

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-011

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### Commenter 1: Delta Air Lines – James Thompson – 22/02/2021

#### Comment # 1

##### Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 21-011, dated 02 February 2021

(B) Airbus Service Bulletin (SB) A350-31-P040

(C) Airbus A350 Airplane Flight Manual (AFM) Temporary Revision (TR) 126 Issue 1

1) Upon reviewing the “AFM Amendment” paragraph of the “Required Action(s) and Compliance Time(s)” section of Ref. (A), it was noted that incorporation of Ref. (C) is required within 90 days after the AD effective date and accomplishment of Ref. (B) is required within 8 months after the AD effective date. During the time period between incorporation of Ref. (C) and accomplishment of Ref. (B), it is possible that flight crews will encounter discrepancies between the procedures displayed on the ECAM and the procedures stated in the AFM.

While the language in the “Required Action(s) and Compliance Time(s)” section of Ref. (A) implies that the procedures stated in the AFM after incorporation of Ref. (C) should prevail over the procedures displayed on the ECAM before accomplishment of Ref. (B), there is no explicit guidance given on which procedures should prevail if a discrepancy is encountered. Without this explicit guidance, it may be unclear to some operators which procedures the flight crew should follow if there is a discrepancy between the AFM procedures and the procedures displayed on the ECAM, possibly leading to the use of incorrect procedures. The use of incorrect procedures could potentially result in the occurrence of the failure condition Ref. (A) was issued to address.

Therefore, to ensure the correct procedures are used by flight crews, DAL requests the addition of a note to the “AFM Amendment” paragraph of the “Required Action(s) and Compliance Time(s)” section of Ref. (A) to clarify that the AFM procedures should prevail over the procedures displayed on the ECAM if a discrepancy is encountered.

2) Upon reviewing the “Modification” paragraph of the “Required Action(s) and Compliance Time(s)” section of Ref. (A), it was noted that installation of ATQC V3 for FWS SW STD 6/2.0 in accordance with Ref. (B) is required within 8 months after the AD effective date. However, there are no provisions regarding subsequent ATQC versions for FWS SW STD 6/2.0. As the “Required Action(s) and Compliance Time(s)” section of Ref. (A) is currently written,



operators could not install any ATQC version for FWS SW STD S6/2.0 released by Airbus after ATQC V3 has been installed without requesting and receiving approval of an alternative method of compliance.

Airbus may release multiple ATQC versions for the same FWS software standard, with each subsequent ATQC version being the next evolution of the ATQC and encompassing the improvements introduced in the previous ATQC version(s). As such, subsequent ATQC versions for FWS SW STD 6/2.0 would maintain compliance with the ATQC V3 improvements. Additionally, each new ATQC version for a given FWS software standard cannot be installed unless all prior ATQC versions for the same FWS software standard have previously been installed, since the last ATQC installed replaces the previous ATQC.

Therefore, to prevent the need for operators to request approval of an alternative method of compliance to install later ATQC versions for FWS SW STD 6/2.0 after ATQC V3 has been installed, DAL requests that the “Modification” paragraph of the “Required Action(s) and Compliance Time(s)” section of Ref. (A) be revised to allow installation of later ATQC versions for FWS SW STD 6/2.0, if installation of the later ATQC version occurs after ATQC V3 and any other intermediate ATQC versions have been installed on the aircraft.

***EASA response:***

***1) Comment agreed. Final AD has been updated by adding following Note 1.***

***“Note 1: In case any discrepancy is identified between procedures displayed on the Electronic Centralized Aircraft Monitoring (ECAM) and procedures stated in the applicable AFM, the AFM procedures prevail.”***

***2) Comment noted, but as per Airbus procedure installation of ATQC V3 for FWS SW STD 6/2.0 will be a prerequisite for installation of any later ATQC versions. No changes have been made to the Final AD in response to this comment.***

