

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-190R2

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Commenter 1: Sabena Aerospace – Olivier Van Heuverswyn – 28/01/2020

Comment # 1

Ref /a/ EASA PAD 19-190R2 issued on 28 January 2020.

Ref /b/ Airbus SB A330-27-3222 original issue dated 16 February 2017 or Revision 1 dated 9 January 2019.

Ref /c/ Airbus SB A330-27-3235 original issue dated 21 May 2019.

Ref /d/ Airbus SB A330-27-3236 original issue dated 04 October 2019.

Ref /e/ EASA PAD 19-190R1 issued on 18 October 2019.

Today, 28 Jan 2020, Sabena Aerospace took notice of ref/a/ EASA PAD. Reason for revision; to introduce ref /b/ SB and ref /c/ SB in ref /a/ EASA PAD.

The Aim of ref /a/ EASA PAD and later EASA AD is to mandate the activation of the Stop Rudder Input aural Warning (SRIW) device. One of the criteria to enable the SRIW function is the FCPC upgrade iaw ref /d/ SB (FCPC 2K2 upgrade to P15A/M24A). Concurrent requirements for ref /d/ SB is the application of ref /b/ SB or ref /c/ SB. Note that the concurrent requirements are clearly stipulated in ref/d/SB and for this reason, SNAe is wondering why ref /e/ EASA PAD has been revised.

EASA response:

Comment noted. In general, concurrent requirements specified in an SB, to apply one or more other SBs, are not necessarily required by an AD, unless mentioned explicitly in that AD as 'required'. In this specific case, the PAD was revised (R2) to introduce 2 concurrent requirement SBs (ref /b/ and ref /c/ above) which must be accomplished as it was determined that they are necessary as additional requirements.

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

