


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 11-064</b> <b>Published on 01 July 2011 and officially closed for comments on 12 August 2011.</b>

**Commenter 1 (comments #1 through #3) : SMS support – Hélène EDIAR – 20/07/2011**

**Comment # 1**

Replace the value of the coefficient 6.96% to 6.3% as follows. Add the explanation on the computation of this percentage. Include the new revision of SMS SIL which incorporates these modifications: SIL N°: 102-2100-34-001 Rev 01 dated JUL 13/11. "The altitude displayed in feet is valid. However, the indicator systematically over-estimates the altitude in meters measured by the connected radio altimeter at a value **6.3%** higher than the measured value. **The wrong coefficient for feet to meters conversion used by IND201 is 0.324, when it should have been 0.3048 (0.324/0.3048) -1 = 6.3 %** "

**EASA response:**

**Comments accepted. The PAD has been revised accordingly.**

**Comment # 2**

Modify the paragraph related to "Required Action(s) and Compliance Time(s)" as follows:

"(1) Within 6 months after the effective date of this AD, verify that the display setting of the radio altimeter indicator is in feet. The selection of the indication unit in meters or feet is performed via pin programming. If the indicator displays the altitude in meters, modify the installation to set up the indicator in feet (the interface cable) or, to continue displaying the altitude in meters, replace the indicator with another approved indicator, no later than 12 months after the effective date of this AD, in accordance with approved instructions.

(2) From 12 months after the effective date of this AD, do not install a radio altimeter IND201, P/N 102-21(x)(x) on an aircraft, unless it has been modified in accordance with the instructions of SMS SIL 102-2100-34-001 Rev 01."

**EASA response:**

**Suggestions are partially accepted. However, please note that operators can apply for an alternative method of compliance (AMOC to the Final AD), e.g. by deactivating a radio altimeter which has not been modified, if it is required to display/operate in meters. This deactivation can be accomplished by pulling the corresponding circuit breaker. This alternative action would prevent possible confusion, arising from having in the cockpit some instruments displaying in meters and some others in feet.**

***The PAD has been revised accordingly. SMS SB102-2100-34-002 is expected to be issued to provide approved modification instructions.***

***Comment # 3***

In the paragraph related to “Ref. Publications”, the reference of the SIL should be updated as follows: “SMS (trading as Cobham Avionics) SIL 102-2100-34-001 Rev 01, original issue dated 13 July 2011.”

***EASA response:***

***Partially accepted. Revision 01 of the SIL is not the original issue. The PAD has been revised to include modified text as follows: SMS (trading as Cobham Avionics) SIL 102-2100-34-001, Revision 01 dated 13 July 2011.***

***Commenter 2 (comments #4 through #9): Eurocopter – Remy ANTONIOTTI – 11/07/2011***

***Comment # 4***

In the “Reason” paragraph, at the end of the first paragraph “Eurocae ED-30 §3.2.1.1 in meters”, add examples at 100ft (30, 478m) and 2000ft (609,6m) with what will be indicated by IND 201 and what will be the resulting error.

***EASA response:***

***Accepted. The PAD has been revised to include updated values with the coefficient from SIL 102-2100-34-001, Revision 01 dated 13 July 2011 (see comment #3 above).***

***Comment # 5***

In the paragraph related to “Reason”, replace this text:

This condition, if not detected and corrected, could adversely affect obstacle clearance, leading the flight crew to over-estimate the available margins, which could – under reduced visibility conditions – possibly result in controlled flight into terrain.

By the following text:

This condition, if not detected and corrected, could adversely affect clearance to the obstacles since it could lead the flight crew to over-estimate the height margins in meters to the obstacles ground.

***EASA response:***

***Partially accepted. The clarifications are accepted. However, the operational consequence with the risk of controlled flight into terrain is kept. The PAD has been revised, including a modified Reason section, as follows: “This condition, if not detected and corrected, could adversely affect obstacle clearance capabilities, leading the flight crew to over-estimate the available height margins in meters, which could – under reduced visibility conditions – possibly result in controlled flight into terrain.”***

**Comment # 6,**

In the section related to “Effective date”, replace “14 days after Final AD issue date” by “1 month after final AD issue date”.

**EASA response:**

**Comment not accepted. The effective date is the date when the compliance time starts, not when it ends. Making the AD effective 14 days later than standard would be equal to extending the compliance by 14 days. In response to another comment, the compliance time for modification has been extended from 6 to 12 months.**

**The revised PAD has not been changed in response to this comment.**

**Comment # 7**

In the section related to “Required Action(s) and Compliance Time(s)”, for all the helicopters identified as limited to VFR Day/Night operations, it is sufficient to inform operators about this problem.

**EASA response:**

**Not accepted. In addition to the changes described in comments #2 and #6, the PAD has been revised, including a modified Reason section, as follows: “This condition, if not detected and corrected, could adversely affect obstacle clearance capabilities, leading the flight crew to over-estimate the available height margins in meters, which could – under reduced visibility conditions – possibly result in controlled flight into terrain.”**

**Comment # 8**

In the section related to “Required Action(s) and Compliance Time(s)”, it is not recommended to change the unit configuration in feet in order to avoid any not consistent altitude information with other altitude indicators in the cockpit.

**EASA response:**

**Comment not understood. An AD, by definition, does not contain ‘recommended’ actions. If the commenter suggests that, depending on aircraft equipment settings, retaining the unit configuration in meters should be an equally safe option, then please note that operators can apply for an alternative method of compliance (AMOC to the Final AD), provided the alternative is fully substantiated.**

**Comment # 9**

General remarks: the anomaly is related to few helicopters: a total of 13 Russian and Chinese helicopters. The affected helicopters are not IFR (only VFR). The radio altimeter does not provide a primary parameter; thus, erroneous information from the radio altimeter is classified as having a major impact in the worst conditions.

**EASA response:**

**Not accepted. AD action is considered necessary because a radio altimeter is required equipment, according to JAR-OPS 3.660, to allow certain over water**

*operations. Additionally, in some installations, the radio altimeter is listed in the required configuration for operating in CAT A for: surface level helipad operations and short field heliport operations.*

*No changes have been made in the revised PAD in response to this comment.*