

CRD – Proposed Airworthiness Directive 05-010

Comment	Response
----------------	-----------------

Paragraph	N/A
------------------	-----

Comment No. 1	DGAC – Antoine Herve
----------------------	----------------------

<p>The AD should mention that aircraft concerned by the AD are those which are flying in the european airspace. (That is european registered aircraft but also non european registered aircraft flying over the european sky)</p>	<p>Not Agreed</p> <p>This AD is applicable to all aircraft with this equipment installed. The problem could occur in any airspace where a 4096 ATC Code Change is required.</p>
---	---

Paragraph	Compliance
------------------	------------

Comment No. 2	BACitiExpress – Colin Jackson
----------------------	-------------------------------

<p>1) Incorporation of the Honeywell SB as required by the proposed AD equates to compliance with the requirements for Enhanced Mode ‘S’ which is mandated in European airspace by 31 March 2007. This gives ERJ-145 Operators a number of problems.</p> <p>i) The referenced Honeywell service bulletin for the equipment applicable to the ERJ-145 type is not currently available.</p> <p>ii) There is currently no time-scale for availability for the appropriate Honeywell mod kits and consequently no commencement date for initiation of the modification process.</p> <p>iii) The applicable Embraer service bulletin requires on aircraft wiring changes prior to installation of the Honeywell modified units.</p>	<p>i), ii) & iii) If the Embraer Service Bulletin, for Enhanced Surveillance, is not available in the required timescales, the aircraft Operators will be required to modify their equipment in accordance with the Honeywell SB (which only addresses the correction of the problem and does not update the unit to Mode S Enhanced Surveillance). We understand that this will require the equipment to be removed twice. Once to address the AD and again to comply will the Mode S Enhanced Surveillance transition end date of 31 March 2007, but it is important to modify all transponder equipment within</p>
--	---

CRD PAD 05-010

It is British Airways CitiExpress submission that the compliance period for the proposed AD should be the same as Enhanced Mode S implementation, 31 st March 2007.	<p>the specified period.</p> <p>Due to safety concerns it is considered inappropriate to extend the compliance period to 31st March 2007.</p>
--	--

Paragraph	Compliance
------------------	------------

Comment No. 3	Embraer – Ricardo Andre
----------------------	-------------------------

<p>1. We would like to suggest the inclusion of the following instruction: "This can be achieved by inserting a copy of this AD in the AFM Normal Procedures Section".</p> <p>2. Considering the RCZ upgrade to the Enhanced Surveillance automatically correct the inappropriate Elementary Surveillance transponder reversion to stand-by mode and also considering March 2007 is the dead-line for the upgrade of the transponders to the Enhanced Mode we would like to suggest the same compliance time for this AD (March 2007).</p> <p>3. We would like to point out Honeywell SB Number A21-3851-002 mentioned on PAD is not correct. The appropriate number is A24-3851-002. SB number A21-3851-005 is correct</p>	<p>1. Agreed. This will be included in the AD.</p> <p>2. Not agreed. Due to safety concerns it is considered inappropriate to extend the compliance period to 31st March 2007.</p> <p>3. Noted. The AD will be amended accordingly.</p>
---	--

Paragraph	Compliance
------------------	------------

Comment No. 4	SkyGuide - Christoph Gilgen
----------------------	-----------------------------

CRD PAD 05-010

<p>I cannot accept the 12 months delay given to Honeywell and the Operators for fixing this faulty Transponder problem. The Residential risk put on the ATM system is simply too high and not tolerable. We need shorter periods, a maximum of 3 months and possibly "active measures" to take care of those flights and operators that are accounting for most flights in our European airspace (airlines, regular operators) in order to bring down the frequency and probability. Only like this we can control the problem and keep the risks and consequences at an acceptable and reasonable level.</p>	<p>Agreed. A period of 9 months will be inserted into the AD as the time required to update the transponder equipment.</p> <p>Note: EASA have already informed 4 airlines, who regularly fly in the affected airspace, recommending that they modify their equipment immediately. Honeywell are also supporting this initiative.</p>
---	--

Paragraph	Publications
------------------	--------------

Comment No. 5	Luxair - Christophe Henriot
----------------------	-----------------------------

<p>We would advise you that we face a problem with the Honeywell publication references. For tracking purpose, as an operator we choose to follow our part SB status using the Honeywell ATA SB number that is 7510700-23-0047. This ATA SB number is related to an honeywell publication number (for this SB, it is A21-3851-005).</p> <p>We would get in the final AD at least the cross reference between the ATA SB ref and the Honeywell internal publication number and not only the last one.</p>	<p>Honeywell have stated that the ATA SB number is contained within the referenced SB, therefore the ATA SB number will not be included in the AD.</p>
---	--

Paragraph	General Comments affecting all para's
------------------	---------------------------------------

