatback, or the dynamic loading on the target seat causes it to move away from the striking seat by a minimum of 1" and no contact is predicted, etc.</p>	The 1" allowance is specific to the seatback. The rationale is included in the first alternative. In the second situation, the load will simply transfer and is not mitigated by local deflections. No changes have been made to the policy statement.
<b>10. B/E Aerospace</b>	Page 3, Situation 3: (Seat to Seat): The second alternative is so straightforward “point of interference with two rigid elements” that there doesn't seem to be a need for the first "1" interference" option. Could the 1" interference option be deleted for seat to seat?	B/E Aerospace requested that the second alternative be deleted.	While it may seem straightforward, given the allowance for compressible features, we are retaining the second alternative to ensure a general understanding. No changes have been made to the policy statement.

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<b>11. B/E Aerospace</b>	Page 2 Situation 2. (Seat loading a structure) 50% of static load share from adjacent seat might be overly conservative. For a seat back to cabinet (attachment 2, Figure 1, the CG of the seat is significantly below the tip of the seat back, however the full 50% of total static load (1500 lbs) applied at approx. 40" above the floor. This would result in significant increase in structural strength and weight of cabinetry. Not sure how interior panel partition adjacent to seat could comply with this requirement.	Propose a load share that accounts for the CG of the seat and occupant with respect to the location of applied load. Could there be a value of less than 50% load share considered for a particular installation?	We agree that it is possible, but it would be required on a case-by-case assessment. The policy statement provides a simple way to substantiate, but an applicant can propose an alternative with appropriate rationale. We revised the policy statement to explicitly state this option.
<b>12. B/E Aerospace</b>	Page 3, Situation 3: (Seat to Seat) The interaction of the seats requires dynamic testing to assess the structural adequacy of the seats to the requirements of § 25.562.	Section 25.562 (b)(3) and SAE Aerospace Standard Performance Standard AS8049/B titled <i>Seats in Civil Rotorcraft, Transport Aircraft, and General Aviation Aircraft</i> , paragraph 5.3.1.3, requires the simulation of the aircraft floor warpage by deforming the test fixture (pitch and roll). Could you add a clarifying statement stating whether the intent of the memo is to test the seats with floor deformation per SAE Aerospace Standard AS8049A 5.3.1.3?	We agree that the policy statement should address testing the seats with simulated floor distortion. We revised the policy statement to include a discussion of floor distortion.

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<b>13. B/E Aerospace</b>	Page 3: third paragraph, “Dissimilar components” - The paragraph describes the testing of an Aft facing double seat behind a Forward facing Single seat. The assumption is both seats have been previously qualified to the dynamic loading conditions of § 25.562, and be tested to dynamic conditions.	<p>a) Recommend change to Illustration Attachment 2, Figure 4, to include an Aft facing double seat behind a Forward facing Single seat as stated in the paragraph, with a text box from Attachment 2, Figure 3 "dynamic test likely".</p> <p>b) Change "Dissimilar components" to "Dissimilar seats"?</p>	It is not our intent that Figure 4 address every scenario and the discussion is not limited to just different seats. The case illustrated in Figure 4.b. has been added to the discussion in this policy statement.

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<b>14. B/E Aerospace</b>	<p>Page 3, third paragraph is following a “seat to seat” chronology, however, Attachment 2, Figure 4, which shows a box shaped "Small Cabinet". A cabinet is qualified to static conditions of § 25.561. This was a little confusing on first. If the inference of the dissimilar components section WAS to test the seat and cabinet to § 25.562 requirements, then we disagree.</p>	<p>Two recommendations:</p> <p>a) Place this discussion earlier in the test by Situation 2 (Seat loading a structure).</p> <p>b) The illustration should contain to text box from Attachment 2, Figure 2. “Loads from § 25.561.”</p> <p>Our experience shows that the cabinet would either:</p> <p>1) tear free from the dynamic sled sometime after 9g acceleration but before meeting the full 16g peak load, and there is no load share, or</p> <p>2) the cabinet might remain attached to the sled up to 16g, but any additional load share from the adjacent seat would cause to overstressed static attachments to break free before any significant load share between the adjacent structures occurred.</p>	<p>This paragraph is not part of Situation 3, although it literally follows it in the policy statement. We revised the policy statement to clarify that it applies in general.</p> <p>The § 25.562 loads do not apply in this case. There is no reason to revise the policy statement.</p>

