

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-054

[Published on 12 April 2021 and officially closed for comments on 10 May 2021]

Commenter 1: Cathay Pacific – Bharat Yadav – 06/05/2021

Comment # 1

1. Why is this AD actually required?

- a. The AISB A350-32-P037 referenced in the PAD was issued in July 2019.
- b. TFU 32.40.00.044 “BCS / WSCS improvement with new software BCS/WSCS S5B” was raised on 13 April 2021.

The reason for issue stated in the AISB, PAD and TFU are exactly the same even though these docs were issued years apart. Which then causes further confusion on the delayed issue of this PAD.

2. If this was a safety concern then why has it taken nearly 2 years for the AD to be issued. We believe that this AD is being used to drive operators in performing changes that are only “recommended” in the AISB.

Therefore, Cathay Pacific believes that this AD is not required due to any safety concerns but for reasons of a non-mandatory nature.

EASA response:

EASA confirms there is an unsafe condition, and the rectification of this unsafe condition has been managed to date using a monitored retrofit campaign. However in accordance with EASA’s policy contained in the continuing airworthiness of type design procedure (PR.CAP.00001-008), an AD shall be raised covering the affected aircraft if a monitored retrofit campaign is not completely successful. Note that affected operators that have already modified the aeroplane by installing serviceable software do not have any action on the aircraft, and need only to claim compliance with the AD.

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

