



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-021

[Published on 04 February 2016 and officially closed for comments on 03 March 2016]

**Commenter 1: Etihad Airways – Borja Dosal Roiz – 05/02/2016**

### **Comment # 1**

In paragraph (2.1):

- a) When “SEC SW standard 126” is mentioned we recommend adding the respective software P/N by which is identified “P/N B372CAM0104”.
- b) This paragraph applies to aeroplanes that has received Airbus mod 39429 (installation of SEC hardware C) in production. But, it is our understanding that the installation of SEC hardware C can also be done thru retrofit. If this is the case, we recommend the paragraph to be revised in order to take into account those aeroplanes modified thru retrofit.

### **Comment # 2**

In paragraph (3) it is stated “mod 161208”. For better understanding of the reader we recommend to add the description of this mod “Installation of SEC software standard 126”.

### **Comment # 3**

In paragraph (5) the statement “an affected SEC SW standard, or a SEC hardware C hosting an affected SEC SW standard” seems redundant, because the only SEC hardware standard that can host the affected SEC SW standard is SEC hardware C. We recommend to simply state “an affected SEC SW standard”.

### **EASA response:**

**Comment #1a – Comment agreed. The Final AD was updated accordingly**

**Comment #1b – Comment not agreed. An aeroplane with SEC Hardware C installed as retrofit is managed under paragraph 2.2 of the AD**

**Comment 2 – Comment agreed. The information was added in the Reason section of the Final AD**

**Comment 3 – Comment not agreed.**

**No changes have been made to the Final AD in response to comments #1b and 3**



**Commenter 2: Jetstar Airways Pty Limited – Hiroaki Fujita – 08/02/2016 & 18/02/2016 & 24/02/2016****Comment # 4**

Column of (2) of Required Action(s) and Compliance Time(s) on EASA AD 2015-0191 is shown below sentence:

“allows removal of the AFM TR as required by this AD for that aeroplane”

JJP believed that the sentence means to remove the AFM TR as our convenience time after the modification. But column of (4) of Required Action(s) and Compliance Time(s) on EASA PAD 16-021 is changed like as below sentence:

“After modification of....., remove Airbus AFM TR 572 issue 1, ....”

JJP believed that this sentence means to remove the AFM TR until next flight after the modification.

1. Could you please clear for our comment?
2. If possible, could you please change sentence that we can remove the AFM TR as our convenience time after the modification?

**Comment # 5**

JJP concern that the PAD is not clear what to do for aeroplane modified to software standard 126 of SEC C in service.

So JJP have below comment.

For column (1) of “Required Action(s) and Compliance Time(s)”;

It shown “an affected SEC SW standard”.

But it is not clear in the column.

Could you please change the sentence like as below?(Same as EASA AD 2015-0191)

“For aeroplanes equipped with SEC hardware C P/N B372CAM0100 with software standard 122, 124 or 125 (P/N B372CAM0101, P/N B372CAM0102 or P/N B372CAM0103) on...”

**Comment # 6**

For column (3) of “Required Action(s) and Compliance Time(s)”:

This column means statement of no affected aeroplane for requirement of paragraph (2) of this AD. But it is not clear what to do for modified aeroplane to SEC STD 126 in service. So JJP proposed to change below sentence:

“An aeroplane on which SEC SW standard 126 have been installed (Airbus MOD 161208 applied in production, or modified in service in accordance with the instruction of Airbus SB A320-27-1252) is compliant with the requirements of paragraph () of this AD, provided it is determined that no affected SEC SW standard is installed on that aeroplane.”



**Comment # 7**

JJP believed that the PAD need to have column (5.3) with below contents.

(5.3) It is allowed to install SEC hardware C (P/N B372CAM0100) with affected SEC SW standard, provided that, before next flight after installation, or, for aeroplanes not yet modified as required by paragraph (2) of this AD, within the applicable compliance time as specified in paragraph (2) of this AD, SEC SW standard 126 is uploaded (or later software – see paragraph (6) of this AD).

Because we can't install SEC C with affected software if we can upload SEC C standard 126 on ship.

Installation procedure of SEC on AMM is included software loading procedure if there are not match software part number between component and media diskette.

So we can upload latest one every time when replace SEC C.

**EASA response:**

**Comment #4: Comment not agreed. The AFM has to be consistent with actual aeroplane configuration. After installation of SEC SW standard 126, the AFM TR 572 issue 1 has to be removed.**

**Comment #5: Comment noted: The definition of “affected SW standard” is provided in the Reason of the AD; the “Required Action and Compliance Time” (RACT) is supposed to be read in the light of the information provided in the Reason. Anyway, to improve readability, Paragraph (1) of the RACT has been updated.**

**Comment #6: Comment not agreed: An aircraft that has been modified in accordance with Airbus SB A320-27-1252 is addressed by paragraph 2.1 and by the general sentence “unless accomplished previously”**

**Comment #7: Comment not agreed: the installation on an aeroplane of a SEC hardware C with an affected SW Standard, followed by SW standard 126 uploading accomplished before aeroplane release to service has to be considered as a SEC hardware C installation with SW 126 standard.**

**No changes have been made to the Final AD in response to these comments**

**Commenter 3: Cathay Pacific Airways Limited – Dicky Or – 11/02/2016**
**Comment # 8**

CPA/HDA has reviewed PAD 16-021 with following comment:

It is noted that SBIT 16-0001 was issued to notify typing errors in SB 27-1257, which will be corrected in next SB revision but not scheduled yet. Since PAD 16-021 para (2.2) requires the inspection to be done in accordance with SB 27-1257, could EASA clarify the typing errors in the AD which requires deviation from the SB instruction?

**EASA response: Comment agreed. SEC P/N mentioned in the AD are the correct ones. A Note has been added in the Final AD.**

