



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-068R1

[Published on 22 September 2016 and officially closed for comments on 06 October 2016]

Commenter 1: Lufthansa Technik AG – John Donegan – 28/09/2016

Comment # 1

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 A340-53-4218, 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 strongly requests that all SBs are to be mandated in their current revision only. 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.
- C. 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.
- D. 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 understood, but not agreed. It is confirmed that another SB is under development (not yet published), which is expected to provide an alternative method for compliance with Action 5 of this AD. However, the compliance times will likely remain unchanged and it has been decided not to delay this AD, waiting for that SB to be published. An Airbus AMOC application is envisaged and, once approved, it is expected that this AD will be revised to include a reference to that SB. No changes have been made to the Final AD in response to this comment.**
- B. 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.**
- C. Comment not agreed. See EASA answer to point B. above. No changes have been made to the Final AD in response to this comment.**
- D. 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 2: Cathay Pacific Airways – Miikka Antila – 29/09/2016

Comment # 2

This additional SB 53-4194 has been made applicable only to aircraft group 43E. Our fleet is 43B and already fully accomplished on the SB. So the question is has this 43B group been missed on the table 3?



EASA response:

Comment understood. It is to be noted that, for group 43B aeroplanes, this same modification is already required by paragraph (8) of EASA AD 2016-0035. Hence, no need to require accomplishment of this modification with this AD for those aeroplanes, as it would be redundant. No changes have been made to the Final AD in response to this comment.

Commenter 3: Lufthansa Technik AG – John Donegan – 17/10/2016
Comment # 3

- A. Action 2: the SMP for 53-5047 for 46B should be 10530 FC, not 10500 FC. If it is EASA policy to round to hundreds of flight cycles, please note that the 30 extra cycles permitted by the SB should be technically justified by Airbus and offer more relief to operators, it can affect the due date of the modification by several weeks and should not be cut short by the AD for editorial reasons. Similar for 45B.
- B. There is no lower limit of modification for 46B in the SB, although you publish it in the PAD at Note 2. Please verify. The lower limit should apply to 45B only.

EASA response:

A. Comment agreed. The SMP values in the final AD have been amended to reflect the ones specified in the applicable SB.

B. Comment agreed. The lower limit of modification (for Airbus SB A340-53-5047) for Group 46B aeroplanes has been removed in the final AD.

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