Comment No. 6	UK CAA – Rick Bewsey
----------------------	----------------------

CRD PAD 05-010

<p>1. We feel there should be a ref to a PART 21 procedure for the procedure and classification of this change</p> <p>2. How will this equipment AD become effective on aircraft for the AFM limitation?</p> <p>3. It would be useful to quote the applicable ETSO number (2c38e)</p> <p>4. Open brackets against the units model number is not in compliance with part 21 - open brackets should be quoted for the part numbers only</p> <p>5. What will be the new part numbers of the modified equipment - it is not quoted on the AD? How will this be controlled? Note that an aircraft IPC will quote affected part numbers WITHOUT open brackets (and we have confirmed that this is correct)!</p>	<p>1. Not Agreed. The equipment design change was classified by Honeywell using their FAR 21 design change classification procedure. The aircraft level design change should be classified as minor, due to limited impact on system functionality or, if the aircraft Parts Catalogue lists the part number of the transponder as 7510700-(), then the modified equipment could be installed as a maintenance action. We do not believe that the AD requires a reference to Part 21.</p> <p>2. The AD will instruct the operator to update the AFM by inserting a copy of the AD in the AFM Normal Procedures Section of the AFM.</p> <p>3. The ETSO Authorisation is quoted on the AD and it is possible for the reader to ascertain the ETSO's applicable, to this equipment, by reference to the EASA web site.</p> <p>4. Agreed. This is outside the terms of reference for the AD but EASA will investigate why Honeywell are using open brackets for the unit model number.</p> <p>5. The new part numbers are quoted in the referenced Honeywell Service Bulletins. If the aircraft Parts Catalogue lists the part number, of the transponder, as 7510700-(), then the modified equipment could be installed as a maintenance action, otherwise the it should be a minor aircraft level change</p>
--	--

Paragraph	Compliance
------------------	------------

Comment No. 7	IFALPA, IFACTA & ECA
----------------------	----------------------

<p>The European Aviation Safety Agency (EASA) has launched a consultation process on a proposed AD (Airworthiness Directive) – a compulsory safety bulletin – for the faulty Honeywell PRIMUS II transponders which is due to come out at the end of July 2005. The proposed time frame for the operators and Honeywell to comply with the requirements is stated as 12 months from the date of the published AD.</p> <p>The current mitigation actions are clearly not enough. Due to the severity and the frequency of the occurrences, the hazard analysis and safety case mitigation have become insufficient to maintain a safe flow of air traffic involving aircraft using this flawed technology. For this reason we believe that all National Aviation Authorities should publish a notice to operators. Similar to the UK CAA's action, this notice should highlight the interim procedural changes required and the justification. Due to the fallibility of such procedures, the time frame for corrective action should be as soon as possible and not 12 months.</p>	<p>The proposed period of 12 months will be reduced to 9 months and inserted into the AD as the time required to update the transponder equipment.</p>
--	--

Paragraph	Publications
------------------	--------------

Comment No. 8	Honeywell – Alan Howell
----------------------	-------------------------

<p>Attached are copies of the relevant Service Bulletins as discussed. As I mentioned in our telecon, these SBs are likely to be revised in the very near future as I believe the FAA were unhappy with some of the wording and have requested some small changes. I also think a dash number was missed from one of the SBs and have reported this to the factory for inclusion (I believe your PAD has all the right dash numbers included).</p>	<p>The correct SB references will be included in the AD (A21-3851-005 & A24-3851-002)</p>
--	---

Paragraph	Reason
------------------	--------

CRD PAD 05-010

Comment No. 9	ECA – Captian Heinz Frühwirth
----------------------	-------------------------------

<p>1. The text in the box "Reason" should be changed to reflect that "A design deficiency causes the transponders to revert to standby mode, if a change of a Mode A code is not completed within 5 seconds." It is unacceptable to imply "a failure of the crew" to be the reason of the problem.</p> <p>2. A Compliance Period of 12 months is considered to be excessive given the occurrence of serious incidents.</p> <p>3. The requirements in the "Compliance" section should include to incorporate information on the potential problem of these transponders and the interim pilots procedure should be brought immediately to the attention of all flight crews concerned. A 30 day period for providing this safety critical information in the AFM is considered excessive and can only be accepted if it is accompanied by such immediate notification to the flight crew.</p>	<p>1. Agreed – The text in the AD will be changed</p> <p>2. Agreed - The proposed period of 12 months will be reduced to 9 months and inserted into the AD as the time required to update the transponder equipment.</p> <p>3. The 'Reason' section contains the information and effect of the problem on the transponder. It is therefore considered not necessary to repeat this information in the 'Compliance' section.</p> <p>Agreed - The 30 day period will be replaced by a 5 day requirement to include the wording stated in the AD, into the Aircraft Flight Manual.</p>
--	---

Paragraph	Publications
------------------	--------------

Comment No. 10	Belgocontrol – Paul Hopff
-----------------------	---------------------------

<p>A23-3851-002 is a Technical Newsletter, NOT a Service Bulletin! A21-3851-005: are you sure about this number? It is not available on-line.</p>	<p>The technical references have been reviewed by Honeywell and to the AD amended accordingly. See Comment 11.</p>
---	--

Paragraph	Compliance
------------------	------------

Comment No. 11	Honeywell – Don Diehn
-----------------------	-----------------------

<p>1. Honeywell respectfully requests that the compliance time limit be revised to 18 months. The rationale behind this change is that we have been in contact with our Service Centers and Exchange & Rental personnel and they feel that they would require a total of 6,534 hours to accomplish the rework of the remaining units.</p> <p>2. The Compliance Section has a typographical error with one of the Service Bulletins called out. The correct Service Bulletin numbers are: A21-3851-005 and A24-3851-002.</p> <p>3. The Reference Section also contains the same typographical error with the Service Bulletin number.</p>	<p>1. Due to safety concerns it is considered inappropriate to extend the compliance period to 18 months. Honeywell are requested to review their modification schedule.</p> <p>2. The AD will be modified accordingly.</p> <p>3. The AD will be modified accordingly.</p>
--	--

CRD PAD 05-010
