

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-155 [Published on 28 November 2012 and officially closed for comments on 26 December 2012]

Commenter 1: Air France – Pascal Dumez – 29/11/2012
Comment # 1

The § 3 of this PAD seems ambiguous. Would it be possible to clarify the requirement.

It may be understood by three possibilities:

- 1) Do not install FCPC which is not 2K2(hardware) W12(software) (no FCPC installed is possible)
- 2) You may install an FCPC whatever the hardware but if it is a 2K2 the software must be W12
- 3) Install only a 2K2 W12 but in that case future improvement of the FCPC (HARDWARE evolution or software evolution) won't be installable on the A/C due to this requirement.

I think the good explanation would be “ install the current FCPC 2K2 standard with software W12 or future improved standard ”

EASA response: EASA disagree.

EASA confirm that the third interpretation correspond to this § (3) paragraph requirement. For future FCPC (hardware evolution or software evolution). EASA cannot provide a credit at the time of AD issuance for non approved modifications. EASA is working with Airbus in order to ensure that any future evolution of the hardware or the software will not degrade the mandatory configuration and thus to avoid to come back to the unsafe condition.

Commenter 2: HI FLY – Rui Cavaco – 29/11/2012
Comment # 2

We have some A340-500 fitted with ADIRU manufactured by HONEYWELL combined with FCPC standard W11. PAD 12-155 and final AD, should the applicability remains unchanged, will not apply to such aircraft.

However, SB A340-27-5051 says:

- it has been classified Mandatory by AIRBUS,
- it is expected that an [final] AD published by EASA will be issued to confirm this classification,
- the accomplishment timescale will be given in the [final] AD, and,
- it is effective to our aircraft noted above (ADIRU standard not relevant)

Having this said, maybe the final AD could contain a remark concerning SB A340-27-5051's classification and accomplishment timescale to be considered by operators of, not only but also, A340-500 aircraft fitted with ADIRU manufactured by HONEYWELL.

EASA response: EASA agree.

AD applicability has been expanded to all A340-500/-600 aeroplanes, irrespective of ADIRU manufacturer.

Commenter 3: Lufthansa – Rolf Schweitzer – 04/12/2012

Comment # 3

Paragraph (3) states that [“... after modification of an aeroplane as required by paragraph (1) of this AD, do not install an FCPC on that aeroplane, unless the FCPC is 2K2 hardware with integrating software standard W12.”]

After modification per AD paragraph (1) (SB A340-27-5051) the FCPC gets the new P/N LA2K2B100GC0000.

Airbus is requested to add this new P/N to the IPC for POST SB 27-5051 condition before publication of the EAD in order to comply with a.m. para. (3).

EASA response: As this comment is dedicated to Airbus, EASA transferred the comment to Airbus.

Airbus answer is that IPC will be updated through usual process. There is no need to update IPC before AD publication in order to be compliant with the AD. SB 27-5051 embodiment is required to be compliant to the AD.