

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-115

[Published on 02 July 2019 and officially closed for comments on 16 July 2019]

Commenter 1: Textron Aviation – Robert L. Ramey – 12/07/2019

Comment # 1

- A. The PAD references the Collins Aerospace documents to comply with EASA required corrective action items. However, the PAD does not take into consideration the installation of the FDSA-6500 software that was installed in production at Textron Aviation under authority of TCDS EASA.IM.A.277 and EASA.IM.A.503 nor the Textron Aviation corrective action documents. The production aircraft serial numbers affected by this TCAS non-compliance are:

MODEL	SERIAL NUMBERS
Super King Air B200GT	BY-207, BY-239, BY-250 thru BY-364
Super King Air B200CGT	BZ-1
Super King Air B300	FL-954, FL-1010, FL-1031 thru FL-1203
Super King Air B300C	FM-66 thru FM-83

Please note that EASA does not require TCAS II for aircraft under 5,700kg and that the C90GTi Pro Line Fusion© production aircraft are not equipped with TCAS II.

In response to Collins' OPSB, Textron Aviation published Temporary Changes to the AFMs for the aircraft listed above to invoke a limitation requiring operation in TA mode only. These AFM Temporary Changes were published in April 2019 and are applicable to all production delivered aircraft with Pro Line Fusion under the authority of the TCDS (serial numbers listed above) and not the STC. The AFM Temporary Changes are:

- Textron Aviation B200GT/B200CGT Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Temporary Change 434-590168-0003BTC4 dated April 2019.
- Textron Aviation B300/B300C Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Temporary Change 434-590169-0003BTC1 dated April 2019.
- Textron Aviation B300/B300C Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Heavy Weight Airplanes Temporary Change 434-590170-0003BTC1 dated April 2019.



Collins Aerospace completed STC SA01922WI to support SIL FDSA-6500-19-1 which installs the replacement FDSA-6500 software as a corrective action to the TCAS II non-compliance where the TCAS Fly-To Cue indication on the primary flight displays may conflict with other TCAS system information during a Resolution Advisory Scenario. Textron Aviation is in the process of a certification project (FAA Project Number TXTAV-112308-A) to in-draw the STC SA01922WI into the type certification of the B200GT, B200CGT, and B300 series aircraft. Once this project is completed, Textron Aviation will publish Service Bulletin MTB 34-02 to provide approval and instructions on installing the replacement FDSA-6500 software. Textron Aviation will also publish new Temporary Changes to the AFMs to remove the “TA mode” only limitation if MTB 34-02 or STC SA01922WI are installed. These new Temporary Changes will supersede the Temporary Changes published in April 2019 as per the table below:

Temporary Changes Published in April to invoke TA Mode Only limitation	Superseded by:
434-590168-0003BTC4	434-590168-0003BTC6
434-590169-0003BTC1	434-590169-0003BTC2
434-590170-0003BTC1	434-590170-0003BTC2

Textron Aviation anticipate FAA and EASA approval of project TXTAV-112308-A in July 2019. The production aircraft that will include the installation of the revised FDSA-6500 software to remedy the TCAS II non-compliance are FL-1204 and after, FM-84 and after, BY-365 and after, and BZ2 and after.

Textron Aviation kindly requests the following:

- B. Remove C90GTi aircraft serial numbers LJ-2129 and after from the “Aeroplanes modified on the production line” list.
- C. Include AFM Temporary Changes 434-590168-0003BTC4, 434-590169-0003BTC1, 434-590170-0003BTC1, 434-590168-0003BTC6, 434-590169-0003BTC2, and 434-590170-0003BTC2 as an alternate means of compliance rather than installing Collins’ OPSB 0193-19 for aircraft serial numbers FL-954, FL-1010, FL-1031 through FL-1203, FM-66 through FM-83, BY-207, BY-235, BY-250 through BY-364, and BZ-1 to the “AFM” corrective action item 1 of PAD 19-115.
- D. Include Service Bulletin MTB 34-02 and AFM Temporary Changes 434-590168-0003BTC6, 434-590169-0003BTC2, and 434-590170-0003BTC2 as an alternate means of compliance for aircraft serial numbers FL954, FL-1010, FL-1031 through FL-1203, FM-66 through FM-83, BY-207, BY-235, BY-250 through BY-364, and BZ-1 to the “Modification” corrective action item 2 of PAD 19-115.
- E. Add the following Textron Aviation Documents to the Reference Documents in PAD 19-115.

Textron Aviation B200GT/B200CGT Pilot’s Operating Handbook and FAA Approved Airplane Flight Manual Temporary Change 434-590168-0003BTC4 dated April 2019;

Textron Aviation B300/B300C Pilot’s Operating Handbook and FAA Approved Airplane Flight Manual Temporary Change 434-590169-0003BTC1 dated April 2019;



Textron Aviation B300/B300C Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Heavy Weight Airplanes Temporary Change 434-590170-0003BTC1;

Textron Aviation B200GT/B200CGT Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Temporary Change 434-590168-0003BTC6 dated July 2019;

Textron Aviation B300/B300C Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Temporary Change 434-590169-0003BTC2 dated July 2019;

Textron Aviation B300/B300C Pilot's Operating Handbook and FAA Approved Airplane Flight Manual Heavy Weight Airplanes Temporary Change 434-590170-0003BTC2 dated July 2019; and

Textron Aviation Mandatory Service Bulletin MTB 34-02, Navigation – FDSA Software Update.

- F. Add Textron Aviation email teamturboprop@txtav.com for any information relating to MTB 34-02 to item number 4 in the "Remarks" section of PAD 19-115.

EASA response:

- A. Comments noted and partially agreed. The AD Applicability refers to the equipment and states that** "These are installed in service by the referenced STCs, or **in production** by Pro Line Fusion© integrated system. For the **affected aeroplanes to which this AD applies, see Appendix 1** of this AD". **As a consequence, the AD applies to all aeroplanes with that equipment installed. Appendix 1 does identify the affected aeroplanes by serial number (s/n). The s/n ranges have been amended in the Final AD, Appendix 1, as requested.**
- B. Comment agreed. The Model C90GTi has been removed from Appendix 1 of the Final AD.**
- C. Comment agreed. The Final AD has been amended to add Appendix 2, listing the applicable AFM TC.**
- D. Comment agreed. The Final AD has been amended accordingly.**
- E. Comment agreed. The Final AD has been amended accordingly.**
- F. Comment agreed. The Final AD has been amended accordingly.**

