



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-004

[Published on 15 January 2018 and officially closed for comments on 12 February 2018]

Commenter 1: Cham Wings Airlines – Roman Dolgoplov – 16/01/2018

Comment # 1

After reviewing PAD 18-004, I would be thankful, if you clarified some points for us:

A) First of all, requirement:

Within the compliance time specified in Table 1 of this AD, amend the applicable AFM by incorporating the procedure as specified in Appendix 1 of this AD, inform all flight crews, and, thereafter, operate the aeroplane accordingly.

The part marked in bold has been prescribed for us as for an operator or for the manufacturer, Airbus? Are we authorized to amend documents issued by manufacturer?

B) In our AFM we have procedure for ADR 1+2+3 FAULT in abnormal procedure section (please find attached), so should we transfer it to Emergency procedure?

C). Also ADR 1+2+3 FAULT procedure is available in QRH, FCOM. So, if the procedure has been amended, can it contradict FCOM/QRH?

D). And in general, what was the reason of issuance of this amendment for AFM, because it has been already incorporated in FCOM, QRH?

EASA response:

A) The AD requires and authorizes an operator of an aeroplane to update the AFM applicable to that aeroplane. In addition, the required procedure to be inserted has been elaborated by the aircraft manufacturer and will be incorporated at the next AFM revision opportunity. The AD requirement and compliance time allows increasing the 'responsiveness' of the required safety measure.

B) The AD requires updating the AFM including the emergency procedure "NAV – ADR 1+2+3 FAULT". NAV ADR 1+2+3 FAULT and ADR1+2+3 FAULT are two different procedures. The AD concerns only the ECAM procedure NAV ADR1+2+3FAULT. This ECAM procedure is available only for aircraft fitted with BUSS/Air Data Monitoring/Reversible BUSS. For information the ADR1+2+3FAULT paper procedure is available only for aircraft not equipped with BUSS/Air Data Monitoring/Reversible BUSS.

C) There is no contradiction – ref answer to comment 1B.



D) Refer to the answer to comment 1B. The aim of this AD is to ensure that operators have updated their AFM with the March revision or any subsequent AFM revision.

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

Commenter 2: Company name – N/A – Ammar Kiwan – 27/01/2018

Comment # 2

Regarding to EASA PAD No. 18-004, I think it's big fault to say in the end of this PAD:

Ref. Publications:

Airbus A318, A319, A320 and A321 AFM Revision dated 07 March 2017.

The use of later approved revisions of the above-mentioned document is acceptable for compliance with the requirements of this AD.

There might be a fault in the AFM customization even later than 07 March 2017 (maybe this procedures will not be found in the AFM later revision).

I have faced this problem, therefore I suggest to put after this phrase that even your AFM later revision (you must check for the existence of the procedures).

EASA response:

Comment not agreed:

As a general rule, an AD is not intended to prevent possible editorial errors in Airbus AFM customisation process. Your comment will be brought to aircraft manufacturer attention.

