


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-084 [Published on 10 August 2011 and officially closed for comments on 07 September 2011]

Commenter 1: Spanair – Borja Dosal Roiz – Thu 01/09/2011 11:15

Comment # 1

According to EASA PAD No.: 11-08, it will become mandatory to perform Thales Avionics Service Bulletin (SB) C16291A-34-007 Revision 01.

Thales Avionics Service Bulletin (SB) C16291A-34-007 mentions that the modification will be done free of charge to the Operators not later than 24 months after the original issue date, which is AUG 27/2009.

Exactly 24 months later after the original issue date (AUG 27/2009), EASA emits EASA PAD No.: 11-08. Now the cost of the implementation of Thales Avionics Service Bulletin (SB) C16291A-34-007 will be borne by the Operator.

Now that this Service Bulletin will become mandatory Spanair would like to know if EASA would request to Thales the extension of this free of charge period.

EASA response:

Comment not accepted. Any request on commercial aspects shall be raised directly to the vendor or to the aeroplane manufacturer.

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

Commenter 2: Spring Airlines – Liu Zixin – Fri 12/08/2011 15:49

Comment # 2

According to EASA PAD No.11-084 Compliance paragraph (1), replace the affected AOA which listed in VSB C16291A-34-007R1, unless it has Amend "E" marking. But, according to VSB C16291A-34-007R1, [if] the AOA had been inspected in according to this VSB, a specific label (Refer to Figure 3) is marked.

Could you please confirm there is Amend "E" marking in place of Inspected Label on the Post VSB AOA?



Inspection label position PNR F1317654

Figure 3

EASA response:

Comment accepted. VSB C16291A-34-007 Rev00 covered the Amendment E which was a simple test at -55°C. This was finally deemed inadequate. Consequently, any probe having Amendment E, but listed in VSB C16291A-34-007 Rev01 needs to be removed. Thus, the wording “unless it has the marking “E” recorded on its amendment plate” has been removed from the Final AD text.

Commenter 3: Lufthansa Technik – Thomas Dauer – Fri 19/08/2011 10:55**Comment # 3**

On behalf of DLH / LHT, I would like to send you our enquiry on PAD 11-084 concerning Angle of Attack (AoA) Probes.

PAD 11-084 requires an inspection of all AoA probes as per SB A320-34-1452 within 6 month. This period to DLH / LHT seems considerably too short, based on the limited availability of AoA loan-units compared to the large amount of affected AoA units.

Due to the large number of affected units, also the necessary logistics (shipment of repaired / removed sensors) will noticeably prolongate the course of action.

Without receiving a large amount of additional AoA loan-units plus repair-material from vendor Thales, accomplishment of SB A320-34-1452 (A320-34-1444) to DLH / LHT seems not possible within 6 month.

But as talking with Thales recently, it seems as Thales was not yet informed about the upcoming EASA AD on AoA sensors on A320 Fam aircraft.

DLH / LHT would highly appreciate if the compliance time of the upcoming EASA AD would be reconsidered.

EASA response:

Comment accepted. The Compliance time has been reviewed with Airbus and extended to 12 months. The Final AD has been amended accordingly.

Commenter 4: Bangkok Airways – Anurak – Tue 16/08/2011 12:36**Comment # 4**

I have some comments from Bangkok Airways regarding this AOA AD. We have total 9 affected sensors and we have only one spare sensor to support the program. So as we have some experience with THALES, we believe that 6 months would be very tight to comply with for 9 sensors. In addition, the VSB said that THALES will support FOC only within 24 months from original of the VSB (Aug 2009). So it is already 24 months now.

So could you please review and consider more time to comply and please talk to the vendor for any commercial support since it is design defect (if possible).

EASA response:

Comment accepted. The Compliance time has been reviewed with Airbus and extended to 12 months. The Final AD has been amended accordingly.

However, any request on commercial aspects shall be raised directly to the vendor or to the aeroplane manufacturer.

Commenter 5: Adria Airways Tehnika – Jure Spruk – Thu 11/08/2011 10:44

Comment # 5

I am writing you concerning part 1 of PAD 11-084, which mandates replacement of AOA probe P/N: C16291AA, in accordance with Airbus SB A320-34-1452, which is Inspection SB. Modified AOA sensors P/N: C16291AB, are installed in accordance with instructions in Airbus SB A320-34-1444 (MOD 150006). Thank you for explanation.

EASA response:

Airbus SB A320-34-1452 refers to Airbus SB A320-34-1444 for the replacement of AOA probe P/N C16291AA by AOA probe C16291AB.

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