

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-041

[Published on 04 March 2025 and officially closed for comments on 01 April 2025]

Commenter 1: ASL Airlines UK – Andreas Schmid – 04/03/2025

Comment # 1

The Collins Multi Mode Receiver GLU 2100 (P/N 822-2532-100) might be installed by production as an option on the Boeing 737NG models. Therefore, I suggest to add the 737-600/700/800/900 to the table in Appendix 2 showing potentially affected aircraft.

EASA response: Comment not agreed. According to available information, Boeing 737NG are not approved for LPV-200 operations.

Commenter 2: Aer Lingus – Lucia Martin Meavilla – 05/03/2025

Comment # 2

After Collins informed us of the TSO Non-compliance and production of units with affected SW was stopped, we suggested to Collins that a clear way of identification of SW Standard installed on each unit should be provided and therefore, clearly stated in the Form 1's or Form 8130's Box 12, to avoid incorrect installations or undesired SW mixabilities. They were unwilling at the time to include any modification to the information in their paperwork and advised that only a paper tag would be attached to each unit, specifying the SW loaded. Their recommendation to operators was to keep records of serial numbers received with upgraded software. You can find attached an example of new GLU-2100's units recently received from Collins, with no reference in the provided paperwork to the loaded SW.

In our opinion, this is a very poor tracking method so we expressed our concerns about it back then, but now that this will be part of an AD and units with SW specified in PAD will not be allowed for installation, we believe it is crucial that they provide clear and straightforward information of the SW loaded on each unit, so we can correctly track them to comply with proposed AD. Only a physical paper tag could lead to major problems on operator's side.

Could we kindly ask EASA to consider this concern and discuss it with Collins, if appropriate?

EASA response: Comment noted. No changes have been made to the Final AD in response to this comment.



Commenter 3: FR Aviation Ltd t/a Draken Europe – Davide Alleva – 05/03/2025

Comment # 3

Replacement:

(1) For affected aeroplanes having airworthiness approval for LPV-200 operations: Within 2 years after the effective date of this AD, or before next flight after having obtained the airworthiness approval for LPV-200 operations, whichever occurs later, replace each affected part with a serviceable part in accordance with the instructions of the applicable aeroplane modification. Does it mean that if an airworthiness approval for LPV-200 is already in place then the compliance period is 2 years but if it is obtained in the meantime then it is before next flight?

Part(s) installation:

(2) Do not install an affected part on any aeroplane having airworthiness approval for LPV-200 operations, as required by paragraph (2.1) or (2.2) of this AD, as applicable:

(2.1) For affected aeroplanes: After modification of the aeroplane as required by paragraph (1) of this AD.

(2.2) For non-affected aeroplanes: From the effective date of this AD.

The part installation statement could indicate that the AD is only applicable to aircraft with LPV-200 operations approval, but I don't think this is the intent of the AD which (I believe) is indicating that all aircraft with the P/N listed in Appendix 1 are affected? Can you please clarify.

EASA response:

Comment 1) Noted. The two conditions (“2 years after the effective date of the AD”; “before next flight after having obtained the airworthiness approval for LPV-200 operations”) are defined under a “whichever occurs later” clause. This means that if the airworthiness approval is obtained within 2 years after the effective date of the AD, the replacement required by the AD is still due within 2 years after the effective date of the AD. Only if the airworthiness approval is obtained after the 2 years, replacement is due before next flight after that approval.

Comment 2) Not agreed: The prohibition to install an affected part is only effective for an airplane having airworthiness approval for LPV 200 operations. For aeroplanes not having airworthiness approval for LPV-200, there is no potential unsafe condition justifying such prohibition.

No changes have been made to the Final AD in response to these comments.

