


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-064R1 Published on 26 September 2011 and officially closed for comments on 24 October 2011.

Note: Previous comments #1 through #9 were made to PAD 11-064 as originally issued and can be found in CRD PAD 11-064.

Commenter 3 (comments #10 through #13) : TC&S – Marian Kwartnik – 28/09/2011

Comment # 10

In the section related to “Reason”, last sentence “For the reasons described above”:

To be consistent with the section “required “Required Action(s) and Compliance Time(s)”, **the following is proposed:**

For the reasons described above, this AD requires verification of the display setting of the radio altimeter indicator IND201 ~~and~~. If found to display in meters, **this AD requires modification of the installation to restrict usage of the radio altimeter indicator IND201 to feet display mode only, or the replacement with an approved indicator which correctly operates in meters.**

EASA response:

Accepted. The Final AD has been amended accordingly.

Comment # 11

In the section related to “Required Action(s) and Compliance Time(s)” §(2) :

To modify the installation to set up the indicator in feet (the interface cable), **cannot be done with the instructions of SMS Service Bulletin (SB) 102-2100-34-002 (to be issued), it should be done through Aircraft manufacturer instructions .**

To continue displaying the altitude in meters, replace the indicator with another approved indicator, in accordance with approved instructions. **In this case the instructions are the SMS Service Bulletin (SB) 102-2100-34-002 (to be issued).**

The following is proposed:

(2) If the indicator displays the altitude in meters, within 12 months after the effective date of this AD, modify the installation to set up the indicator in feet (the interface cable), ~~in accordance with the instructions of SMS Service Bulletin (SB) 102-2100-34-002 (to be issued)~~ or, to continue displaying the altitude in meters, replace the indicator with another approved indicator, in accordance with ~~approved instructions.~~ **the instructions of SMS Service Bulletin (SB) 102-2100-34-002 (to be issued)**

EASA response:

Partially accepted. There is also a need for the SMS Service Bulletin (SB) 102-2100-34-002 (to be issued) to be reviewed and accepted by the aircraft manufacturer. This should be contained in approved aircraft manufacturer's instructions. The Final AD has been amended as follows:

(2) If the indicator displays the altitude in meters, within 12 months after the effective date of this AD, modify the installation to set up the indicator in feet (the interface cable) in accordance with approved aircraft modification instructions or, to continue displaying the altitude in meters, replace the indicator with another approved indicator (different P/N), in accordance with approved aircraft modification instructions.

Comment # 12

In the section related to "Required Action(s) and Compliance Time(s)" §(3) :

This paragraph §(3) is not well understood. Indeed, after the modification of the installation to set up the indicator in feet as required in §(2), the usage of the indicator is restricted to feet display mode only. As per the last sentence (in the section Reason) "For the reasons described above" and as per §(2), there is no need to replace or to modify the indicator.

It is proposed to delete §(3)

EASA response:

Not accepted. This prohibition prevents that a spare radio altimeter indicator IND201, P/N 102-2100, with the wrong conversion factor, gets inadvertently installed after the aircraft has been modified. See also comment #19.

Comment # 13

In the section related to "Required Action(s) and Compliance Time(s)" §(4) :

From the effective date of this AD (PAD closed for consultation the 24 of October), the modification and the service bulletin will not be approved by the Aircraft manufacturer, this process need at least 6 months. Considering the Aircraft installation will be set up only to use the radio altimeter indicator IND201, Part Number (P/N) 102-21(x)(x) in feet, **we propose to write the §(4) as follows:**

(4) For an aircraft that, ~~on 6 months after the effective date of this AD,~~ does not have a radio altimeter indicator IND201, P/N 102-21(x)(x) installed, ~~from the effective date of this AD,~~ do not install a radio altimeter indicator IND201, P/N 102-21(x)(x), on that aircraft, ~~unless that aircraft installation set up the indicator in feet, or unless the indicator has been modified in accordance with the instructions of SMS (trading as Cobham Avionics) SB 102-2100-34-002 (to be issued).~~

Note: the 6 months period is introduced to cover the above-mentioned period for the modification/SB process (at least 6 months). This period is also consistent with the 6 months verification period in §(1). After this 6 months periods, all aircrafts installation in meters will be installed with the modified indicator

EASA response:

Comment accepted. The Final AD has been amended to allow a period of 12 months, before the prohibition to install an unmodified altimeter comes into force.

Commenter 4 (comment #14) : SMS Support (Cobham Avionics) – Hélène Ediar – 11/10/2011**Comment # 14**

Our comments on the PAD n° 11-064R1 § required actions and compliance time:

The aircraft operator cannot change the interface cable himself. This cable does not belong to the SMS perimeter in the IND201 product. It is defined by the aircraft manufacturer. We do not know if ECF enables the user to access to the cable, and in any case, it seems dangerous to change from meters to feet for a pilot used from long date to well-known figures in meters. The risk would be for him to fly at altitudes 3 times lower than before.