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<b>15. B/E Aerospace</b>	The policy statement does not include references to head injury criteria (HIC) testing.	For clarity include a statement that his policy addresses the seat to seat and seat to structural qualification of interior only and HIC testing must also be included for interior compliance.	We have revised the policy statement to clarify that although HIC is not discussed it is still required for installation approval.
<b>16. Cessna</b>	For the past 20 years, since the dynamic requirements were added to the regulations, industry has shown compliance for Interaction of Interior structures by the means that is documented in this FAA policy statement except for the requirement of load interaction between seats and between seats and other interior structures for dynamic loads of 14 CFR 25.562. It has been a long standing regulatory interpretation and practice that interaction between interior structures only considers static loading and not dynamic loading of 14 CFR 25.562.	No specific changes.	<p>We agree with the comment regarding interaction of seats with other structure. This is explicitly covered in situation 2 and only static substantiation is required. In fact, one reason for this policy statement is to reiterate that dynamic substantiation is <b>not</b> required for this case.</p> <p>However, with respect to interaction of seats with other seats, Cessna’s interpretation is not correct. The regulations require consideration of the regulations applicable to seats-- which include § 25.562. The intent of the policy statement is to provide acceptable means of compliance with the regulations as well as to reiterate the regulatory basis.</p>

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<b>17. Cessna</b>	Testing every possible configuration where the seat structure would come into contact with another Interior structure or another seat would cause an enormous amount of additional required dynamic tests to certify all the possible interior arrangements that customers could order. This would be a huge cost addition to an already expensive dynamic certification program for seats.	No specific changes.	As noted above, this policy statement is consistent with Cessna's position regarding interaction of seats with other structure. In addition, this policy statement does not require testing of all possible configurations. However, it does specify those situations that need to be substantiated in order to show compliance with the regulations.
<b>18. Cessna</b>	The wording in this policy statement of having to consider all interaction of seats to seats, and seats to interior structures, would substantially increase the number of required dynamic tests that will have to be completed to certify the seat structure for several different interior configurations. Furthermore, this newly developed policy invalidates methods at compliance that have been accepted by FAA offices across the country, on products from nearly all business aircraft manufacturers, hundreds of times.	No specific changes.	Although the commenter contends the guidance in this policy statement is contrary to past practice, no other commenter made this assertion, either from within FAA or industry. Thus it may be that Cessna has misinterpreted the requirements up to now, which suggests the policy statement is needed.

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<b>19. Embraer</b>	Use of ultimate loads seems excessive since they are outside the flight envelope, and already include a safety margin.	Make reference only to limit loads.	The loads in question are defined as ultimate loads, so there is no corresponding limit load. The requirement in § 25.305 is to account for ultimate loads. No change was made to this policy statement.
<b>20. GAMA</b>	In several locations the FAA makes note that only seats must undergo dynamic certification. There are areas throughout the policy where one could be lead to believe that the agency intends for an applicant to perform dynamic certification on items other than a seat. As policy is issued to clarify existing regulation, statements such as “Even though the regulations do not require assessment of dynamic deflections and resulting interactions between seats and other components, we recommend that applicants assess this situation to confirm that no catastrophic failures would occur” are not appropriate in policy, they may be appropriate statements in another context such as in a standard practice document. One could be lead to believe that a seat touches a cabinet which touches a seat which touches a divider which touches a divan, etc. and be driven to do an entire	While it is clear that the FAA has written this policy with the mindset that dynamic testing only applies to seats, there are several instances where the policy subtly increases the requirement beyond that and GAMA believes the FAA should be mindful to assure such language does not exist in this policy.	As defined in Attachment 2 to this policy statement, the nomenclature for a recommendation is to enclose it in square brackets. A recommendation is neither a requirement nor guidance, but something the FAA believes is appropriate to consider. Since the policy statement process specifically provides for recommendations, and since this is something the FAA recommends, this policy statement has not been revised in response to this comment.  As co-chair of the seat streamlining effort, GAMA helped develop this new approach to policy statements.

