

EASA PAD No. 06 – 148R1
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>DHL operates a fleet of 35 Boeing 757 using the THALES EVR716 VHF Data radio.</p> <p>Each airplane is fitted with 02 units dedicated for communications to Air Traffic Control or other aircrafts. The third unit provides communication means for the ACARS system.</p> <p>Based on the data provided in the PAD 06-148R1, DHL would like to provide some comments:</p> <p>A) The EVR716 can only be upgraded in the OEM shop facilities or any approved shop to do so. Based on the current Turn Around Time (TAT) that we have experienced, the compliance delay of 24 months seems not to be achievable to fulfill the proposed requirements. A 36 months compliance time would be more realistic.</p> <p>B) Distinction should be made between radios used for ATC and radios for non-critical application (ACARS). These last radios should not be upgraded within the same time frame as the main radios. DHL uses a Maintenance & Engineering software that allows us to know the configuration of the units on the fleet, and we could easily track the modified/non-modified units. Other airlines use similar software package and could track this the same manner.</p>	<p>Jacques Vandermeulen</p> <p>Boeing Service Manager</p> <p>European Air Transport N.V./S.A.</p>	03/10/2006	<p>A) Taking into account your comments, we agree to extend the compliance period from 24 months to 30 months. We believe 30 months represents a compromise which will allow operators a reasonable time period in which to update their equipment.</p> <p>B) We disagree. Although DHL may be able to track modified and unmodified units and the position to which they are fitted, this may not be possible for other airlines. EASA would like to see all Thales EVR716 VHF Data radio's modified regardless of position/application on the aircraft.</p>
Compliance	<p>Further to PAD06-148R1 publication in view to extend the applicability of the PAD to VHF PNs certified by AIRBUS (VSB EVR7-23-05), Airbus maintains its position (ref Eric Blancaneaux' mail sent on 18 september 2006 to Pascal Medal) and conclude to additional comments :</p> <p>* According to EUROCONTROL investigation (document sent by EASA), only 34% are attributed to suspected PLOC events.</p> <p>* No data, no figure was given for THALES affected equipment.</p> <p>* Other cases have been reported to AI affecting other VHF manufacturers (COLLINS/HONEYWELL): Where is the equivalent treatment? Why to penalize THALES;</p>	<p>Maryse CASSAGNAU-SEGOL</p> <p>SA Continued Airworthiness</p> <p>Office of Airworthiness –</p> <p>AIRBUS</p>	17/10/2006	<p>Eurocontrol are continuing to monitor suspected PLOC events and the data is provided to EASA, via the National Aviation Authorities. If another manufacturer's equipment is found to exhibit similar tendencies they will be asked to conduct tests similar to those undertaken by Thales. The results of these tests could result in an equipment Airworthiness Directive similar to this one.</p>

	<p>We consider that it is not appropriate to mandate this VSB because it is only a partial fix which was not demonstrated to reduce the risk of PLOC. As a conclusion we do not agree such a mandatory action and also considering the classification of the impact on airworthiness for AIRBUS aircraft.</p>			<p>One large operator has equipped its aircraft with modified Thales VHF Data radio's and has not reported any PLOC events since.</p>
Compliance	<p>British Airways submits the followign comment regarding the wording of the 'Compliance' section of PAD 06 - 148R1.</p> <p>Existing Wording For Part Numbers: EVR716-01-0200A - Thales Communications Service Bulletins No. EVR716-23-012 Rev. 01 is required. Change SB revision limitation ie - For Part Numbers: EVR716-01-0200A - Thales Communications Service Bulletins No. EVR716-23-012 Initial Issue or EVR716-23-012 Rev. 01 is required.</p> <p>Existing Wording For Part Numbers: EVR716-01-0100A & & EVR750-03-0100A Thales Communications Service Bulletins No EVR7-23-05 Rev. 01 ir required. Change SB revision limitation ie - For Part Numbers: EVR716-01-0100A & & EVR750-03-0100A Thales Communications Service Bulletins No EVR7-23-05 Initial Issue or EVR7-23-05 Rev. 01 is required.</p> <p>Reason. British Airways have already modified units to the initial issue of these service bulletins.</p> <p>Justification. The technical content of these Service Bulletins at initial issue is the same as the Rev. 01 content. Rev 01 merely changed costing and descriptive elements.</p>	<p>Robert Smith</p> <p>Senior Tech Engineer</p> <p>British Airways Avionics/FDR Group</p>	22/09/2006	Accepted.