

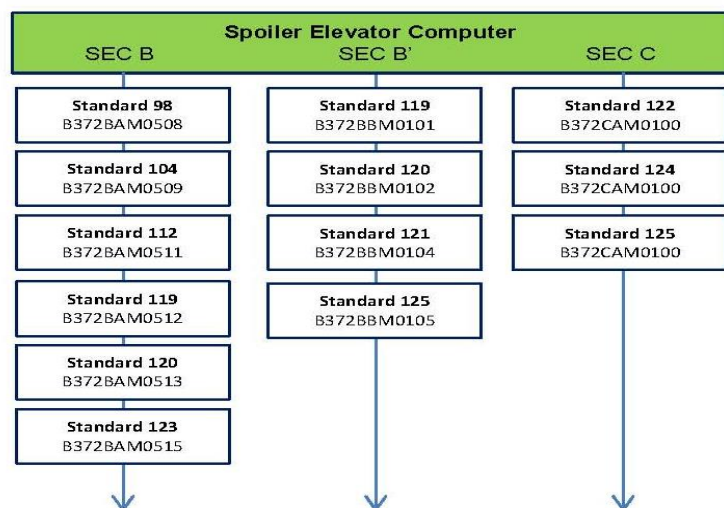
EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-112 [Published on 27 August 2015 and officially closed for comments on 10 September 2015]

Commenter 1: Etihad Airways – Borja Dosal Roiz – 27/08/2015

Comment # 1

In regards to PAD 15-112 Etihad would like to make the following comments:

1. In comparison with previous SEC hardware stds B and B', the hardware PN of SEC std C does not change thru the installation of different software stds 122, 124, 125, etc... For that reason, Etihad would recommend to EASA to specify throughout the document that the "P/N B372CAM0101, P/N B372CAM0102 and P/N B372CAM0103" are software PNs and the correspondent SEC hardware P/N is B372CAM0100. Please see [below] Thales SEC stds for further clarification.



2. As mentioned in the PAD and Airbus FOT 999.0107/15 the solution will be introduced from SEC C Standard 126. Please consider including in the AD the full reference of this new std, by referring to it as: "SEC C Standard 126 P/N B372CAM0100 with operational software P/N B372CAM0104".
3. In Table 1, Etihad would like to suggest changing the following sentence: "Turn off then on SEC 1 and SEC 2 one after the other" by "Turn OFF then ON SEC 1 and SEC 2 one after the other" for better understanding.

4. In section (2), EASA forbids the installation of SEC hardware C software standards 122, 124 or 125. Etihad would like to advice mentioning in this point of the AD that the installation of SEC C Standard 126 will be the terminating action for this procedure.

EASA response:

1. **Comment agreed. The Final AD has been amended accordingly.**
2. **Comment agreed. The Reason section of the PAD already stated that SEC C standard 126 software P/N B372CAM0104 would likely be the solution, which has now been confirmed. The Final AD has been amended accordingly by introducing a new paragraph (s) in the RACT section.**
3. **Comment agreed. The Final AD has been amended accordingly.**
4. **Comment agreed. See EASA answer to point 2 above.**

Commenter 2: Cathay Pacific Airways Limited – Dicky Or – 28/08/2015

Comment # 2

After reviewing the PAD 15-112, CPA has following concern:

1. Ref para (2), technically “SEC C” and “SEC B” are 2 way interchangeable and intermixable (see Airbus ISI 27.94.0001), for a/c that fitted with SEC B, replacing with a SEC C should not consider as a modification as described in the AD.
2. There is no effective mean to prevent maintenance personnel to replace a SEC B with SEC C, which then easily violates the AD requirement. Therefore pls review if there is any operational impact when the same SEC reset procedure being applied on SEC B, CPA propose the procedure should apply on all a/c if SEC C in concern is installable.

EASA response:

1. **Comment agreed. See EASA answer to Comment #1 point 2 above.**
2. **Comment not agreed. The AD requirements, as written, are self-explanatory. Aeroplane configuration management – which should include procedures to prevent maintenance errors – remains the operator’s responsibility. No changes have been made to the Final AD in response to this comment.**

Commenter 3: Lufthansa Technik – Benjamin Krick – 28/08/2015

Comment # 3

Currently SIL/ISI 27.94.00001 allows a interchangeability and mixability between SEC C and SEC B/B’ hardware standards. The interchangeability/mixability depends on the SEC C operational software.

To ensure compliance with PAD 15-112 §2, it will be necessary to revise this SIL and remove the interchangeability/mixability with SEC C hardware. The SIL can be used as guideline regarding interchangeabilities, in case of potential AOGs caused by non-available SEC B/B’ spare parts.

It could be possible, that a SEC C will be installed instead of a SEC B/B' as a corrective action during line maintenance. For the maintenance personal it is not traceable, that the AFM procedure has to be adapted with this component change. The Airbus documentation does not give any advises.

To ensure compliance with §2 LHT recommends to revise SIL/ISI 27.94.00001 previous to the AD release.

EASA response:

Comment not agreed – see EASA answer(s) to Comment #2. EASA suggest to contact AIRBUS for revision of the documentation.

No changes have been made to the Final AD in response to this comment.

Commenter 4: British Airways – Daniel Fenwick – 02/09/2015

Comment # 4

Ref Action (2), the PAD states "From the effective date of this AD, do not modify an aeroplane by installation of a SEC having hardware C..." This statement should be re-worded to prohibit installation of a SEC C unit in only the SEC 1 and SEC 2 positions without incorporating AFM TR 572, as installation in to the SEC 3 position does not require compliance with this AD.

It would be useful to operators to allow installation of SEC C units in the SEC 3 position (as permitted by the IPC/ISI 27.94.0001) in order to disperse the SEC C units throughout the fleet thus avoiding the requirement to perform AFM TR 572 on every sector. The lack of availability of SEC B units from Airbus/Thales makes it difficult for operators to avoid incorporating AFM TR 572 by alternative means, e.g. removing all SEC C units from SEC 1 and SEC 2 positions.

With the final fix not being available unit end Q4 2015 at the earliest, introducing AFM TR 572 introduces a significant burden on the flight crew procedures during a critical phase of the push-back/departure process.

EASA response:

Comment agreed. The Final AD has been amended accordingly.