


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-087 [Published on the 26 October 2011 and officially closed for comments on the 23 November 2011]

Commenter 1: Lufthansa Technik AG – John Donegan – 04/11/2011
Comment # 1

PAD 11-087 proposes a mandatory action (modification) on the referenced MSNs in accordance with SB A310-57-2097. It is assumed that Type 21 panels are installed on all of these aircraft.

After consultation with aircraft IPC documents and subsequent confirmation with Airbus, it was determined that while Type 21 may be installed, there is a chance that Type 21R and Type 16 panels are installed on some of the affected aircraft at these locations. It was also confirmed to us by Airbus that these panels do not need replacement in accordance with SB A310-57-2097 and can remain installed.

As a result of this statement, it could be the case that the Type 11A panels do not need to be installed under all circumstances, i.e. no action/modification on the aircraft. As a result, we may have aircraft affected by the AD which remain pre-modification 13564 (MAJOR) and 13626 (MINOR). This may lead to confusion for an operator/local authority as to why a modification mandated for a particular MSN has not been performed, possibly leading to an aircraft being grounded.

We therefore recommend that an inspection to check for Type 21 panels be added, with a subsequent modification if required (depending on findings). Otherwise, a statement in the AD should be added that the modification is not required if panels other than Type 21 are found installed.

In either case, as long as there is no inspection SB to determine the installed panels, it will be difficult for the operator to show that he is compliant with SB 57-2097 (automatically recorded as post-modification at compliance limit) but has not performed any modification in the case that 21R or Type 16 panels are found. This is especially true if any inspection requirements (SB, MRBR, ALI), dependent on a/c configuration, are introduced in the future.

EASA response: Partially agreed.

The purpose of this AD is the removal of Type 21 panels from the wing positions 1 and 2 for A310-300s (Pre-MSN 500) and some ST7 A310-200s.

As Type 21 panels can be installed at other positions on the wing, it is necessary to prevent further re-installation of Type 21 panels at locations 1 or 2. Further re-installation of Type 21 panels at locations 1 or 2 is achieved by modification to the wing skin through SB A310-57-2097 or alternatively SB A310-57-2033. At the time of publication of the initial issue of the final AD, only Type 21R panel or Type 11 panel with Type 11A clamp plate can be installed in positions 1 and 2 on a modified wing.

As mentioned by the commenter, the current A310-200 and -300 Illustrated Parts Catalogue allows for installation of a Type 16 panel at wing positions 1 and 2 as an alternative to the Type 11 panel. The Type Certificate Holder is currently investigating fitment of a Type 16-like panel at positions 1 and 2 with a modified clamp plate so as to prevent any future re-installation of a Type 21 panel at those locations. Although this solution is not available in time for the initial AD issuance, this design solution will be included as an alternative to the requirements of the AD in a later AD revision; availability of this design

*solution has been found acceptable by EASA with respect to the 60 months compliance time of this AD.
The wording of the Final AD has been modified to reflect this position.*