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	airplane dynamic test which would be clearly outside of the scope of the regulations.		

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<b>21. GAMA</b>	It is clear that the assessments being addressed in this policy pertain only to structural evaluation and not to Head Injury Criteria (HIC) evaluation however the dynamic methods being utilized are very similar.	To assure that the analysis and alleviations provided in the policy are not translated to HIC analysis GAMA suggested the FAA include a statement in the front of the policy which states it only applies to structural analysis aspects and not to HIC analysis in anyway.	B/E provided a similar comment and, as noted above, this policy statement has been revised to add a statement that compliance with injury criteria is still required.
<b>22. GAMA</b>	<b>Page 2, Policy Section, 4th Paragraph -</b> This paragraph describing “Situation 2” explains how to perform a static evaluation for interference between a seat and a non-seat object. A threshold of 1” of static deflection is being provided as to when analysis must be performed and when no analysis is necessary. Later in the dynamic analysis case, a 1” dynamic deflection threshold is being used to determine when analysis must be performed. GAMA requests the FAA clarify that the 1” interference being referenced in this case is a 1” static interference to eliminate confusion as to the methods.	GAMA requested the FAA clarify that the 1” interference being referenced in this case is a 1” static interference to eliminate confusion as to the methods.	Situation 2 is stated as focusing on the static load requirements of § 25.561. However, the word “static” has been added to the sentence discussing deflections. It should also be noted that the need for an analysis starts with determining the deflections. The need to <i>substantiate</i> the effect of those deflections is what is covered by the policy.

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<p><b>23. GAMA</b></p>	<p>Page 3, Policy Section, 1st paragraph – This paragraph describing “Situation 3” explains how to perform a dynamic evaluation of seat to seat interaction. The 1"dynamic threshold for determining when analysis must be performed includes the caveat that if rigid structure would make contact within that 1" of deflection, an analysis must be performed. There has been significant confusion as to whether that is or is not what is being stated in this paragraph. Part of the confusion seems to stem from the identification of rigid structure versus non-rigid structure. GAMA believes the FAA intends to express that rigid structure includes the structural members such as metal frames and tubes while non-rigid structure includes the foam, covering materials and accessories which make-up the remainder of the seat.</p>	<p>GAMA suggested that the FAA clarify this section to eliminate any ambiguity.</p>	<p>We agree with GAMA’s interpretation that a 1" allowance does not exist when there is contact between rigid elements. We have revised this policy statement to clarify that there is no 1" allowance.</p>

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<b>24. GAMA</b>	Page 3, Policy Section, 2nd Paragraph - The interaction of the seats requires dynamically testing to asses to structural adequacy of the seats to the requirements of § 25.562. Section 25.562(b)(3) and SAE AS8049/B, Para 5.3.1.3 require the simulation of the aircraft floor warp by deforming the test fixture (pitch and roll).	GAMA suggested that the FAA provide clarification as to whether the intent of the memo is to test the seats with floor deformation per AS8049A. 5.3.1.3.	We agree that the policy statement should be revised to clarify that the seats should be tested with floor deformation. Another commenter also made this request. We revised the policy statement to include a discussion of floor distortion.
<b>25. Goodrich</b>	Not all the figures have a reference in the text of the policy.	Goodrich suggested that the policy statement should call out each figure in the text.	We agree that each figure should be referenced in the body of the policy statement and have revised the document accordingly.
<b>26. Goodrich</b>	On page 2, for the discussion of Situation 2: It would be good to clarify this paragraph to indicate that the static deformation of both structures may be used to determine the amount of interference.	Goodrich suggested the following revision:  State that deflection of both articles can be considered when determining interference.	We agree that the deflection of both articles can be considered when determining interference. Boeing made the same comment. However, Situation 1 is the baseline case, and that is where we added the statement. Since Situation 2 states that the same criteria from Situation 1 can be applied there as well, the added text covers both situations.

