

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-044 [Published on 16 April 2015 and officially closed for comments on 14 May 2015]

Commenter 1: Cathay Pacific – Christopher Tse – 17/04/2015

Comment # 1

Please find below Cathay Pacific Airways (CPA)/Hongkong Dragon Airline (HDA)'s comments on PAD 15-044:

“Reason” block:

- (1) Some of the Airbus SBs listed in Appendix 1 of this AD are not available at this time. It is expected that this AD will be revised..... Please note draft or non-existent documents should not be rendered mandatory. Only approved and available documents are eligible. Therefore, EASA is requested to contact Airbus to ensure the availability of these documents and approved PRIOR to the issue of this AD.

“Required Action(s) and Compliance Times”:

- (2) Paragraph (3) – This paragraph is should read: “Installation of a latter FCPC software standard approved after the effective date of this AD is equal to compliance with the requirements of paragraph (1) on this AD.” Operators do not have design approval to modify Level A and Level B (for Hong Kong CAD, also Level C) aircraft software. Therefore, any changes to the FCPC software will be covered by the issuance of an Airbus Service Bulletin.
- (3) Paragraphs (4), (5), and (6) and reference to EASA AD 2010-0081 R1, 2011-0199 R1, 2013-0107, and 2012-0271: This can be changed to a generic declaration at the beginning of the AD, for example: “Compliance with paragraphs (1) or (3) retains compliance with EASA ADs 2010-0081 R1, 2011-0199 R1, 2013-0107, and 2012-0271.”
- (4) Paragraph (7) – Reversion to an earlier FCPC software standard: New FCPC software standards always supersedes the old/existing FCPC software standard(s). This paragraph should be re-worded to read: “Aeroplanes on which Airbus modification 202680 has been embodied in service or Airbus SB A330-27-3205 (installation of software standard P13/M22) has been embodied in service, are not affected by the requirements of paragraph (1) and (3) of this AD.”

Appendix 1:

- (5) CPA/HDA A330s (including pre-MOD 49144 aircraft) are fitted with FCPC 2K2, however, Rev.00 of Airbus SB A330-27-3205 do not take into consideration aircraft post-SB A330-27-3176 Rev.01. This is due to the fact that certification of FCPC 2K2 P13/M22 has yet to be certified on mechanical rudder (pre-MOD 49144) A330 aircraft. Therefore, CPA/HDA request EASA to postpone the issue of this proposed AD until the installation of FCPC 2K2 P13/M22 has been certified for fitment onto pre-MOD 49144 aircraft.

EASA response:

- (1) ***Comment understood, but not agreed. Airbus has confirmed that all affected SBs will be published before the end of compliance time requested in the AD, allowing operators to start planning and accomplishing the required actions.***

- (2) Comment understood, but not agreed. The intent of the wording of paragraph (3) is twofold: to ensure that (i) an Airbus-approved (under EASA DOA) or directly EASA-approved software is installed, and that (ii) approved aircraft modification instructions are used to install that software on aircraft.*
- (3) Comment understood, but not agreed. Paragraph (4) refers only to “the modification requirement of paragraph (8) of EASA AD 2010-0081R1”, not the entire AD, while paragraph (6) is related only to a select group of aeroplanes in a distinct configuration. These aspects were deemed enough reason to keep these paragraphs separate.*
- (4) Comment understood, but not agreed. The AD requires accomplishment of SB A330-27-3205, which means that a post-SB aeroplane would be ‘affected’ by the AD, but already compliant with this particular required action. The AD should be recorded in that aeroplane’s technical log as such, which is the intent of the credit given in the RACT section, “Required as indicated, unless accomplished previously”.*

No changes have been made to the Final AD in response to points (1) through (4) of this comment.

- (5) SB A330-27-3205 will be revised in order to extend the effectivity of the SB to aircraft fitted with mechanical rudder. This SBs will be published before end of compliance time requested in the AD, allowing operators to start planning and accomplishing the required actions.*