


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-119</p> <p>[Published on 23 July 2014 and officially closed for comments on 20 August 2014]</p>

Commenter 1: Air France Industries – Patrice Misdariis – 25/7/2014

Comment # 1

Further to Air France review of EASA PAD 14-119, Issue date 23 Jul 2014, Subject: "Auto flight / Instruments - Stop Rudder Input Warning - Installation / Activation".

Section: Required Action(s) and Compliance Time(s):

EASA PAD will oblige AFR to upgrade the FAC's (Upgrade or replacement) on 125 aircraft. This modification has a high financial impact and AFA believe that 48 months' time compliance is too short regarding modification cost and logistics organisation.

EASA response:

Comment not agreed. Taking into account the lead time for MOD/SB availability, 4 years compliance time is considered adequate.

No changes have been made to the Final AD in response to this comment.

Commenter 2: Bangkok Air – Anurak – 5/8/2014

Comment # 2

Regarding PAD 14-119,

1. Can you provide more information on the specific flight condition that can lead to exceeding of load limit on vertical tail?
2. Can you provide more detail or example of the in-service incidents or accident?

We would like to determine if our operations can be the case for this AD. We have our FWC H2F7 and FAC -0619. To compliance to the AD, we need to upgrade our FAC to -621 which is chargeable (no retrofit from Airbus) and the charge is about 10,000 USD per aircraft.

EASA response:

The AD decision is coming from in-service events that led in once case to the loss of the vertical tail on an A300. A significant event was experienced by an A319 followed by a NTSB investigation. Activation of the SRIW function is a preventive measure to limit dynamic effects on the vertical tail due to pedal

***inputs. Considering financial aspects is outside the scope of EASA.
No changes have been made to the Final AD in response to this comment.***

Commenter 3: American Airlines (US Airways) – Richard Castle – 14/8/2014

Comment # 3

American Airlines and US Airways have 258 aircraft impacted by this proposed rule and outside of the obvious logistical concerns of upgrading many Flight Augmentation Computers (FAC) and Flight Warning Computers (FWC) in a 48 month period, we have some other concerns with this proposed rule:

- SB A320-22-1480 requires activation of the SRIW logic by carrying out wiring modifications between FAC 1(2) and 1833VT and 1842VT terminal blocks in the 80VU rack. There is no indication in the service bulletin that the modification has been prototyped but for this work Airbus estimates 3 man-hours to complete. In our estimation, this wiring modification will take a least double that time. In addition to the wiring modifications, if FAC and FWC software upgrades are done at the aircraft at the same time then the total mod time will be more in the region of 10 to 12 man-hours.
- We note that this PAD is the result of safety recommendations related to in-service incidents and one accident on another aircraft type. While we don't argue the merits of this safety enhancement to the fleet, we question the need for such a short AD compliance time. Does a specific safety risk analysis determine the need for a 48 month compliance time or is this timeframe based on logistical capabilities of required LRU upgrades? Has an OEB to flight crews been considered to help mitigate the risk and give the maintenance community more time to comply with the mandate?

Based on the above, American Airlines would like to propose increasing the AD compliance time to 80 months to better align with our heavy maintenance visits for the wiring modifications and also allow more time to comply with the required FAC and FWC upgrades, which we do not believe is logistically feasible within the current 48 month proposed compliance time. In exchange we would be willing to add an Airbus authored OEB to our Pilot Handbook (FCOM equivalent) to better alert flight crews on the risk of overloading the rudder system.

EASA response:

See answer to comment #1 for the compliance time. OEB was not considered by Airbus as there is no direct safety impact. Information on this topic has been provided by Airbus during safety conferences and is part of the FCOM, AFM and FCTM (Flight Crew Training Manual) for the use of rudder.

No changes have been made to the Final AD in response to this comment.