


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-115 [Published on 10 November 2010 and officially closed for comments on 08 December 2010]

Commenter 1: Air Berlin Group – Günter Lange – 11/11/2010
Comment # 1

As mentioned in Airbus-OIT SE 999.0101/10 08 November 2010 a change to the FWC standard H2F5 will eventually generate an “AUTO FLT A/THR OFF” ECAM caution during landing phase, if SEC standard 98 or 104 or 112 is installed.

It is not recommended by Airbus to install FWC H2F5 before modifying SEC to standard 120. Retrofit campaign for this is expected to be started in April 2011.

Maybe this date should be considered to be drawn in attention for the issuance of the AD 10-115.

EASA response:

The SEC standard 120 is installed in production since April 2010 and retrofitted since September 2010 for a limited number of operators for an on-going in-service evaluation. A general retrofit is expected to be started in April 2011 but it could be anticipated for operators willing to install simultaneously the FWC standard H2F5.

Considering the compliance time proposed for the FWC upgrade is 48 months after the effective date of this AD, EASA considers that this delay is sufficient to synchronize the upgrade of the FWC and SEC systems.

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

Commenter 2: Lufthansa Technik AG – Thomas Dauer – 2/12/2010
Comment # 2

On behalf of Lufthansa AG (DLH) and Lufthansa Technik AG (LHT), I would like to comment on EASA PAD No. 10-115 (Installation of new Flight Warning Computer standard H2F5), respectively on the effective date of the upcoming AD.

PAD No. 10-115 announces the effective date of the upcoming AD being 14 days after its issuance. To the opinion of DLH / LHT, the effective date of the AD should not be earlier than availability of new SEC 120.

The installation of the new Flight Warning Computer (FWC) H2F5 standard requires the installation of minimum standards of Spoiler & Elevator Computer (SEC) and Flight Control Data Concentrator (FCDC). The most common standards installed on DLH A320Fam aircraft are SEC 112 and FCDC 57. So this would require modification of the presently installed SEC 112 into SEC 119 or SEC 120. According to Airbus, SEC 120 will be available not until April 2011.

In order not to confuse their flight crews by three different SEC standards (112 / 119 / 120), DLH will not modify their SEC 112 units into SEC 119 but right into SEC 120 soon as this standard is available. This means, DLH will accomplish installation of FWC H2F5 and SEC 120 simultaneously.

Due to the impact of the SEC standard, the effective date of the upcoming AD should not be earlier than availability of the new SEC 120 standard. DLH / LHT would appreciate if the effective date presently mentioned by the PAD 10-115 would be adapted accordingly.

EASA response:

The SEC standard 120 is installed in production since April 2010 and retrofitted since September 2010 for a limited number of operators for an on-going in-service evaluation. A general retrofit is expected to be started in April 2011 but it could be anticipated for operators willing to install simultaneously the FWC standard H2F5.

Considering the compliance time proposed for the FWC upgrade is 48 months after the effective date of this AD, EASA considers that this delay is sufficient to synchronize the upgrade of the FWC and SEC systems.

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