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<b>27. Gulfstream</b>	<p>Page 2, Situation 1 - Interaction between interior structures other than seats. This situation indicates that adding 50% of the applied load from the aft structure to the loads of the forward structure is an acceptable method of compliance. Gulfstream offers that this policy needs to be clear whether it must be assumed that each of the structures, at the point of contact, are able to react to their own loads assuming there is no interaction first.</p>	<p>The policy needs to be clear that if there is good rationale an applicant may need to consider more or less than a 50% load transfer. If no other rationale exists, then 50% would be an acceptable assumption.</p>	<p>Regarding using something other than the 50% additional load, we generally agree; see Boeing comment #3. With respect to each structure being able to react its own load prior to contact, this is a prerequisite for compliance. Were that not the case, the installation of one component would be dependent on the installation of the other component, and would become an installation limitation. However, the policy statement has been revised to include this assumption.</p>
<b>28. Gulfstream</b>	<p>Page 2, Situation 2 - Interaction between interior structures and seats. Gulfstream requests clarification. Seat backs typically deform in all three planes either by straight line deformation or by twisting. Since seat deformation is rarely on an x-axis or y-axis, assuming that the seat back twists, does an applicant just consider the first point of contact or do we pick the median of the seat back? For example, does the 1" criteria apply over the entire width or should an average be taken, or are there some other criteria?</p>	<p>Clarify at what point the maximum deflection is established.</p>	<p>Our intent is to address the maximum point of deflection in the direction of the adjacent structure, under the load cases of interest. We revised this policy statement to reference the maximum deflection.</p>

<b>DISPOSITION OF PUBLIC COMMENTS ON PROPOSED POLICY STATEMENT ANM-115-09-XXX, INTERACTION OF INTERIOR STRUCTURES, INCLUDING SEATS</b>			
<b>Commenter</b>	<b>Comment</b>	<b>Requested Change</b>	<b>Disposition</b>
<b>29. Gulfstream</b>	<p>Page 3, first paragraph statement in brackets. [Even though the regulations do not require assessment of dynamic deflections and resulting interactions between seats and other components, we recommend that applicants assess this situation to confirm that no catastrophic failures would occur].</p> <p>Gulfstream offers that although this is good point to bring up, if there is no regulation to support the statement then it does not belong in a policy memo that is just intended to clarify the existing regulations.</p>	Remove statement in brackets.	As noted in Attachment 2 of this policy statement, items in brackets are only recommendations, which, by definition, are not required, and not linked to formal guidance. No changes were made to this policy statement in response to this comment.
<b>30. Gulfstream</b>	<p>Page 3, third paragraph and Attachment 2 Figure 4. This section indicates that “there are situations where contact between two components can introduce a new load path, or load case, into the component imparting load.”</p> <p>Gulfstream offers that this policy needs to be very clear what load case is being considered, i.e. §25.561 or §25.562. By looking at the figure it is interpreted that only the load case for a §25.561 event need be considered. As the static structure would not be “present” unless it is part of the restraint system for a §25.562 event.</p>	State the load case being considered in the figures.	The figures in this policy statement simply illustrate the guidance in the text; they do not create requirements. The text is very explicit regarding the applicability of the different load cases to different types of interior structure. Nonetheless, Figures 1-3 in the policy statement do contain the load case reference in the title, so we revised Figure 4 to also include the load case reference in the title.

<b>DISPOSITION OF PUBLIC COMMENTS ON PROPOSED POLICY STATEMENT ANM-115-09-XXX, INTERACTION OF INTERIOR STRUCTURES, INCLUDING SEATS</b>			
<b>Commenter</b>	<b>Comment</b>	<b>Requested Change</b>	<b>Disposition</b>
<b>31. Gulfstream</b>	Page 8, figure 2; indicates, “Applied load to seat = Loads from §25.561 for Seat + 50% loads from §25.561 from closet.” Gulfstream offers that 50% of a closet load seems excessive. Is this an appropriate percentage?	No specific suggestion.	The “50%” criterion is a simple and relatively common practice and is considered acceptable. However, we added additional options for applicants that want to develop more sophisticated assessments of the actual load transfer.
<b>32. Gulfstream</b>	General Comment - in the figures provided as attachments it is important that items are appropriately labeled. i.e., state that they are structure (which may or may not be closets).	Label all items in figures.	We agree that the items should be labeled. However, the figures are highly generic, so the depiction was not meant to represent specific articles. We revised the policy statement by labeling the articles in the figures, except for some of the articles (such as seats) that are obvious.