

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-002

[Published on 12 January 2022 and officially closed for comments on 09 February 2022]

Commenter 1: Air France – Abdourahmane Keïta – 14/01/2022

Comment # 1

A. The applicability of this AD listed only the NEO aircraft.

However, the appendix 1 of this AD listed the affected ELAC and some of these affected ELAC are installed on CEO aircraft (See below):

- 3945129112 (ELAC soft std L101 data loadable) (2CE1 SW1 & 2CE2 SW1);
- 3945128218 (ELAC L101 non data loadable) (2CE1 & 2CE2) ;

AFR thinks this can cause confusion and this needs to be clarified by mentioning if applicable to CEO aircraft or not ?

B. §4 of this AD requests to replace each affected ELAC with serviceable ELAC IAW instructions of SB (SB 27-1288).

ELAC L101 (PN 39459112 and 39458218) is listed as affected ELAC but installed on CEO aircraft. SB 27-1288 is only for NEO aircraft and not applicable to CEO aircraft.

AFR thinks the Appendix 1 must be changed and list only the ELAC affected for the NEO aircraft. A separate AD should be drafted for CEO aircraft by listing the affected ELAC.

EASA response:

Comments not agreed.

EASA confirm that CEO aircraft are not affected by the unsafe condition addressed by this AD.

The unsafe condition to exist considers both the ELAC standard installed and the aircraft model in which the ELAC is installed. All ELAC P/N listed in appendix 1 of this AD are eligible for installation on NEO a/c. Nevertheless those P/N are also eligible for installation on CEO a/c for which no unsafe condition has been determined according to this AD.

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

Commenter 2: Jazeera Airways – Mohd Zulidzham bin Mohd Arif (Zul) – 18/01/2022

Comment # 2

JZR has the following concerned regarding the EASA PAD 22-002's Requirement Paragraph (5):

1. JZR does not have the capability to customize the AFM. We use the AFM published by Airbus from AirbusWorld for operation.
2. JZR also does not have the capability for in-house MEL approval. The document will need to be submitted to Kuwait DGCA for each update.

Based on these, the requirement to update the AFM & MEL within 2 months after modification as per EASA PAD will cause a non-compliance to this AD and also burden the Airline to update the document.

My suggestion is for the operator to perform SB reporting via AirbusWorld after modification for compliance on the manual update.

EASA response:

Comment not agreed.

EASA determined that the AFM and MMEL have to be modified after the ELAC upgrade of the aeroplane.

As soon as an operator has reported to Airbus the implementation of the SB, the relevant AFM update will be issued to this operator.

Taking into account and to reduce the possible documentary burden on operators, the compliance time of the relevant AD requirement has been extended.

Commenter 3: ALL NIPPON AIRWAYS CO.,LTD. – Kyohei Takamizawa – 28/01/2022

Comment # 3A

Excerpt from PAD 22-002

AFM and MMEL Change:

(5) Within 2 months after modification of an aeroplane as required by paragraph (4) of this AD, remove the AFM TR, as required by paragraph (1) of this AD, and the instructions implementation of the MMEL TR, as required by paragraph (3) of this AD, from the AFM and MEL of that aeroplane, inform all flight crews, and, thereafter, operate the aeroplane accordingly.

Request



Please consider to change like this:

(5) For Group 1 aeroplanes: Accomplishment of modification as required by paragraph (4) of this AD allows the removal of the AFM TR, as required by paragraph (1) of this AD, and the instructions implementation of the MMEL TR, as required by paragraph (3) of this AD, from the AFM and MEL of that aeroplane, inform all flight crews, and, thereafter, operate the aeroplane accordingly.

Reason

We believe the TRs are operational restriction, so there should be no problem about applying the TRs even after the modification.

Comment # 3B

Also the time period, within 2 months after modification, is too strict for us to modify all aeroplanes and to remove TRs .

It is more realistic to eliminate the time period of, or at least, 6 months is my proposal.

EASA response:

3A) Comment not agreed.

EASA determined that the AFM and MMEL have to be modified after the ELAC upgrade of the aeroplane.

