February 28、2003

Docket Management System
Docket No. FAA-2002-13464
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, S.W.
Washington, D.C. 20590-0001
Fax No. 1-202-493-2251

Subject: Comment - SNPRM " Improved Seats in Air Carrier Transport Category Airplanes," Docket FAA-2002-13464, Notice No.02-17 (67 FR 62294, October 4, 2002)

Dear Sirs,

On behalf of ATASCO CSWG (Aviation Technical And Safety Committee Cabin Safety Working Group) which consists of seven airlines in Japan, we would like to submit comments on the subject SNPRM. Our comments are as follows;

・Change "16G Compatible Seat" to " Compliance with Section 25.562"

Compliance with Section 25.562 will require cabin interior monument potential re-design, certification activities and configuration change (loss of entire seat row) for seat installation in addition to certification for seat itself.

The workload of the FAA and other authorities will be increased as well as every airline. Even if the FAA plans to reduce the time and cost of seat certification programs by as much as 50 percent, we guess that the workload of every authority will be radically increased beyond the FAA estimation by changing from "16G Compatible Seat" to " Compliance with Section 25.562".

・Passenger seat

To make the seats comply with Section 25.562, the new seats in almost airplanes can not be installed at the same locations without revising seat arrangement. The dimension between the front row seats and any cabin monument in front of the front row seats would have to be increased to meet the HIC requirement. The FAA did not count the cost for the cabin layout modification, certification and especially resulting in decrease of the number of passenger seats.

And also we are afraid that the airplane seat tracks could not withstand the loads imposed by the 16g seats. But the FAA explains in the SNPRM that modifications to the floor would not be required. We would like the FAA to investigate and understand that almost airplane models do not have so strong seat tracks as 777 airplanes.

・Flight attendant seat

The cost analysis for flight attendant seats is performed, assuming that they are rarely replaced. We believe that every authority requires that the attachment of the wall, where wall-mounted seat is attached, can withstand the loads imposed by the 16G seat.
We do not believe that this would not be required by any authority because the seat would detach from the wall resulting in lowering the survivability of flight attendant if the wall is not be strengthened. We can say the same thing about the floor-mounted flight attendant seat. Consequently, a huge sum of cost would be required to make flight attendant seats comply with Section 25.562. We would like the FAA to exclude flight attendant seats from the final rule.

・Service life of seats

In Japan, almost passenger seats will not be periodically replaced nor have such a concept as service life as well as flight attendant seats. Airlines in Japan will have 94,860 of passenger seats and 3,620 of flight attendant seats to be complied with Section 25.562, and have a big cost impact of US $ 359.5 million in case that the SNPRM becomes a final rule.

・ Cost-Benefit Analysis

We have to express that the seat cost indicated in the SNPRM is too low and so far from the realistic cost. We expect US airlines to submit their comments regarding the realistic cost to the FAA. We would like the FAA to perform the cost-benefit analysis again, based on US airlines' comments and our comments above-mentioned. The cost-benefit analysis revised would not justify the proposed change. We would like the FAA to make airlines spend important money for any primary preventive measure, which will prevent an accident, rather than such a secondary one after an accident has happened as the SNPRM.

At the last of our message we would sincerely like to ask the FAA to proceed with this issue keeping harmony with other airworthiness authorities outside the USA than Canada and the JAA. The FAA is a leading authority in the world and has a great deal of influence on the airworthiness authorities all over the world and on this issue, in particular, many countries will have to depend much on the FAA and US seat manufacturers.

Sincerely,

Shinya Moriyama,
Secretary-general of ATASCO Cabin Safety Working Group,

Deputy Director,
Engineering Department
All Nippon Airways Co., LTD
Fax No. 81-3-5756-5477, Tel No. 81-3-5756-5070, E-Mail : shinya.moriyama@ana.co.jp

List for members of ATASO CSWG;

Japan Airlines Co., Ltd.

Japan Asia Airways Co., Ltd.

Japan Air Commuter Co., Ltd.

Japan Air System Co., Ltd.

Japan TransOcean Air Co., Ltd.

All Nippon Airways Co., Ltd.

Air Nippon Co., Ltd.