


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 14-139</p> <p align="center">[Published on 09 September 2014 and officially closed for comments on 07 October 2014]</p>

Commenter 1: Air Malta – Patrick Farrugia – 10/09/2014

Comment # 1

All subject aircraft have Thales Pitots C16195BA and do not have mod 25578 incorporated and so technically the PAD steps (1) and (2) is applicable. However PAD steps (1) and (2) instruct to replace the Thales Pitots by Goodrich Pitots according to either SB 34-1170 or SBs 34-1456 and 34-1463. None of these SBs are actually effective to subject aircraft. This PAD therefore currently instructs to accomplish SBs that are not applicable and therefore which cannot be accomplished

EASA response:

Comment understood, but not agreed.

The MSN ‘effectivity’ of the SBs (originally, optional modifications) was defined by the MSN from operators who had requested the mod package from Airbus. The group of ‘affected’ MSN is therefore extended by each further SB revision, prompted by operator orders. Airbus is considering to revise SB A320-34-1170 to reflect the new status of the SB, listing all ‘affected’ MSN.

Please also note paragraph (6) of the AD [was §(5) in the PAD] which allows installation of alternative probes under the conditions specified.

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

Commenter 2: Hi FLY – Rui Cavaco – 10/09/2014

Comment # 2

In normal conditions, all airworthy SA aircraft, as of 2014, should have been fitted with P/N C16195AA in lieu of P/N 50620-10 (the latter being removed for operational service) no later than Aug 18th 2003 (i.e. within 24 months from E/D of AD 2001-362).

We understand that AD 2001-362 will be cancelled by final AD, without retaining any of their requirements. Even so, putting P/N 50620-10 on the same replacement context of P/Ns C16195AA and C16195BA may be confusing.

Have you considered to cover P/N 50620-10 by different means? Maybe a specific paragraph and/or notes throughout the RACT section would help. This would enable the required actions to be focused only on airworthy products as of E/D of final AD (i.e. P/N C16195AA or P/N C16195BA).

EASA response:

Comments agreed. As it cannot positively determined that all P/N 50620-10 probes have been replaced and removed from service, EASA have decided to retain the requirements of DGAC France AD 2001-362 (compliance time expired 18 August 2003 for aeroplanes registered in EASA Member States) in the Final AD. The Reason section and several paragraphs of the RACT section have been amended accordingly.

Commenter 3: Bangkok Airways – Anurak – 12/09/2014**Comment # 3**

Bangkok Airways has reviewed the PAD 14-139 regarding THALES PITOT PROBE.

Most of our fleet was delivered with THALES since production. I do not see any statement in the PAD for aircraft in service.

1. Do all A320 family airplanes have to replace THALES probes to Goodrich ones per SB 34-1170?
2. What is the EASA approved PITOT PROBE PN and its manufacturer and under what SB?
3. Have you been aware of that to change from THALES to Goodrich is optional in the mean of SB and it is cost burden?

Actually, I do not understand this PAD. Can you please provide answers for above questions and may clarify more detail if you wish?

EASA response:

Comments not agreed. The AD applies to in service aircraft as specified in the applicability section.

1. The AD requires removal from service of all affected Thales probes, P/N as identified in the AD, and replacement of those probes with alternative, approved, probes.
2. Installation of a Goodrich probe (see Airbus SB references in the AD) as replacement is the currently available method to comply, but other alternatives are expected to become available. Please also note paragraph (6) of the AD [was §(5) in the PAD] which allows installation of alternative probes under the conditions specified.
3. See EASA answer to Commenter #1 above.

No changes have been made to the Final AD in response to these comments.

Commenter 4: Etihad Airways – Borja Dosal Roiz – 16/09/2014**Comment # 4**

I have a comment in regards to EASA PAD 14-139. According to Airbus SB A320-34-1170 the new Pitot probes that must be installed is Goodrich PN 0851HL. But this PN is not mentioned in any section of EASA PAD 14-139.

I would like EASA to consider mentioning Pitot probe PN 0851HL from vendor Goodrich in the final release of this AD, as this would give better guide to the operators

about the alternative solution we have to take.

EASA response:

Comment not agreed. See answers to Commenter #3 above.

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

Commenter 5: Air Arabia Egypt – Hesham Elmougy – 13/09/2014

Comment # 5

Refer to subject PAD concerning the pitot probe replacement , and since our a/c is manufacturing in 2007 and all superseded AD's 91-227-021(B)R1, 2001-362(B) and 2002-586(B)R1 were Not applicable to our MSN 3152 as per "AD compliance list" from Airbus.

But In fact the below required action in "para. 4" needs more clarification , since we are installing probe PN C16195BA since delivery and replaced afterwards by same PN and it's not clear what is meant by "modification" in paragraph 4.1 in order to be considered !

Also we noticed that all mentioned SB's 34-1170, 34-1456 and 34-1463 which are not accessible for us on Airbus site , since access is restricted to operators who applied for RFC/RMO only,

However, all SB's are related to installation of "Goodrich P/N 0851 HL" probe , so there is a contradiction in para (4.1) , as it mentioned for aeroplanes having Thales pitot installed after mod:

- (4) After the manufacturing date of the aeroplane, do not install a Thales pitot probe P/N 50620-10, P/N C16195AA or P/N C16195BA, as follows:
 - (4.1) For aeroplanes that have a Thales pitot probe P/N 50620-10, P/N C16195AA or P/N C16195BA **installed: After modification** of the aeroplane.
 - (4.2) For aeroplanes that do not have a Thales pitot probe P/N 50620-10, P/N C16195AA or P/N C16195BA installed: From the effective date of this AD.

