



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

# InFO

Information for Operators

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Flight Standards Service  
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[http://www.faa.gov/other\\_visit/aviation\\_industry/airline\\_operators/airline\\_safety/info](http://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info)

*An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements with relatively low urgency or impact on safety.*

**Subject:** Flotation Equipment for In-Lap Children (Revised)

**Purpose:** This InFO provides operators with additional information to assist them in complying with Title 14 of the Code of the Federal Regulations (14 CFR) part 121, § 121.340, Emergency flotation means. This InFO incorporates the essential content of SAFO 06003, which has been canceled.

**Background:** § 121.340(a) requires that an airplane be equipped with a life preserver or approved flotation means for each occupant, that the device be within easy reach of each seated occupant and readily removable from the airplane. Part 121, § 121.311, Seats, safety belts, and shoulder harnesses, permits an adult occupying an approved seat to hold a child fewer than two years of age. This child is commonly referred to as an “in-lap” child. Questions have been raised about the applicability and adequacy of existing regulations regarding flotation equipment for an in-lap child.

One purpose of § 121.340(a) is to ensure that a flotation means is provided for each occupant. The flotation means may be a life preserver, a seat cushion, or a combination of flotation means. The FAA’s long-standing reading of § 121.340(a) is that all cabin occupants, including in-lap children, must have an individual flotation means available for use. That reading was affirmed in 1996, when the FAA issued a legal interpretation regarding § 121.340(a). The Office of General Counsel found that the rule requires a flotation means for all cabin occupants, including “in-lap” children.

## **Discussion:**

*Flotation equipment appropriate to the size of in-lap children*

Currently, part 121 does not distinguish between the type of flotation means required for adults and the type required for in-lap children. In other words, no explicit rule calls for an infant life vest or a special seat cushion for infants. As a practical matter, an adult might have trouble trying to control a child being buoyed by a typical full-sized life vest or seat cushion in the unlikely event of a landing in water and an in-lap child might benefit from specially-designed flotation equipment that keeps the child’s torso out of the water. Accordingly, the FAA encourages air

carriers to consider providing appropriately designed flotation equipment, either life preservers or other approved equipment, for use by in-lap children.

#### *Location of flotation equipment for in-lap children*

The FAA recognizes that an air carrier might encounter practical challenges in the installation of flotation equipment for in-lap children. One possible option is to permanently install a flotation device in a location within reach of the parent or guardian responsible for an in-lap child, such as in an overhead compartment or under a passenger seat. This installation would:

1. Locate the flotation device within reach of the individual who would presumably assist the in-lap child in donning the device;
2. Allow for a standardized location of in-lap flotation equipment across fleets; and
3. Allow an air carrier to provide both an in-lap flotation device and an additional drop-down oxygen mask at the same seat location.

Air carriers may nevertheless have concerns with this installation, such as the presence of adult-sized life preservers under passenger seats or potential difficulties in removing and donning the in-lap flotation equipment in the event of an inadvertent water impact.

Another possible option is to keep the in-lap flotation devices in a central location. Air carrier procedures could require a flight attendant to distribute a flotation device to the parent or guardian of an in-lap child prior to aircraft movement on the surface or as part of planned ditching procedures, and then to collect the flotation device after landing. Potential challenges of this installation include stowage considerations during flight and the possible delay in accessing an in-lap flotation device in the event of an inadvertent water impact.

The ability of a flight or cabin crewmember to assist effectively in a planned ditching or inadvertent water impact is the most important factor affecting survival of passengers. Regardless of the location of in-lap flotation equipment, the air carrier should develop procedures that address the use of the equipment in either a planned ditching or inadvertent water impact.

#### *Additional information in briefings to passengers about flotation equipment*

If an air carrier provides flotation equipment for in-lap children that is located or operates differently from the typical flotation equipment for other occupants, then additional information regarding that special equipment would be required in the briefing given to passengers. On the other hand, if that special equipment should differ only in respect to size (child versus adult) but not in location or function (both life vests are stowed and donned similarly) then no additional information would be required in the briefing.

**Recommended Action:** The director of safety and/or the director of operations for each air carrier operating under part 121 should accomplish the following:

- Review the flotation equipment installed for use by passengers, paying particular attention to type, size, and number of units installed, including spares;
- Consider installing flotation equipment designed specifically for in-lap children;
- Review procedures for use of installed flotation equipment for in-lap children in both planned ditching and inadvertent water impact;
- Expand the information contained in passenger briefings to address any differences in in-lap flotation equipment, particularly differences in location or function.

The following FAA documents contain additional information that may be helpful in reviewing ditching procedures:

DOT/FAA/AM-95/20, *Alternative Methods for Flotation Seat Cushion Use*

[http://www.faa.gov/data\\_research/research/med\\_humanfacs/oamtechreports/1990s/media/AM95-20.pdf](http://www.faa.gov/data_research/research/med_humanfacs/oamtechreports/1990s/media/AM95-20.pdf)

DOT/FAA/AM-98/19, *Analysis of Ditching and Water Survival Training Programs of Major Airframe Manufacturers and Airlines*

[http://www.faa.gov/data\\_research/research/med\\_humanfacs/oamtechreports/1990s/media/AM98-19.pdf](http://www.faa.gov/data_research/research/med_humanfacs/oamtechreports/1990s/media/AM98-19.pdf)