



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-105

[Published on 15 July 2016 and officially closed for comments on 29 July 2016]

Commenter 1: Cathay Pacific Airways – Eli Woo – 25/07/2016

Comment # 1

Referring to subject EASA PAD No.: 16-105, paragraph (4) states that:

For A300-600 aeroplanes corresponding to Configuration 3 as defined in Airbus SB A300-24-6103 revision 03 or Revision 04, and on which Airbus SB A300-24-6103 Revision 03 was embodied before the effective date of this AD, within 36 months after 19 February 2014 [the effective date of EASA AD 2014-0034], contact Airbus for approved repair instructions, and within the compliance time specified in those instructions, accomplish the repair accordingly.

CPA/AHK's A300-600 airplane MSN 0683 and 0770 falls into Config. 3 as defined in SB A300-24-6103 Rev 03/Rev 04, but have not yet embodied SB Rev 03 before the effective date of this AD. Per attached Airbus Dossier 80185769/004, Airbus confirms that if MSN 0683 & 0770 have not accomplished Rev 03 of SB 24-6103, then it is not necessary to perform any repair.

For clarity and correct understanding of the AD's requirement, CPA would like to feedback to EASA that, we recommend to have a statement in the AD to state the above Airbus's advice, that is, if any aircraft(s) have not accomplished SB 24-6103 Rev 03 (before the effective date of this AD), then it is not necessary to perform any repair.

EASA response: For those aircraft that have not been modified in accordance with previous issues of the SB A300-24-6103 it is mandatory to perform actions i.a.w. the SB A300-24-6103 Rev.04.

No changes to the AD resulting from this comment.

Commenter 2: European Air Transport Leipzig (DHL) – Guido Scoor – 26/07/2016

Comment # 2

References:

/A/ EASA PAD 16-105

/B/ superseded AD 2014-0034

/C/ revised SB A300-24-6103 revision 02



/D/ SBIT 14-0044

/E/ revised SB A300-24-6103 revision 03

/F/ AD 2015-0176

/G/ Airbus ASAC 80082069-006-2015

/H/ A300-24-6103 revision 04

The German operator European Air Transport Leipzig GmbH operates 20 Airbus A300B4-622R converted freighters and 1 A300F4-622R original freighter. European Air Transport also has engineering responsibility for 4 Airbus A300B4-622R converted freighters currently operated by ASL Airlines Ireland Limited.

European Air Transport Leipzig and ASL would like to comment on the ref/A/ proposed AD. We understand the urgency of this AD and the necessity of mandating additional work associated with SFAR 88 requirements. For this very reason, European Air Transport has followed the philosophy of incorporating ref/B/ Airworthiness Directive via ref/C/ Service Bulletin revision 02 at the earliest possible opportunity during earliest possible base check of each aircraft.

As of now, instructions of ref/C/ have been accomplished within timeframe given as per ref/B/ on all of our aircrafts which was the original intention of the authority. Four of these aircrafts were in the meantime already modified as per ref/H/ SB latest revision. Five of these airplanes have the ref/E/ SB done in conjunction with ref/G/ Airbus Statement of Airworthiness Compliance which covers the authority requirements proposed in ref/A/ (because ref/E/+ref/G/ is equivalent to ref/H/).

This means in total 16 airplanes of our fleet have to be modified again, even though these airplanes already fully comply with the original directive. DHL usually performs these kinds of complex, time-consuming modifications in base check only. Seven of these 16 airplanes are fortunately in base check before ref/A/ proposed AD due date. Nine airplanes do not visit base maintenance, therefore no suitable base maintenance opportunity for accomplishment of the additional work is available which means additional ground time to rectify installation instruction failures done by Airbus during old SB revisions.

With the superseding of ref/B/ AD by EASA which asks for faulty ref/C/ SB, all operators already have been penalized as this Airbus work instruction was not correct and became mandatory and approved by EASA signature. Operators were forced to spend additional man hours to perform ref/E/ SB which was also found to be incorrect later.

Ref/D/ SBIT was for information purpose only as the due date of the AD has not been extended, even after the reporting of installation-problems which have led to work delays as Airbus has needed time to revise the service bulletin.

As a consequence, European Air Transport Leipzig and ASL would like to request to the EASA AD group to consider extending the threshold for performing the additional work required as per ref/A/ proposed AD to cover the installation delta between ref/C/ SB revision 2 and ref/H/ SB revision 4 to a minimum of 50 months after 19 February 2014 for aircrafts which have already been modified as per ref/CI. We would highly appreciate not being penalized a second time by another additional requirement due to quality issues in Airbus Service Bulletins.

These means would minimize the impact on operators which had decided to quickly perform the inspections and modifications for flight safety reasons which were later found to be not correct. Operators are already penalized by the costs of additional man hours but we would highly appreciate to avoid having these 9 airplanes on ground outside the regular scheduled maintenance.



European Air Transport Leipzig and ASL would like to thank the EASA in advance for the review.

EASA response: The comment has been reviewed and considered valid. The final AD considers 48 month instead of 36 month compliance time in para. (4) and a specific para. (5) was added.

We have amended the final AD accordingly.

