



U.S. Department
of Transportation
**Federal Aviation
Administration**

Memorandum

Subject: **INFORMATION**: Guidance on Emergency Egress for Part 23
Cargo Airplanes

Date: MAR 01 2001

From: Manager, Standards Office
Small Airplane Directorate, ACE-110

To: Manager, Anchorage Aircraft Certification Office, ACE-115N
Manager, Atlanta Aircraft Certification Office, ACE-115A
Manager, Boston Aircraft Certification Office, ANE-150
Manager, Brussels Aircraft Certification Staff, AEU-100
Manager, Chicago Aircraft Certification Office, ACE-115C
Manager, Denver Aircraft Certification Office, ANM-100D
Manager, Ft. Worth Airplane Certification Office, ASW-150
Manager, Ft. Worth Special Certification Office, ASW-190
Manager, Los Angeles Aircraft Certification Office, ANM-100L
Manager, New York Aircraft Certification Office, ANE-170
Manager, Seattle Aircraft Certification Office, ANM-100S
Manager, Wichita Aircraft Certification Office, ACE-115W

The following should be considered when approving supplemental type certificates for cargo conversions (no passenger seating) on airplanes with a certification basis of 14 CFR Part 23, including commuter category airplanes:

- Unless otherwise specified, the airplane “seating capacity” is defined as the number of occupants, both crew and passenger, for which the airplane is certificated. Simply removing seats from the seat rails does not change the seating capacity.
- Multiseat airplanes must have a second exit on the opposite side from the main door per §23.807(a)(1). Both exits must be accessible and must not be blocked with cargo.
- The §23.807(a)(3) conditional requirement for one crew compartment exit is applicable to all airplanes with a Part 23 certification basis, including commuter category.
- Airplanes with a crew compartment door that may block the pilot’s exit must have an exit in the crew compartment. In this circumstance, a normal, utility, or aerobatic category airplane with a certificated passenger seating capacity of zero (cargo only), a minimum of a single accessible exit in the cargo compartment in addition to the crew compartment exit (ref §23.807(a)(3)).

- A commuter category airplane with a certificated passenger seating capacity of zero (cargo only), two emergency exits (one on each side) are required in addition to the main door (ref §23.807(d)(1)(i)) regardless of the crew compartment door configuration.
- It is not acceptable to eliminate emergency exits by modifying an existing exit so it no longer complies with 14 CFR Part 23 airworthiness requirements. However, under certain circumstances, such as in an airplane with more than two exits, it may be permissible to block exits with cargo provided one or more exits remain accessible on each side of the airplane.

For those airplanes with a certification basis of 23-46 or later, the requirements of §23.805 need to be complied with when applicable.

- Section 23.805 requires two crew compartment exits or a singular hatch if the passenger exits are not convenient and readily accessible to the crew, while §23.807(a)(3) requires a single crew compartment exit if there is a door that is likely to block the crew's access to the passenger exits. If a crew compartment exit is necessary under §23.807(a)(3) the more stringent requirements of §23.805 are also applicable. [In other cases, the crew compartment exits may be required by §23.805 independent of §23.807(a)(3).] Crew compartment exits that comply with the requirements of §23.805 would also comply with §23.807(a)(3) without further showing.

Additionally, for those airplanes with a certification basis of 23-49 or later:

- Crew compartment exits that comply with the requirements of §23.805 would provide an equivalent level of safety to §23.787(c). According to the preamble to Amendment 23-49 (which added §23.787(c)), "this requirement would provide increased assurance that flight crews of all cargo airplanes will have ready access to an emergency exit."

If you have any questions or require additional information, please contact Mr. Scott Sedgwick, Regulations and Policy Branch, at telephone number 816-329-4132, or by facsimile at 816-329-4090.



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