Thanks for clarification on this subject

EASA response:

Comments partially agreed. Paragraph (5.1) [was §(4.1) in the PAD) has been amended to state “After modification of the aeroplane **as required by paragraph (2) of this AD”**

Regarding access to SBs, please contact Airbus. See also the EASA answer to Commenter #1 above regarding the status of the SBs, and EASA answers to Commenter #3 above regarding the Goodrich probe, or alternative probes.

Commenter 6: UTC Aerospace Systems – Jim Schmitz – 06/10/2014**Comment # 6**

Background Information: Rosemount Aerospace Inc., doing business as UTC Aerospace Systems, Sensors & Integrated Systems, is the manufacturer of the 0851HL pitot probe which the PAD specifies as the approved replacement probe for compliance with the AD. (Note: UTC Aerospace Systems, Sensors & Integrated Systems was formerly doing business as Goodrich Sensors & Integrated Systems. The model 0851HL pitot probe is labeled with the Rosemount Aerospace Inc. company name.)

PAD Comments:

- 1) The PAD specifies UTC Aerospace Systems pitot probe model 0851HL as the approved replacement probe for compliance to the AD. (Note: Paragraphs (1) and (2) in the Required Action and Compliance Time section specifies replacement of the Thales probes in accordance with Airbus SB A320-34-1170 or Airbus SB-34-1456 and SB A320-34-1463; each of these referenced SB's specify the UTC Aerospace Systems pitot probe model 0851HL as the approved replacement probe). There currently exist FAA PMA pitot probes on the market, for example model 0851HL-AI, which is not a UTC Aerospace Systems pitot probe. UTC Aerospace Systems believes that caution should be exercised by operators when ordering replacement probes because the 0851HL-AI model number, and other similarly numbered FAA PMA pitot probes, are confusingly similar to the UTC Aerospace Systems 0851HL model number. There is no affiliation or connection between UTC Aerospace Systems and the manufacturers of these FAA PMA pitot probes with similar model numbers; they are different companies providing separate products, systems and services. UTC Aerospace Systems recommends that a statement be added to the AD that specifies that only the UTC Aerospace Systems model 0851HL is an acceptable replacement probe under paragraphs (1) and (2) and clarifies that pitot probes with similar model numbers from other manufacturers are not an acceptable means of compliance for the AD.
- 2) UTC Aerospace Systems is aware there are companies which offer repair services which deviate from our approved CMM for the model 0851HL pitot probe. There is no affiliation or connection between UTC Aerospace Systems and these non-UTC Aerospace Systems approved pitot probe repair companies and we do not endorse or authorize their repair services for our pitot probes. Furthermore, UTC Aerospace Systems cannot confirm that non-UTC Aerospace Systems approved repaired pitot probes meet the Airbus OEM performance specifications for the model 0851HL. UTC Aerospace Systems recommends that the AD specifically call out that the use of non-UTC Aerospace Systems approved repaired pitot probes are not an acceptable means of compliance under paragraphs (1) and (2) of this AD.
- 3) The Proposed Airworthiness Directive (PAD) Paragraph (5) under the Required Action and Compliance Time section contains a reference to "the new EASA icing requirements"; UTC Aerospace Systems recommends that a specification or standard that formally defines these new EASA icing requirements, as implemented by Airbus for the A320 airplane family, be included in this section to properly define the new icing requirements.
- 4) In the future, a FAA PMA pitot probe may be developed as a replacement for pitot probes certified to the new EASA icing requirements under paragraph (5) of the Required Action and Compliance Time section of the AD. Currently, FAA PMA pitot probes may or may not require certification to FAA TSO-C16a which specifies pitot probe testing to icing requirements which are not as robust as the new EASA icing requirements. UTC Aerospace Systems recommends EASA ensure that any future FAA PMA pitot probe intended as replacement for a EASA and/or Airbus DOA approved pitot probe certified to the new EASA icing requirements be classified as a Critical component and be confirmed by EASA to specifically meet the new EASA icing requirements, as part of the EASA FAA PMA Critical item approval process, in order to be approved as an acceptable means of compliance under paragraph (5).

EASA response:**Comments noted.**

- 1) Paragraph (6) of the AD [was §(5) in the PAD] allows installation of alternative probes under certain conditions, as specified.**

- 2) *Noted. See EASA answer to point 1) above.*
- 3) *The Notice of Proposed Rulemaking (NPA) [2011-03](#) was published in March 2011 and the related CRD [2011-03](#) was published in January 2013. In addition, [NPA 2012-22](#) dealing with the Advisory Material was published in November 2012 and the related CRD 2012-22 is expected to be published before the end of 2014. The Final Rule and Advisory Material have not yet been published; however, developments in line with Airbus specifications derived from the rulemaking proposal are on-going.*
- 4) *Considering the provisions of the Agreement between the United States of America and the European Community on cooperation in the regulation of civil aviation safety (ref. §3 .2.7 of its Annex 1 pertaining to Airworthiness and environmental certification) and of the associated FAA - EASA Technical Implementation Procedures (§2.8.2(a)(1)), EASA confirmed by letter in 2012 its direct automatic acceptance of the FAA PMA approval for the PMA pitot probe ref. 0851HL-AI for the Airbus A318-A319-A320-A321 family (TCDS No. EASA.A.064). There is no negative in-service safety record documented for this part and therefore this PMA probe is still considered an FAA approved and EASA accepted alternative P/N. For new probes in development, including PMA FAA ones, paragraph (6) of the AD [was §(5) in the PAD] allows installation of alternative probes under certain conditions, as specified. No changes have been made to the Final AD in response to these comments.*