



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-158

[Published on 21 November 2017 and officially closed for comments on 19 December 2017]

Commenter 1: Lufthansa Technik – Jens Wiedau – 28/11/2017

Comment # 1

1) LHT is interested to reduce the complexity. LHT would like to suggest the following changes to simplify the understanding:

The compliance time for requirements of paragraph (1) and (2) is already in the past. The requirements have to be fulfilled not later than 25 month after 01. June 2015. To be compliant with this requirement ELAC L97+ or newer has to be installed not later than 30. June 2017. Furthermore LHT deemed the Restatements as obsolete, as it was mandatory to comply to them already! However, as the EASA decided to supersede the EASA AD 2015-0088R1 by this new AD, LHT is well aware this configuration needs to be mandated, but this can be done using the following requirement instead:

NEW Para (1)

With the effective date of this AD, a minimum of ELAC standard L97+ must be installed on affected aircraft.

ELAC standard L97+ can be installed in accordance with SB A320-27-1243 (installation of data-loadable ELAC P/N 3945129100 unit with L97+ software 3945129109)

or SB A320-27-1244 (installation of non-data-loadable ELAC L97+ P/N 3945128215)

or during production with Airbus MOD 156546 (installation of data-loadable ELAC P/N 3945129100 unit with L97+ software 3945129109) or MOD 156550 (installation of non-data-loadable ELAC L97+ P/N 3945128215).

Note (X): ELAC P/N's listed in Appendix 2 of this AD are in compliance with paragraph 1 of this AD.

With this change, the paragraphs (1), (2), (6) and (7), Note 3 will be obsolete.

2) Note 7 should also referring to paragraph (8) in addition to para (5) and (9), because there are NEO's delivered with L99 which are in compliance to this AD requirement!



3) LHT has found a logic mistake within the requirement to update the ELAC to the last software standard.

Paragraph (5) allows installing software standards – approved after the effective date of this AD! This means that paragraph (5) will be applicable for ELAC standard L102 and following.

ELAC standard L101 is approved previous to the effective date of this AD, which is to be considered as an exceptional case, but based on the wording used ...approved after the effective date... it is not allowed to use a procedure according to paragraph (5). Para (9) covers installation of ELAC L101 previous to the AD effective date only. This means that it will not be legal to install ELAC L101 standard after the effective date of this AD iaw. this paragraph (5).

LHT is requesting to open paragraph (5) for ELAC L101 standard, e.g. by using a note like this:

“Note (X): This paragraph is applicable for ELAC L101 standard as well, although it is approved before the effective date of this AD.”

EASA response:

- 1) EASA disagrees. It is correct that all affected aeroplanes should have been equipped with at least ELAC L97+ by 30 June 2017. However, the L97+ requirement is retained until the compliance time for ELAC L99 installation has been reached, as a precautionary measure for aeroplanes which may not yet be in compliance with AD 2015-0088R1. Since paragraphs (1) and (2) only apply for such non-compliant aeroplanes (if any), EASA considers that creating a new text is not necessary. These paragraphs, as well as paragraphs (6) and (7), can be disregarded for any aeroplane already equipped with L97+ or higher. No changes were made to the AD text further to this comment.
- 2) EASA agrees. Note 7 has been changed to refer to paragraph (8) in addition to para (5) and (9), thus addressing NEO delivered with L99 standard.
- 3) EASA agrees. Paragraph (5) has been amended to include the ELAC L101 standard as an alternative to installing L99. Installation of ELAC L101 is therefore allowed before the effective date of the AD (in accordance with the provisions of paragraph (9)), as well as after the effective date of the AD (in accordance with the provisions of paragraph (5)).



Commenter 2: British Airways – Dan Walpole – 12/12/2017

Comment # 2

Following a review of EASA PAD, BAW believe that a few points could be clarified to ease operators in understanding the intent. Under the new requirements of this AD section

Can EASA define the compliant ELAC software standards?

Can the modification / replacement section (3) be changed to state “upgrade each ELAC unit by uploading L99 software P/N 3945129111 (or Airbus approved later standard) or by replacing existing ELAC units with ELAC L99 P/N 3945128217 units (or Airbus approved later standard) (see Note 6 of this AD) in accordance with the applicable SB, or in accordance with modification instructions which are:

If the above section cannot be changed BAW request and update to Section (5) “Installation of an ELAC unit P/N 3945129111 or 3945128217 (or any subsequent standard) is equal to the compliance with the requirements of paragraph (3) of this AD, provided the conditions as specified in paragraphs (5.1) and (5.2) of this AD are met.”

I would like to highlight a concern with the current wording of statement (5) “Installation of an ELAC unit P/N approved after the effective date of this AD is equal to compliance with the requirements of paragraph (3) of this AD” Can EASA please advise on the expected effective date of this AD? Will the effective date be set to the software released date for ELAC L99? If this is the case BAW request that EASA increase the compliance time limitation for all fleets to make up the compliance window to a minimum of 24 months from the release of the AD. If the effective date will be set to Dec 2017 or Jan 2018 can EASA either amend this note to remove the section “ELAC unit P/N approved after the effective date” and define the standards? This will remove confusion as ELAC L99 and L101 were approved prior to the effective date of this AD.

EASA response:

Compliant ELAC software standards are L99 (as required by paragraph (3)); or a higher standard approved before (i.e. L101) or after the effective date of this AD, and meeting the conditions of paragraphs (5.1) and (5.2).

EASA disagrees with the proposed change to the “Modification / Replacement” paragraph (3) to state “upgrade each ELAC unit by uploading L99 software P/N 3945129111 (**or Airbus approved later standard**) or by replacing existing ELAC units with ELAC L99 P/N 3945128217 units (**or Airbus approved later standard**) [...]” because use of these later standards is subject to the conditions of paragraphs (5.1) and (5.2). No changes were made to the AD text further to this comment.

EASA agrees to amend paragraph (5) to refer to all allowed standards higher than L99, regardless of their respective approval date. (No reference is made here to the ELAC L99 P/Ns, as L99 is not an alternative to, but already required by paragraph (3)). The AD text has been changed accordingly.



Further to the changed wording of paragraph (5), the AD effective date is no longer linked with the approval date of ELAC standards. The compliance time for installation of ELAC L99 standard remains as specified in Table 1, counted from the effective date of the AD.

