

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-124

[Published on 12 September 2022 and officially closed for comments on 10 October 2022]

**Commenter 1: Cathay Pacific Airways Limited – Emmajame Tordera Sola – 19/09/2022**

### Comment # 1

Ref /1/ SB A350-42-P017 Rev 03

Ref /2/ OIT 999.0040/22 Rev 01

Ref /3/ RIL V42M21003467 R02

We note that ref /1/ Airbus SB A350-42-P017 Rev 03 or later approved revisions is acceptable for compliance with the requirements of the PAD Para 1.1.

Per attached ref /2/ OIT 999.0040/22 and ref /3/ RIL V42M21003467, we understand that Airbus recommends to report embodiment of ref /1/ Rev 03 of SB A350-42-P017 in case operator already reported Revision 02 or previous revision of SB A350-42-P017 to ensure implementation of SB A350-27-P058. Furthermore, ref /1/ SB A350-42-P017 Rev 03 additional work has no physical work on aircraft required and only consists in clarifying the embodiment sequence to first accomplish SB A350-42-P017 and then SB A350-27-P058.

In light of the above, we kindly request EASA to advise the following:

1. Please confirm that embodiment report (in Airbus World) of ref /1/ SB A350-42-P017 Rev 03 is acceptable for compliance with the requirements of PAD Para 1.1.
2. Please confirm that Airbus A350-42-P017 Rev 02 or previous revision of SB A350-42-P017 are also acceptable for compliance with the requirements of the PAD 1.1. as indicated in ref /2/ OIT and ref /3/ RIL.



RIL V42M21003467 SB\_42-P017\_r03.pdf OIT 999.0040\_22 Rev  
R02.pdf



01.pdf

### EASA response:

**Comment not agreed. The AD is not applicable to an aeroplane on which Airbus SB A350-42-P017 has been embodied in service.**



*An aeroplane on which Airbus SB A350-42-P017 original issue, Revision 1 or Revision 2 has been embodied in service might be affected by EASA AD ~~2022-0089~~ 2022-0098.*

*An aeroplane on which Airbus SB A350-42-P017 Revision 3 (and consequently Airbus SB A350-27-P058) have been embodied before the effective date of this AD is already in compliance with this new AD under the clause “Required as indicated, unless accomplished previously”.*

*The Final AD has been modified to specify that the exception clause in its Applicability includes also revision 1 and revision 2 of the Airbus SB A350-42-P017.*

**Commenter 2: Etihad Airways – Borja Dosal Roiz – 23/09/2022**

**Comment # 2**

As an A350 operator Etihad Airways would like to provide the below comments to EASA PAD 22-124:

EASA PAD 22-124 proposes to mandate the embodiment of SB A350-42-P017 (AVIONICS BATCH 7A - PART 1). Not only does this SB require a massive software upload and has a severe Flight Operations impact, but this SB has the following list of SBs that need to be done concurrently in Etihad A350 fleet prior to the embodiment of SB A350-42-P017:

- A350-42-P016 (INTEGRATED MODULAR AVIONICS – AVIONICS FULL DUPLEX SWITCHED ETHERNET (AFDX) NETWORK DEFINE AND INSTALL AFDX CONFIGURATION TABLES T52S (LAYER 1.4) AND T52D (DUAL LAYER))
- A350-22-P017 (AUTO FLIGHT - FLIGHT MANAGEMENT (FM) DEFINE AND INSTALL FMS S6)
- A350-27-P030 (FLIGHT CONTROLS HIGH LIFT CONTROL AND MONITORING - INTRODUCE NEW SFCC SOFTWARE STANDARD 'S5.2')
- A350-30-P009 (ICE AND RAIN PROTECTION ICE AND RAIN PROTECTION)
- A350-31-P022 (INDICATING/RECORDING SYSTEMS INTEGRATED CONTROL PANELS (ICP) - INSTALL NEW ICP MID R AND STICKERS FOR TOS2/TOM AND ROPS FUNCTION MANUAL INHIBITION)
- A350-31-P023 (INDICATING/RECORDING SYSTEMS INDICATING/RECORDING SYS. - FLIGHT DATA RECORDING AND CENTRALIZED DATA ACQUIS. - DEFINE AND INSTALL FDIA SOFTWARE S5.2)
- A350-31-P030 (INDICATING/RECORDING SYSTEMS FLIGHT WARNING SYSTEM (FWS) - ACTIVATE THE ECAM TEMPORARY CHANGE (ECAM TC) CODE NO 27AF FOR AIRBUS TEMPORARY QUICK CHANGE (ATQC) ENVELOPE)
- A350-31-P040 (INDICATING/RECORDING SYSTEMS FLIGHT WARNING SYSTEM (FWS) - INSTALL NEW AIRBUS TEMPORARY QUICK CHANGE (ATQC) STANDARD (STD) V3 FOR FWS STD S6/2.0)



- A350-34-P022 (NAVIGATION AIRCRAFT ENVIRONMENT SURVEILLANCE SYSTEM - DEFINE AND INSTALL AESS S4 STANDAR)
- A350-42-P007 (ICE AND RAIN PROTECTION ICE AND RAIN PROTECTION)
- A350-42-P011 (INTEGRATED MODULAR AVIONICS PIP/ULR AVIONIC BATCH (FQMS, IGGS, AICF AND FPS UPGRADE))
- A350-42-P013 (INTEGRATED MODULAR AVIONICS INTEGRATED MODULAR AVIONICS)
- A350-42-P015 (INTEGRATED MODULAR AVIONICS CRDC - DEFINE AND INSTALL MCCT CRDC B LINKED TO RAT PRESSURE SWITCH INHIBITION)
- A350-46-P012 (INFORMATION SYSTEMS INSTALL FSA-NG STANDARD 5.0 FOR ACD)

Moreover the embodiment of SB A350-42-P017 will make Etihad face the following operational challenges:

- Multiple Procedural Changes in the normal operation.
- Normal checklist flows severely amended, changing the Airbus operational philosophy.
- Additional training required to mitigate operational risks, creating extra manpower burden.
- Risk associated with transition and implementation.
- Etihad Airways is still presently in the Entry-Into-Service phase as the first operational flight took place on the 31st March 2022, so non-essential changes unnecessarily increase our general operational risk.

The embodiment of SB A350-42-P017 and the completion of Avionics Batch 7A in our A350 fleet is certainly in Etihad's interest, but a longer timeline would help on better planning the accomplishment in our fleet.

Based on all the above reasons, Etihad is requesting to EASA to change the timeline of 14 months proposed in PAD 22-124 to 24 months.

***EASA response:***

***Comment not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter. No changes have been made to the Final AD in response to this comment***

