

Comment Response Document

NPA 22 D-64

Comments received

- CAA
- Luftfartsverket
- EGU
- Soaring Society of America
- CAA Denmark
- CAA Monaco
- FAA
- Austro Control
- JAA Mr. Touret
- Chicester Miles Consultant
- FOCA
- British Midland Airways
- BGA

Review of Comments

- Eight commenters had no comments to offer. They agreed or accepted the proposal.

Other comments:

1. **The minimum level of energy absorption for the headrest padding material should be specified.**
The Study Group thought that "energy absorbent padding" was self explanatory. Nevertheless, the TÜV Rheinland was requested to supply information about specifications defining the energy absorption of the padding. The TÜV replied that no such specification was available. So, the text was not changed in this matter.
2. **Do existing headrest designs comply with the new requirements and what is the economic impact?**
The requirement will be applicable for new designs. Nevertheless, the manufacturers representative's position is the following: Even if headrests needed to be redesigned, it would not be of significant economic impact to the design of the sailplane. The justification is amended in this matter.
3. **Wording of JAR 22.788 c).**
Comment agreed text is changed to „(c) ... 135 daN normal to a vertical plane which touches the contact point of the head.“
4. **Wording of JAR 22.788 d).**
Regarding the comment paragraph (d), the following words were agreed „(d) The width and design of the headrest must not unduly restrict forward vision from either seat.“
5. **Wording of JAR 22.1585 k).**
The comment concerning paragraph (k) the new words agreed were „(k) Advice to the pilot for ... positioning of an adjustable headrest if installed.

6. **Change wording from „For that reason were taken advantage of ...“ to „For that reason advantage was taken of ...“ in the justification.**
The comment was agreed.
7. **The unit daN is not defined.**
The study group felt that daN is a well understood term and is used elsewhere in the JAR 22.
8. **The "a.m." research project is not defined.**
The research project "Harness Retention System in Sailplanes", carried out by the TÜV Rheinland is mentioned in the first sentence of the justification.
9. **Clarification is needed, what "ms" is.**
The unit "ms" means "milliseconds" and is now clarified in the justification.
10. **The material of the headrest should be non-flammable.**
With respect to the comments concerning flammability of the headrest, there are no flammability requirements anywhere in the JAR 22 apart from those within the designated fire zones. In any event the comment is not considered to be a flight safety problem as it occurs only if the canopy is open and aligned with the sun in a particular direction when it can act like a focusing lens on some types of sailplanes.