

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-054

[Published on 20 March 2020 and officially closed for comments on 17 April 2020]

### Commenter 1: Air China/Ameco – Wang Jun – 31/03/2020

#### Comment # 1

As you know fix ELT PN 01N65900 is installed on some of Air China A319/A320/A321 aircrafts on production and on some of A319 aircraft via DGAC STC 180-SF-0213 after delivery.

PAD mentions that Airbus SB A320-25-1BQP/-1BQN is mandatory requirement for fix ELT PN 01N65900 installed on A319/A320/A321 aircraft on production.

Would you mind to clarify if there is any mandatory requirement for fix ELT PN 01N65900 installed on A319/A320/A321 aircraft via STC?

#### EASA response:

*Installation of ELT P/N 01N65900 accomplished with STC, or any modification other than the Airbus ones, may or may not be affected by the unsafe condition addressed by this AD. The design approval holder (DAH) of that STC/modification is expected to review its installation and identify whether additional actions are required, or if its installation can be proposed as AMOC to this AD. If additional action is required, and has not yet been accomplished on affected aeroplanes, a new AD action may be required, addressed to those aeroplanes having that STC/modification embodied.*

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

### Commenter 2: Aeroconseil – Caroline Hazebrouck – 14/04/2020

#### Comment # 2

As per the regulatory surveillance activity, this PAD has been reviewed by my Airworthiness Office.

The result shows that Aeroconseil has developed a change to install this part number of ELT “Automatic Fixe” PN 01N65900 on Airbus single aisle also.



As per Part 21.A.265 - Obligations of the Holder, Aeroconseil is required to correct this potential unsafe features.

You should probably know of a number installations, on Airbus Single Aisle aircraft, where the ELT ADT 406AF P/N 01N65900 was installed by other DOAs (Third Party DAHs), as this ELT of ELTA is very common on Large Aeroplanes.

Therefore, my concern is about how the EASA intends to address this issue for them?

Is a further AD may be foreseen to cover this “Third Party DAHs” in order to provide to operators the relevant Service Bulletin information to modify their aircraft accordingly

If not acceptable for you, what is your recommendation for us to address this topic?

From our side, all potential A/Cs are identified and reference of SB (called ATI within Aeroconseil DAS) for correction instructions can be released upon request.

**EASA response:**

**See EASA answer to comment 1**

**Commenter 3: ECA Group – Claude Cresp – 21/04/2020**

### **Comment # 3**

Indeed we worked and support actively AIRBUS on this matter (issuance of their SB) in the past months .

We did perform many test and the safety concern is directly linked to the AIRBUS integration where the A/C harness used is mixing A/C power supply, such as +115 Vac and +28 Vdc, and low power signals (data) required to perform the connection between the cockpit Remote Control Panel and the ELT located AFT.

Such A/C power supply are not necessary to the operation of our ELT (standalone equipment), and so such potential risk cannot exist if such “mixing” is not possible.

So for us, following a correct safety analysis, the mandatory implementation of the protection diode may not be necessary for some A/C of group 2.

Is there a way to transfer officially to EASA such information, and if the answer is YES how can we do?

We are thinking to issue an SIL to our potential customers asking them to check such point.

**EASA response:**

**See EASA answer to comment 1**