EASA response:

Partially accepted. The part on the change of cable is accepted and covered in response to comment #11. The rest of the comment does not apply to instructions related to the change in the cable and seems to address a totally different aspect, namely flying with an altimeter indication in feet. The indicator displays the unit. If the pilot uses a radar altimeter indication in feet instead of meters, he should also use the altitude limitations in feet.

Commenter 5 (comment #15) : TC&S – Marian KWARTNIK – 20/10/2011**Comment # 15**

In all the sections related to Radio altimeter indicator IND201, Part Number (P/N) 102-21(x)(x),

This structure of P/N is no longer consistent with the P/N structure define in the Manual of alternatives procedures to ETSO Ref. : M3/04/12 Ed D Rev. 0 approved in 2010. In this manual the new P/N structure is P/N 102-2100-(XX), so the minor evolution will be traced in the new XX P/N structure as follow : the change will be identified from the old Part Number (P/N) 102-21(x)(x) to the new Part Number (P/N) 102-2100-(XX) .

It is then necessary to indicate in the AD the whole old (P/N) 102-2100 (no other value exist for the (x)(x)).

The following correction is proposed:

To replace in all the AD P/N 102-21(x)(x) by P/N 102-2100

EASA response:

Comment accepted. The part numbering system for the product has changed. Only part number 102-2100 is affected by this PAD. The original approval JTSO F.O.051 will be re-issued under a new EASA number in order to change the part numbers on the certificate into 102-2100-(X)(X), replacing the P/N 102-21(X)(X), and to introduce a limitation to usage in feet to new P/N 102-2100 units. Only P/N 102-2100 units have been manufactured until now.

Commenter 6 (comments #16 through #19) : Eurocopter – Remy ANTONIOTTI – 20/10/2011

Comment # 16

In the section related to “Applicability”, the PAD makes reference to Radio altimeter indicator IND201, Part Number (P/N) 102-21(x)(x) while only Part Number (P/N) 102-2100 is concerned (refer to SMS SIL 102-2100-34-001, Revision 01 dated 13 July 2011). As the SMS P/N will be incremented (refer to SMS SIL), EC propose to replace:

Radio altimeter indicator IND201, Part Number (P/N) 102-21(x)(x), all serial numbers.

by

Radio altimeter indicator IND201, Part Number (P/N) 102-2100, all serial numbers.

EASA response:

Accepted. See response to comment #15.

Comment # 17

In the section related to “Reason”, in order to be consistent with section related to " Required Action(s) and Compliance Time(s)", EC propose to replace

For the reasons described above, this AD requires verification of the display setting of the radio altimeter indicator IND201 and, if found to display in meters, modification of the installation to restrict usage of the radio altimeter indicator to feet display mode only.

by:

*For the reasons described above, this AD requires verification of the display setting of the radio altimeter indicator IND201 and, if found to display in meters, modification of the installation to restrict usage of the radio altimeter indicator to feet display mode only, **or replacement with an approved indicator which correctly operates in meters.***

EASA response:

Accepted. See response to comment #10.

Comment # 18

In the section related to “Required Action(s) and Compliance Time(s)” §2, the SMS Service Bulletin (SB) 102-2100-34-002 is not dedicated to set up the indicator in feet, but to replace the defective indicator by another indicator IND201 with upgraded software correcting the default for the meters indication. EC will provide a Service Bulletin providing instructions for the set up in feet. Consequently, EC propose to replace

If the indicator displays the altitude in meters, within 12 months after the effective date of this AD, modify the installation to set up the indicator in feet (the interface cable), in accordance with the instructions of SMS Service Bulletin (SB) 102-2100-34-002 (to be issued) or, to continue displaying the altitude in meters, replace the indicator with another approved indicator, in accordance with approved instructions.

By

*If the indicator displays the altitude in meters, within 12 months after the effective date of this AD, modify the installation to set up the indicator in feet (the interface cable), in accordance with the instructions **of dedicated aircraft manufacturer Service Bulletin** or, to continue displaying the altitude in meters, **modify the IND201 in accordance with the instructions of SMS Service Bulletin (SB) 102-2100-34-002 (to be issued) or, replace the indicator with another approved indicator, in accordance with approved instructions.***

EASA response:

Partially accepted. See response to comment #11. There is also a need for the SMS Service Bulletin (SB) 102-2100-34-002 (to be issued) to be reviewed and accepted by the aircraft manufacturer. This should be contained in approved aircraft manufacturer’s instructions.

Comment # 19

In the section related to “Required Action(s) and Compliance Time(s)” §3, the comment #3 is also applicable. Consequently, EC propose to replace

After modification of an aircraft as required by paragraph (2) of this AD, do not install a radio altimeter indicator IND201, P/N 102-21(x)(x) on that aircraft, unless it has been modified in accordance with the instructions of SMS SB 102-2100-34-002 (to be issued).

By

*After modification of an aircraft as required by paragraph (2) of this AD, do not install a radio altimeter indicator IND201 P/N 102-21**00** on that aircraft, unless it has been **installed as required by paragraph (2) of this AD.***

EASA response:

Not accepted. This paragraph concerns the modification status of the indicator that is to be installed as replacement, not the modification status of the aircraft. No changes have been made to the Final AD in response to this comment.