



Make today a breakthrough.

November 1, 2022

Federal Aviation Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590-0001

Re: Request for Comments on Minimum Seat Dimensions Necessary for Safety of Air Passengers (Emergency Evacuation)

Dear Federal Aviation Administration,

As the leading national organization that supports and advocates for individuals with a rare disease known as spinal muscular atrophy (SMA), **Cure SMA is pleased to comment on the Minimum Seat Dimensions Necessary for Safety of Air Passengers in an Emergency Evacuation.** In summary, larger seat dimensions and seat pitch on aircrafts would make it safer for individuals with SMA and the passengers around them to evacuate in an emergency.

SMA is a degenerative neuromuscular disease that robs individuals of physical strength, greatly impacting their ability to walk, sit without supports, transfer independently, and perform other essential functions of everyday life. Muscle weakness can manifest throughout the body and can progress over time, often leading to loss of ambulation and loss of fine motor skills.

Many individuals with SMA use power wheelchairs that are tailored to their individualized SMA needs. When traveling by air, these individuals check their power wheelchairs at the gate, utilize an aisle chair to board the plane, and require assistance to be transferred to and from an airplane seat. A larger seat pitch is often needed to ensure there is enough room for an aide to be on either side for the transfer. **An adult with SMA shared:** *“All of my most difficult and most dangerous transfers from a plane seat to aisle wheelchair have come from not having enough room between seats for someone to be on either side of me. I cannot imagine how dangerous one of these transfers would be in an emergency.”*

Commonly, in single aisle aircrafts, the person with a disability is placed in the aisle seat and are first to board and the last to exit the plane. As a result, other passengers from that row must climb over the individual to get past. Additional leg room is also necessary to those individuals with SMA who travel with service dogs. The small seat pitch creates a bottleneck during the regular deplaning process and could be very problematic in an emergency, when every second matters. This can also be uncomfortable for the passenger with a disability and the other passengers in the row.



In addition to seat dimension, a crucial element to evacuate safely for a person with SMA is a movable arm rest. A movable arm rest makes the aisle chair transfer safer and easier for a person with SMA. Not having a movable arm rest will significantly increase the evacuation time for a person with SMA and will likely require additional assistance for that person to be lifted up and over the arm rest. **An adult with SMA shared:** *“Having a seat with a movable arm rest is very important as it is impossible for me to safely transfer without it.”*

Due to a lack of trunk control, many individuals with SMA require support cushions on either side of them to hold them up. In many cases, individuals with SMA may require sitting on their specialized wheelchair cushions to reduce the likelihood of pressure sores or pain. These seat cushions are often larger than the current economy airplane seats and may spill over into the aisle or the middle seat. Increasing seat dimensions would also alleviate this challenge for some passengers with disabilities.

**To help improve safety and evacuation during an emergency, Cure SMA recommends seats with a larger dimension and pitch for future aircrafts.** These changes will also improve the air travel experience for air passengers with disabilities and their fellow passengers. In addition, **Cure SMA reiterates the SMA community goal of using their own power wheelchair as their in-cabin passenger seat.** The ability to use personal wheelchairs directly on an airplane could also improve egress times on all flights, including emergency situations.

Thank you for the opportunity to provide comment on the air travel challenges of people with SMA, including their views and experience with seat dimensions. For more information, please contact Maynard Friesz, Vice President for Policy and Advocacy at Cure SMA, at [maynard.friesz@curesma.org](mailto:maynard.friesz@curesma.org) or 202-871-8004.

Sincerely,

A handwritten signature in black ink that reads "K. A. Hobby".

Kenneth Hobby  
President  
Cure SMA

A handwritten signature in black ink that reads "Maynard Friesz".

Maynard Friesz  
Vice President of Policy & Advocacy  
Cure SMA