



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-067R1

[Published on 29 September 2016 and officially closed for comments on 06 October 2016]

Commenter 1: Air Canada – Robert Giolti – 28/09/2016

Comment # 1

In reference to Table 3, Item 6: Reinforce circumferential joint between FR53.6 – FR53.7 for emergency door TYPE 1 area of the centre fuselage SB A330-53-3226; Airbus has approved the release of optimized alternate solution SB A330-53-3273.

ACA requests the final AD approval make reference to optional accomplishment of SB A330-53-3226 or A330-53-3273.

EASA response:

Comment agreed. Airbus SB A330-53-3273 was published on 28 September 2016. A reference to this SB has been added for Action 6. Operators can choose between the 2 available SBs. The final AD has been amended in response to this comment.

Commenter 2: Lufthansa Technik AG – John Donegan – 28/09/2016

Comment # 2

LHT highly welcomes the proposed effective date to be changed to 30 days after AD issue date. Thank you.

Please find the additional comments, which while repeated from our previous comments to PAD original issue, warrant further discussion due to their significant impact, even if they are still disregarded by EASA.

A. LHT does not agree with EASA decision to continue mandating A330-53-3226, while the alternative solution which will defer this action is not yet published. An AMOC would be required by each single operator, once this SB is published unless EASA and Airbus can guarantee that that SB will be issued with a global AMOC or that this AD will be revised prior to compliance times of 53-3226. EASA is likely unwilling to guarantee this.

Unfortunately, this is leaving a lot of uncertainty for airlines approaching the deadline. Additionally, AMOC process is putting extra costs and time



pressure for operators. LHT again requests, that EASA keep this SB under review. We cannot apply for an AMOC as long as the SB has not yet been published.

- B. LHT questions the reduced SMP detailed for A330-53-3263 (Action 18) for Group 32A and 32E, deviating from SB and PAD original issue.
- C. LHT strongly requests that all SBs are to be mandated in their current revision only. E.g. 53-3144 (Action 1). This should be mandated at R04. For good workmanship and best practice, EASA should not mandate an obsolete SB revision. If embodiment of previous SB revisions is acceptable for compliance (e.g. R01 is accepted), this should be stated in a note. However, for aircraft not yet modified, it is not good practice to perform an obsolete SB revision, which may contain very many errors, which might not be airworthiness concerns, have however, warranted an SB revision.
- D. Similarly, Ref Publications, it is unclear which SBs is being mandated where no revision is listed in the table. LHT assumes any SB revision can be taken. For aircraft not yet modified this is most unclear and it should be stated everywhere that the current SB revisions are to be done, unless where a previous accomplishment is done.
- E. Regarding the general opening comments concerning the fact that a single AD was issued to address 18 different unrelated SBs, we welcome EASA openness to dialogue, however, as stated in our previous comments – we already tried on several occasions to have this dialogue, with both Airbus and EASA (see comments to 2016-0035). It does not appear that further dialogue will be fruitful. the upcoming workshop will be too late to address the issues for A340 and A330 fleets. As mentioned previously, this topic was already addressed several times at Airbus operator meetings at which time clear requests were made to Airbus at which time Airbus stated that they issued individual SBs and is not in a position to dictate how EASA issues ADs and that the PAD should be commented on by operators. Indeed it is EASA decision to proceed with a single AD or individual ADs, not Airbus. Airbus has correctly issued individual SBs for WFD and not one single AD for all WFD related topics. The amount of work orders which contain this AD reference and aircraft which need to be revised is very significant.

EASA response:

- A. Comment agreed. See EASA answer to Comment # 1 above. The final AD has been amended in response to this comment.***
- B. The reduced SMP detailed for A330-53-3263 (Action 18) for Group 32A and 32E are confirmed. A revision of SB A330-53-3263 is currently being prepared by Airbus.***
- C. Comment not agreed. If the AD would require the 'current' SB revision ONLY, a dedicated paragraph would have to be added for aircraft that already have done the mod, using a previous SB issue. Instead, since no 'additional work' is identified in most SBs since the original issue, there is no point to make this specific in the AD. The exception is the case for SB A340-53-4151 – see paragraph (3) where additional work is required. In general, it may logically be expected that operators will use the current SB issue, rather than using an 'outdated' version. However, from a safety perspective, it would still be acceptable to use a previous version (no additional work). No changes have been made to the Final AD in response to this comment.***
- D. Comment not agreed. See EASA answer to point B. above. No changes have been made to the Final AD in response to this comment.***



E. Comment understood, but not agreed. Any operator can propose/request a meeting with EASA to discuss subjects like these. However, it should be clear that it is EASA policy to, as much as possible, publish a single AD for a single 'unsafe condition' (in this case, widespread fatigue damage), irrespective of where on the aircraft (ATA code) this condition may develop. The policy of Airbus is not only using ATA codes (note that all SBs in this AD have the same ATA code, 53), but also having a separate SB for each affected structural area on the aircraft. As stated before, we have addressed operator concerns about 'tracking' and recording each SB action by allocating an Action number to each SB/mod required by this AD. No changes have been made to the Final AD in response to this comment.

Commenter 3: Cathay Pacific Airways Limited – Miikka Antila – 29/09/2016

Comment # 3

Cathay Pacific much appreciate the proposal of 30 days after the effectivity date. Cathay pacific also much appreciate the grace period of 12 months and 15 months for every SB however I would like to highlight that our and MPD c-check (base maintenance) interval is 24 months.

Cathay Pacific would like to kindly comments the PAD 16-067R1 as following:

- A. Grace period should be 24 months to be in line with MPD c-check interval.
- B. For SB's 53-3144, 53-3222 & 53-3237 where additional work is required Cathay Pacific would need 24 months compliance time to be in line with c-check interval.
- C. I am repeating our request to have both FC&FH values on both columns (SR and LR) operations. In case of SR operation have both FC& FH then it must be for LR too. An asterisk mark is not acceptable, some numeric value must be provided.

EASA response:

- A. Comment not agreed. The outcome of the risk assessment has determined the maximum allowed 'exceedance' (grace period) of the applicable threshold(s) and any further exceedance would therefore not be acceptable from a risk management (i.e. safety) perspective. Regrettably, but this could cause some aircraft to be modified during an out-of-sequence hangar visit, between two normally-scheduled checks. According to European Regulation, any (further) compliance time extension (temporary exemption) would be a decision of the State of Registry authority.**
- B. Comment not agreed. See EASA answer to point A. above.**
- C. Comment not agreed. The asterisk (*), where inserted, directs the reader to Note 4 (top of page 5), which clearly states that "For the purpose of this AD, SMP limits in FH, as defined in the applicable SB, are currently not applicable, as they depend on the outcome of an Extended Service Goal (ESG) certification by EASA". Consequently, for the modifications that indicate (*) in the SMP columns of Table 3, there are no 'required' FH limits.**



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

Commenter 4: Lufthansa Technik AG – John Donegan – 17/10/2016

Comment # 3

SB 53-3273 has been issued by Airbus which is an alternative to 53-3226 (to be mandated). Please make a note in the final AD.

EASA response:

Comment agreed. A reference to Airbus SB A330-53-3226 has been introduced in paragraph (2) of the final AD.

The final AD has been amended in response to this comment.

