



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-092

[Published on 22 June 2016 and officially closed for comments on 20 July 2016]

Commenter 1: ANA – Yuki Iwama – 30/06/2016

Comment # 1

ANA has an impression that the REF./A/ (4), (5), (6) and (7) should exempt paragraph (2), in addition to the "paragraphs (1) and (3)" because (2) is related to the paragraph (1) .

(4), (5), (6) and (7) in the REF./A/ should be as follows:

Original : ... paragraph (1) and (3) ...

Should be: ... paragraph (1), (2) and (3) ...

EASA response:

Comment noted: depending on APU ECB P/N, an aeroplane may be not affected by the inspection and cleaning requirements (Paragraph (1) and (3) of the AD). Consequently, EASA concur that, as noted by the commenter, the corrective actions as described in para (2) will never be required on those aeroplanes. It should be noted, anyway, that paragraph (2) may be not applicable depending on the results of the inspection, but not depending on APU ECB P/N installed on board. Paragraph (4), (5) and (7) have been modified accordingly.

Commenter 2: Virgin America – Krista Dial – 14/07/2016

Comment # 2

The PAD is silent when listing Service bulletins (in paragraph 6 NOTE) for installation of the 3888394-321206 ECB, thusly eliminating the 3888394-321206 ECB from retrofit in compliance with the forthcoming AD.

It is noted that paragraph (7) of the PAD will cover future ECB PN rolls, however the 3888394-321206 ECB is already approved, so does fall under paragraph (7).



Airbus has informed Virgin America that only a Honeywell VSB 131-49-8196, will be available in August, and is the retrofit document for the 3888394-321206 ECB. As this Honeywell VSB is not yet available, we are submitting this comment to highlight the fact that the 3888394-321206 ECB has been delivered via production MOD 157848, however there will be no compliant manner in which it can be retrofit to in service aircraft.

EASA response:

Comment understood. P/N 3888394-321206 is listed in Appendix 1 of the AD as P/N not affected. Its installation in accordance with Airbus approved modification instructions constitutes terminating action for the repetitive inspections and cleaning as required by paragraphs (1) and (3). The NOTE provides a list of SB available at the issue date of the AD. Anyway, any other Airbus SB, even issued after the effective date of the AD, is acceptable to comply with para (6) of the AD, being “an Airbus approved modification instruction”. The Note has been modified to clarify this point.

Commenter 3: Cathay Pacific Airways – Jacky Kwong – 18/07/2016

Comment # 3

We need further clarification from EASA on AD Compliance when new ECB P/Ns are introduced – Refer to AD Para (4) & (7)

What is the control mechanism when new ECB P/Ns are introduced? Will this AD be revised to reflect the latest ECB standard?

As an operator, we prefer NOT to revise the AD every time when new P/Ns introduced since it will give big trouble to operator in terms of AD compliance (e.g. complicated process to demonstrate AD compliance, etc...)

We would recommend EASA to revise the wording on AD Para (4) as follow:

“An aeroplane equipped with any of the APU ECB Part Number (P/N) or latest standard as listed in Appendix 1 of this AD is not affected by the requirements of paragraph (1) and (3) of this AD.”

OR

““An aeroplane not equipped with any of the APU ECB Part Number (P/N) as listed in Appendix 2 of this AD is not affected by the requirements of paragraph (1) and (3) of this AD.”

EASA response:

Comment understood. The AD will not be revised when new APU ECB P/N will be available. These new P/N are addressed by paragraph (7). Paragraph (7) of the AD has been modified to further clarify that an aeroplane equipped with a later standard of APU ECB is not affected by the inspection and cleaning requirement of the AD.



Commenter 4: United Airlines – Todd Hayes – 19/07/2016**Comment # 4**

United Airlines has reviewed the proposed rulemaking and have no objections to the proposed rule.

EASA response: Comment noted. No changes have been made to the Final AD in response to this comment