About the AFM modification, EASA consider the mandated design improvement robust enough to avoid adding any extra-check during a critical flight phase, as a Take-off can be.

About the MMEL modification, EASA consider that the mandated design improvement restores the safety level associated to the previous/original MMEL dispatch conditions (i.e. Integrated Stand-by Instrument System (ISIS) inop accepted under condition).

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

3B) See EASA answer to comment #2.

Commenter 4: American Airlines – Ben Niaki – 03/02/2022

Comment # 4

AAL notes that the PAD 22-002, Paragraph (5) requires the removal of the AFM TR, as required by paragraph (1) of this AD, from the AFM of that aeroplane, inform all flight crews, and thereafter, operate the aeroplane accordingly. AAL Flight Operations department has determined that the reinforced speed crosscheck at takeoff is advantageous as an additional safety check, and would like to keep the AFM TR in the AFM. As such, AAL kindly requests that EASA consider revising paragraph (5) to allow the AFM TR to be optionally kept in the AFM.



EASA response:

See EASA answer to comment #3A.

Commenter 5: Deutsche Lufthansa AG – Sören Warnke – 08/02/2022
Comment # 5

In context to the released PAD 22-002 Deutsche Lufthansa CAMO has the following comment:

We would like to note that the time requirement mentioned in paragraph 5 does interfere with the following OEM general recommendation for the embodiment of the operational documentations:

OEM OPERATIONAL recommendation as per Airbus FOT 999.0062/21:

“In the interim period, as the ELAC L103+ is not installed on all the impacted aircraft of the fleet, Airbus has no objection that operators keep the additional speed check with ISIS, on all the fleet, until the complete fleet is retrofitted with ELAC L103+. “

DLH would like to mention that we follow the Airbus recommendation and would like to remove the restriction as per paragraph 1 & 3 after the complete affected fleet is modified, as per FOT 999.0062/21.

However, due to our big affected fleet we do need more than 2 months for the modification of all affected A/C. And if the time requirement within the paragraph 5 will remain 2 months without further exceptions we cannot remove the required operation documentation in once on the entire affected fleet.

In that kind of scenario, we would need to update the operation documentation within a few steps for the affected fleet, before AD effective date.

We do believe that this kind of scenario does not improve the overall safety of flight operations. The induced split of non-affected and affected aeroplanes within the modification timeframe is bringing more complexity (diversity) within the aircraft operations.

Therefore, DLH would like to suggest a wording similar to this example:

AFM and MMEL Change:

(5) Within 3 months after modification an aeroplane as required by paragraph (4) of this AD, or within 3 months after the effective date of this AD, whichever occurs later, remove the AFM TR, as required by paragraph (1) of this AD, and the instructions implementation of the MMEL TR, as required by paragraph (3) of this AD, from the AFM and MEL of that aeroplane, inform all flight crews, and, thereafter, operate the aeroplane accordingly.



Credit:

In the interim period of the modification on all the affected aeroplanes of the fleet, EASA has no objection that operators keep the required action as per paragraph 1 & 3 of this AD until the complete fleet is modified as per paragraph 4, without AMOC approval. Beyond that the latest implementation time of paragraph 5 must be 3 months after the time requirement of paragraph 4.

Explanation for the suggested wording:

The extended timeframe would ensure that the documentation changes could be incorporated within the normal revision cycle, which is typically 3 months, without an interim release of an unplanned revision or temporary revisions (TR).

The Credit in the paragraph would further ensure that the documentation doesn't need to be updated within batches during the interim period of the modification of the total affected fleet.

Moreover, the added wording ("...or within 3 months after the effective date of this AD, whichever occurs later...") would ensure that no operator would have exceeded the AD time requirement of paragraph 5, in case that an operator had already modified their affected fleet before AD release but didn't remove the more restrictive AFM and MMEL TR.

However, should EASA have a different opinion/interpretation of the time requirement of AD paragraph 5, please let us know immediately.

EASA response:

See EASA answer to comment #2.

