

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-146

[Published on 26 July 2019 and officially closed for comments on 09 August 2019]

Commenter 1: Emirates – David Lapesa Barrera – 28/07/2019

Comment # 1

In regards PAD 19-146 related to AOT A36R002-19, as per consultation with Airbus, it is concluded that CMR 361100-00001-1-C will be deleted through a dedicated ALS Part 3 Variation while the instructions of AOT A36R002-19 will remain applicable and mandatory through AD. Both PAD and AOT lead to confusion by stating that the CMR task interval is reduced from 12500 FH to 9000 FH.

Therefore, we kindly request you to:

1. Coordinate with Airbus for the publication of the ALS Part 3 Variation cancelling the CMR,
2. Coordinate with Airbus for the revision of the AOT to clarify that the CMR is cancelled though the ALS Part 3 Variation, and
3. State the cancellation of the CMR and the adoption of the AOT inspection requirements in the PAD.

EASA response:

Comment agreed. The Final AD has been amended to specify that, once the new CMR task is implemented through the AOT (as required by the AD), the current ALS Part 3 CMR task 361100-00001-1-C can be discontinued. It is expected that the next revision – or a Variation – of ALS Part 3 will reflect the new CMR task.

Commenter 2: British Airways Engineering – Matt Dennis – 30/07/2019

Comment # 2

- A. The PAD states the CMR task 361100-00001-1-C time-interval needs to be reduced from 12,500 FH to 9,000FH. Although the text summarises the new inspection/function tests, it does not make it clear that the existing CMR task (pressure sensor replacement) is superseded by the new tasks. Can you please clarify in the text that the existing CMR tasks is now superseded by this AD?



- B. The AOT states the terminating action will be embodiment of EBAS S/W Std 6.5.1. However, there is no terminating action listed in the PAD. Please confirm the AD will be up-issued / superseded in a short time-frame when the terminating mod is available?

BAW would like to ensure the tasks mandated by the AD will not need to be completed if the EBAS S/W can be embodied.

EASA response:

A. Comment noted and partially agreed. At the time of PAD issuance, the EBAS S/W standard 6.5.1 was not yet approved and the SB to introduce that S/W change is not expected to be published until September 2019. No changes have been made to the Final AD in response to this comment.

B. Comment agreed. See EASA answer to Comment # 1 above.

EASA plans to issue a new AD to require the introduction of EBAS S/W standard 6.5.1, which will constitute terminating action for the CMR task as required by the current AD. The new AD will retain the requirements of the current AD, which will then be superseded.

Commenter 3: Emirates Engineering – Paul C. Runes – 05/08/2019

Comment # 3

- A. For engines or EBAS pressure sense lines installed within 4 months after the effective date of the associated AD, but after the initial inspection/functional check as per AOT A36R002-19, is it required to carry out **again** Subtask A and **D** of the AOT? If yes, what is the latest date by which said subtasks need to be performed again?
- B. For engines or EBAS pressure sense lines installed after 4 months from the effective date of the AD, on aircraft that has already accumulated 9000 flight hours or more since SB 36-8037 or 8038 embodiment, is it required to carry out **again** Subtask A and **D** of the AOT and if so, when should this subtasks be performed (e.g. before the next flight following engine or sense line installation)?
- C. Does accomplishment of AOT A36R002-19 supersede the requirement of CMR task 361100-00001-1-C as currently published in the ALS?

EASA response:

A. Comment noted. Since a new AD will be published soon, requiring installation of EBAS software standard 6.5.1 – see also EASA answer to Comment # 2 above – the scenario as provided by the commenter is not likely to occur.

B. See EASA answer to point A above.

C. Comment agreed. See EASA answer to Comment # 1 above.

No changes have been made to the Final AD in response to points A and B of this comment.



Commenter 4: ALL NIPPON AIRWAYS – Kenji Inagaki – 07/08/2019
Comment # 4

All Nippon Airways (ANA) received EASA PAD No.19-146. This PAD shows that Terminating Action is None, however related AOT A36R002-19 mentions that "This CMR task will be cancelled by the introduction of the new EBAS software S6.5.1 planned for end of 2019". Furthermore Airbus Technical Follow-Up (TFU) Ref:36.11.00.108 shows SB 36-8062 which introduce new EBAS SW S6.5.1 will be released in Sep 2019.

ANA would like EASA to revise the terminate action when releasing AD.

Is: None

Will be: New EBAS SW S6.5.1 introduction

EASA response:

Comment noted. See EASA answer to Comment # 2 above.

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

Commenter 5: Lufthansa Technik AG – Olivier Martin – 07/08/2019
Comment # 5

This PAD and the AOT A36R002-19 it is referring to are requesting to modify the CMR Task 361100-00001-1-C for the A380. In the frame of the OEB 19, it has always been communicated that an update of the EBAS software to the on-coming latest standard would cancel this CMR.

Airbus has informed today the operators that this EBAS software standard 6.5.1 will be finally available in the end of August. That means that the Software can be implemented before the deadline of 31.12.2019 for the first execution of the CMR Task, and the CMR Task can be deleted after the software standard is implemented.

This is why Lufthansa is suggesting to include the EBAS Software 6.5.1 in the AD as Terminating Action for the CMR Task and associated AOT.

EASA response:


Comment noted. See EASA answer to Comment # 2 above.

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

Commenter 6: Lufthansa Technik AG – Armin Bayer – 08/08/2019

Comment # 6

AOT A36R002-19 describes that CMR task 361100-00001-1-C is cancelled by the AOT. From the formal aspect Airbus confirmed that an AOT is not empowered to supersede an ALS Part 3 requirement. This is why Lufthansa is suggesting to include the cancellation of CMR task 361100-00001-1-C into EASA PAD No 19-146 and final EAD.

EASA response:

Comment agreed. See EASA answer to Comment # 1 above.

