

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-140

[Published on 01 October 2021 and officially closed for comments on 29 October 2021]

Commenter 1: Eastern Airlines Technic CO.,LTD. – Dai longmin – 11/10/2021

Comment # 1

“AFM Change:

(4) For Group 1 aeroplanes: After modification of an aeroplane as required by paragraph (3) of this AD, the operational procedure of the AFM TR, as required by paragraph (1) of this AD, is no longer necessary and can be removed from the AFM of that aeroplane.”

Because the existing A350 AFM provided by Airbus is an electronic manual, according to the communication with Airbus, it is currently impossible for airlines to temporarily delete the AFM TR from the AFM of the designated aircraft that has been modified.

Could you please revise the EASA AD to relax the time limit for removing the AFM TR 121 ?

We suggest that EASA shall retain the requirement "For Group 1 aeroplanes: After modification of an aeroplane as required by paragraph (3) of this AD, the operational procedure of the AFM TR, as required by paragraph (1) of this AD, is no longer necessary", but removing the AFM TR 121 can be arranged for implementation after post Airbus SB A350-22-P016 on all airline aircrafts and receiving the latest AFM revision without the AFM TR 121 from Airbus.

EASA response:

Comment not agreed. There is no compliance time defined in the AD to “remove” the AFM TR once MOD 116233 is embodied.

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

Commenter 2: Cathay Pacific Airways Limited – Emmajame Tordera Sola – 14/10/2021



Comment # 2

We kindly request EASA to confirm that the attached FCOM RED OEB 8 Issue 1 is acceptable means to highlight the phenomenon and advise crew procedures in regard to the AFM TR (see attached TR121 Issue 1 for A350 a/c published since 2019).



AFM TR121
PLP-LETR.pdf



CX_A350_FCOM-OEB
_210702.pdf



AFM TR121_1
APPRO-TR.pdf

EASA response:

Comment noted. In order to limit the uncommanded FCU altitude change, a new temporary procedure was published in the flight operations documentation requesting to set the ALT knob ring to 100ft after each use:

- **OEB8 “AFS CP Altitude Knob Use”**
- **AFM TR121 issue 1 “AFS CP Altitude Knob Use”**

The AFM TR is the means of compliance which is mandated.

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

Commenter 3: British Airways PLC – Chris Wild – 18/10/2021
Comment # 3

1.

Paragraph (3) instructs to replace the ‘affected FCU’ with a ‘serviceable FCU’, and that this can be accomplished in accordance with the instructions of the applicable Aircraft Maintenance Manual. Paragraph (5) then prohibits installation of an ‘affected FCU’ onto an aircraft which has been ‘modified’ as required by paragraph (3).

As of the Sep 2021 revision of the A350 Line Maintenance documentation provided by Airbus, aircraft equipped with an ‘affected FCU’ have a ‘serviceable FCU’ listed in the Illustrated Parts Data (IPD) as an allowable spare part. Per the nomenclature of the Line Maintenance IPD (A350-A-00-61-



03-11001-018A-D), “when a part is installed as a spare, this does not change the recorded aircraft configuration”, and “when a part is indicated as a spare, this means that this PN replaces the item shown in the PN column without any conditions. Both parts are interchangeable”.

As the SB A350-22-P016 identifies the interchangeability of the ‘affected FCU’ and the serviceable FCU’ as being one-way-forward, should paragraph (3) identify SB A350-22-P016 as the primary means of modifying the aircraft by replacement of the FCU, as opposed to the Maintenance Manual? This will change the recorded configuration of the aircraft and respect the prohibition statement from paragraph (5).

2.

Paragraph (3) Note 1 states that the SB (A350-22-P016) provides instructions to modify an ‘affected FCU’, into a ‘serviceable FCU’. This SB is an airframe SB and modifies the aircraft, by means of removing an ‘affected FCU’ and installing a ‘serviceable FCU’, which is either a FCU that has been modified off aircraft, or an already post-mod spare FCU. The instructions to modify the FCU are contained within the equipment VSB (C31006A-22-005).

Should Note 1 in paragraph (3) instead refer to the VSB rather than the SB when making reference to the modification of the FCU?

EASA response:

1. Comment agreed. The Final AD has been amended to modify paragraph (3) as follows : “For Group 1 aeroplanes: Within 25 months after the effective date of this AD, replace the affected FCU with a serviceable FCU, in accordance with the instructions of the SB (see Note 1 of this AD). “

2. Comment partially agreed. Comment adjusted to say “Note 1: The SB also provides instructions to modify an affected FCU, replacing the optical encoders, into a serviceable FCU. This AD does not mandate the FCU modification, only the replacement of the FCU with a serviceable part.”

Commenter 4: Qatar Airways – Shadrack Baron – 26/10/2021

Comment # 4

From the referenced EASA PAD, the affected FCU Part Number is C31006AC01 only. However, from the recent revision 01 of SB A350-22-P016, we note that FCU standard 4 P/N C31006AB01 is also affected.

Kindly review and advise whether FCU std 4 Part Number C31006AB01 will also be included in the list of affected units in the EASA AD to be issued.





A350-22-P016 REV
01.pdf

EASA response:

Comment agreed. It is confirmed that FCU having P/N C31006AB01 is also an affected part. The Final AD has been amended to add P/N C31006AB01 to the 'affected FCU' definition. Furthermore, TC Holder issued revision 01 of SB A350-22-P019 to correct the issue.

Commenter 5: China Southern Airlines Co.,Ltd. – Matthew Ye – 26/10/2021

Comment # 5

For the "Affected FCU", on page 1 of 3, there is only FCU PN C31006AC01 affected. However, from my point of view, the FCU PN C31006AB01 should be also affected by this PAD, which could be also installed on A/C without MOD 116233.



A350-22-P016 REV
01.pdf

For your information, Airbus SB A350-22-P016 is also updated to Revision 01 to include the above FCU PN info., which is attached here. Would you please check and clarify this?

EASA response:

Comment agreed. See EASA answers to Comments #4 above.

