

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-044R1 [Published on 01 June 2015 and officially closed for comments on 15 June 2015]

Commenter 1: American Airlines – Diana Curlee – 08/06/2015

Comment # 1

- (1) In order to avoid confusion with the previous AD requirements related with the FCPC software, AAL wants to suggest consolidating all of the previous AD requirements on the new AD. The installation of the upgraded FCPC software will affect the requirements of the EASA ADs mentioned in the PAD No. 15-044 and also the requirements of EASA AD 2010-0081R1 paragraph (11), EASA AD 2010-0109R1 and EASA AD 2012-0069.
- (2) Review paragraph (4) or create a new paragraph to clarify that an aeroplane modified as required by paragraph (1) of this AD, or as specified in paragraph (3) of this AD, as applicable, terminates the requirement of paragraph (8.1) and paragraph (11) of EASA AD 2010-0081R1.
- (3) Modify paragraph (5) to clarify that an aero plane modified as required by paragraph (1) of this AD, or as specified in paragraph (3) of this AD, as applicable, terminates the requirements of EASA AD 2011-0199R1.
- (4) Add a paragraph to clarify that an aeroplane modified as required by paragraph (1) of this AD or as specified in paragraph (3) of this AD, as applicable, the operational procedures as imposed by EASA AD 2012-0069 and EASA AD 2010-0109R1 are no longer required for that aeroplane.

EASA response:

- (1) Comment understood, but not agreed. EASA AD 2010-0081R1, AD 2010-0109R1 and AD 2012-0069 address different unsafe conditions and therefore cannot (easily) be combined or consolidated within one single AD. Moreover, only paragraph (8) of AD 2010-0081R1 requires modification of the FCPC. Paragraph (11) of AD 2010-0081R1 or paragraph (5) of AD 2010-0109R1 only recognise FCPC modification in accordance with the listed Airbus Service Bulletins (SB) as an acceptable method to comply with paragraph (8.1) of AD 2010-0081R1 or with the requirements of AD 2010-0109R1, as applicable. Additionally, the compliance time for paragraph (8) of AD 2010-0081R1 expired on 11 May 2012 and EASA expects (although we cannot assume) that the affected fleet is compliant with that requirement.**
- (2) Comment understood, but not agreed. As paragraph (8) of EASA AD 2010-0081R1 does not require repetitive actions (a one-time modification only), the use of the wording ‘terminating action’ is not appropriate. Paragraph (4) of this AD only confirms that an aeroplane modified as required by this new AD remains compliant with paragraph (8) of EASA AD 2010-0081R1. Paragraph (11) of AD 2010-0081R1 does not require any action, but only introduces an acceptable alternative method to comply with one action required by paragraph (8) of EASA AD 2010-0081R1.**
- (3) Comment understood, but not agreed. EASA AD 2011-0199R1 addresses a different unsafe condition than this AD and requires a one-time modification. Paragraph (5) does not ‘terminate’ (see also EASA answer to point (2) above) the modification as required by AD 2011-0199R1 but specifies that an aeroplane modified as required by this AD remains compliant with the modification requirement of AD 2011-0199R1.**
- (4) Comment partially agreed. For the operational procedures as imposed by EASA AD 2012-0069, paragraph (2) of this AD already clarifies that an**

aeroplane modified as required by paragraph (1) does not require anymore the operational procedures as imposed by EASA AD 2012-0069. For EASA AD 2010-0109R1, a new paragraph (3) has been added to confirm a similar situation.

No changes have been made to the Final AD in response to points (1), (2) and (3) of this comment.

Commenter 2: Lufthansa Technik AG – Gregory Templeman – 16/06/2015

Comment # 2

1. EAD Para.(1) requires modification of FCPC i.a.w. Service Bulletins which at this time have not yet been published.

Airbus SB A330-27-3205 original issue dated 09 March 2015.

Airbus SB A330-27-3207 [to be issued in July 2015].

Airbus SB A330-27-3208 [to be issued in April 2017].

Airbus SB A340-27-4195 [to be issued in December 2015].

Airbus SB A340-27-4196 [to be issued in December 2015].

Airbus SB A340-27-5064 [to be issued in July 2016].

Compliance times for these modifications are given “after the effective date of this AD”. Since we have no control over the release date of the Service Bulletins, please ensure that the compliance times are based upon a start date of the SB publication date.

Appendix 1 - Software Standard updates and Compliance Time

Software Standard	Hardware Standard(s)	Airbus SB	Compliance Time (after the effective date of this AD)
P13/M22	FCPC 2K2	SB A330-27-3205	Within 9 months
P14/M23	FCPC 2K1	SB A330-27-3207	
M23	FCPC 2K0	SB A330-27-3207	
MRTT 3	FCPC 2K2	SB A330-27-3208	Within 24 months
L24	FCPC 2K1 or 2K0	SB A340-27-4195	Within 15 months
L23	FCPC 2K2	SB A340-27-4196	
W13	FCPC 2K2	SB A340-27-5064	

2. In paragraphs (4)-(6) you state that an A/C modified i.a.w. this AD, is still compliant with previous ADs. However, it is not clear for us why paragraph 4 references compliance with just one paragraph of the EAD 2010-0081R1, while paragraph 5 references compliance with the modification requirements of EASA AD 2011-0199R1 and EASA AD 2013-0107 without specifying a specific paragraph. These statements are considered as new. Please advise reason for explicitly mentioning this.

- (4) An aeroplane modified as required by paragraph (1) of this AD, or as specified in paragraph (3) of this AD, as applicable, remains compliant with the modification requirement of paragraph (8) of EASA AD 2010-0081R1 for that aeroplane.
- (5) An aeroplane modified as required by paragraph (1) of this AD, or as specified in paragraph (3) of this AD, as applicable, remains compliant with the modification requirements of EASA AD 2011-0199R1 and EASA AD 2013-0107 for that aeroplane.

EASA response:

- 1. Comment understood, but not agreed. Airbus has confirmed that all affected SBs will be published in due course, allowing operators sufficient time for planning and accomplishing the required actions. No changes have been made to the Final AD in response to this comment.**
- 2. Comment understood. The purpose of these paragraphs is to confirm that, after modification of an aeroplane as required by this new AD, the aeroplane still remains compliant with certain requirements of previous ADs. Referencing a specific paragraph (or not) is only done when relevant, i.e. in case no other requirements of a previous AD are related, only a single paragraph will be mentioned. Paragraph (5) is amended to clarify that all requirements of the 2 ADs are addressed by the modification as required by this new AD.**