


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 15-115</p> <p align="center">[Published on 03 September 2015 and officially closed for comments on 01 October 2015]</p>

Commenter 1: British Airways – Rob Vessey – 04/09/2015

Comment # 1

BAW are concerned with the reduction of the Compliance time which has been reduced by 24 months not only from a fleet retrofit, of 130 aircraft, point of view but more with the revision eliminating the possibility of installing the New specification Pitot Probes available from Q3 2016. BAW see that the current icing condition events can still be experienced on the Goodrich Pitot Probe Part No. 0851HL and not having the option of retrofitting to the new Pitot Probes Part No. 0851MC will prolong, and induce further downtime of aircraft, current airspeed events susceptible to the only available probes. BAW would also appreciate comment of the confirmation of supply of the Pitot Probes Part No. 0851HL to meet the revised Compliance date.

EASA response:

Comment not agreed. Paragraph (6) of the AD allows, provided properly certified and using approved aircraft modification instructions, installation of new specification pitot probes. Regarding supply of replacement probes 0851HL, EASA has been informed that no problems are expected.

EASA is not aware of any reported in-service icing events for the 0851HL probes on the A320 family fleet for the last years and does not understand the comparison to the “current icing condition events” history that lead to the mandatory replacements.

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

Commenter 2: Air Canada – Jacques Marcoux – 05/09/2015

Comment # 2

BACKGROUND: AD 2014-0237R1 was issued to have the THALES PITOT probes p/n C16195AA and p/n C16195BA replaced by UTAS PITOT probes p/n 0851HL. Compliance for completion was 12 November 2018. We were planning to start the modification next month. This modification was to be done during scheduled C check and would have been completed with 24 months, about one year before the initial compliance date. Now the PAD (and coming new AD) will reduce the compliance date from 12 November 2018 to 12 November 2016. With this new compliance date, we will no longer be able to modify all aircraft during scheduled C check but we will have to have about half of the fleet modified during line maintenance visit which will put a major burden on our operations. The reason being that a full range leak check have to be carried following the three PITOT probes replacement which is not suitable in a line maintenance environment. If any leak are found during the full range leak check, extensive troubleshooting is required and will likely cause flight delay or cancellation.

We have some comments about PAD 15-115.

The AD 2014-0237R1 is for the replacement of THALES PITOT p/n C18195AA and p/n C16195BA. We know that p/n C16195BA was redesigned and is an improved model over the p/n C16195AA.

In the PAD, it is mentioned that the compliance date is reduced following further analysis and risk assessment. We do not have access to the data used for the additional analysis and do not know if the risk assessment is the same for both p/n C16195AA and C16195BA.

However, would the EASA and AIRBUS consider to reduce the compliance date, as required, but to have two different compliance dates. One for the older PITOT p/n C16195AA and one for the improved PITOT p/n C16195BA as follows:

- For PITOT p/n C16195AA: 24 month after 12 November 2014 [the effective date of EASA AD 2014-0237] (new compliance as per PAD 15-115).
- For PITOT p/n C16195BA: 24 month after the effective date of the new AD to be issued (new compliance lower than AD 2014-0237 but a bit higher than the PAD 15-115).

This would meet the intent of AIRBUS and EASA to reduce the compliance date but will give more flexibility for airlines which only have the improved PITOT p/n C16195BA installed like ACA.

Again, safety must be the first consideration but splitting the compliance date as we suggest, would make a tremendous difference for airlines in the implementation of this new safety requirement.

EASA response:

Comment understood, but not agreed. The relevant icing events history for the Thales probes C16195AA does not differ significantly due to the heater reliability improvements introduced with C16195BA. Therefore no additional credit can be justified for the C16195BA.

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

Commenter 3: Lufthansa Technik AG – Thomas Dauer – 08/09/2015

Comment # 3

As in the previous AD 2014-0237, new PAD 15-115 lists numerous older requirements. These older requirements have been subject of former ADs. The compliance limit of these old ADs was over years ago when AD 2014-0237 was issued.

Including these old requirements into the new AD would again cause a lot of additional work for the operators/MROs with respect to the assessment of the AD because all of these old requirements would have to be commented again.

Therefore, LHT would appreciate if the new AD would not refer to any former requirements/ADs or at least reduce these references to a minimum.

EASA response:

Comment understood, but not agreed. Previous requirements are 'retained' as EASA cannot determine – nor can Airbus provide proof – that all those actions have been accomplished. If accomplished (e.g. previous AD recorded as completed – simple administrative records check) then no 'additional work' exists for operators/MRO to do. This is a commonly understood and applied practice for ADs (not only by EASA) and should not lead to in-service difficulties. Nevertheless, EASA concurs that such 'retention' of previous requirements should be kept to a minimum.

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

Commenter 4: S 7 Engineering LLC – Sergei Stepanenko – 15/09/2015

Comment # 4

Siberia Airlines (SBI) currently operates 42 A320 Family aircrafts equipped with affected pitot probes. From our point of view new compliance time “Within 24 months after 12 November 2014” specified in EASA PAD 15-115 Item (2) is not optimal. SBI would like suggest to save compliance time 24 months but count it from the date of issuance proposed EASA AD. Our argument based on better performance of pitot probes replacement. Heavy maintenance check in this case looks like preferable.

EASA response:

Comment understood, but not agreed. See EASA answer to Comment #2.

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