

Response to FAA SNPRM Notice 02-17 Docket FAA-2002-13464
Improved Seats in Air Carrier Transport Category Airplanes

Summary: Although this is a FAR 121 proposal, which has no direct regulatory effect on Australian operators, the implications are that similar rulemaking would be conducted by the Australian Civil Aviation Safety Authority (CASA) for Australian operators. The proposal for all large aircraft used for regular public transport operations to be equipped with passenger and cabin crew seats meeting the dynamic performance standards (FAR 25.562) is supported.

Comment:

Although FAR 25.562 was introduced at Amendment 25-64 in 1988, the proportion of the world airline fleet which complies with the improved occupant seat standard is small and previously certificated aircraft will be in airline service for many more years. The certification basis for aircraft such as the Boeing 737-700/800 and Airbus 330 and A340 includes partial compliance but, in most cases, head impact and femur injury criteria are not required. Incapacitating injuries, particularly to cabin crew or passengers seated at critical locations, can result in additional fatalities due to the inability or delay to escape. The proposal would require that all applicable aircraft, within 14 years, fully comply with FAR 25.562.

The improvement in occupant survivability afforded by the improved seat standards of FAR 25.562 should be available in all large aircraft in regular public transport operations as soon as is feasible. The SNPRM is supported.

Experience in Australia has been that when the carrier refurbishes the cabin, the passenger seats have been replaced with "16g seats". However, since the certification basis either does not include FAR 25.562 or only partial compliance with 25.562, the installation into the airframe does not address the head strike or femur injury criteria. Under the SNPRM, these issues would need to be addressed and would probably require some dynamic tests to show full compliance. With aircraft types still in production, compliance will need to be shown within 4 years and would probably be conducted by the airframe and seat manufacturers. For out of production aircraft, the carriers would be responsible for showing compliance within the 14 years, by which time many of these aircraft types would probably have been retired from mainline airline service.

The complication of an acceptable compliance criteria is eliminated by specifying full compliance in all cases. Given the extended compliance time of 14 years, the burden of compliance by operators would be reasonable and manageable. The SNPRM is supported.

In an emergency, the cabin crew play a vital role in maximising passenger post-crash survivability in selection and operation of emergency exits, directing and assisting efficient evacuation and decisions on contingency plans in particular situations. As such, it is essential that cabin crew are afforded the best crash protection against incapacitating injuries which would prevent them from performing this role.

The application of improvement to cabin crew seating given in this SNPRM is supported.