


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 11-121 [Published on the 15 Nov 11 and officially closed for comments on the 13 Dec 11]</p>

Commenter 1: FedEx Express – Suzanne Lang – 08/12/2011

Comment # 1

To Whom It May Concern:

Please see the attached [revised](#) FedEx response to EASA PAD No. 11-121 Dated 15 November 2011. This revised document supersedes the previous sent document on 11/30/2011. FedEx discovered some pertinent information (AD 2011-23-04 requirements) which greatly increases the impact that the EASA PAD proposes. I am also including a copy of the related AD that is referenced in the revised response.

Text of letter:

“SUBJECT: EASA PAD NO. 11-121, DATED 15 NOVEMBER 2011, AIRBUS MODEL A310 AEROPLANES, FRANCE TCDS NO 145, ATA 71 ENGINE MOUNTS - FORWARD ENGINE MOUNT BOLTS - REPLACEMENT

This letter provides comments regarding EASA PAD No 11-121 which proposes the issuance of an EASA AD applicable to Airbus model A310-203 and A310-203C aeroplanes (all serial numbers) which would require the replacement of all GE CF6-80A3 engine forward mount side link bolts, centre sway link bolts, and all thrust link bolts.

General: FedEx Express concurs with the intent and scope of this PAD however we have listed our concerns under Operational Impact and Economical Impact in the paragraphs that follow.

Operational Impact: FedEx Express will experience a direct operational impact resulting from the issuance of an AD that this PAD proposes and our concerns are as noted below:

» Current Airbus SB A310-71-2037 requires engine removal to perform the mount bolt replacements, however, FedEx would also like to point out that FAA AD 2011-23-04 is required at every exposure of the forward mount side links. See Paragraph (g) below from the AD:

Definition of Exposure of Side Link

(g) A side link is exposed when one or more bolts that attach the side links to the fan frame-front high-pressure compressor case are removed or when the bolt attaching the side link to the mount platform is removed.

o If even one side link bolt is removed (which would result from the issuance of the proposed AD), the current AD requires inspecting, stripping and reapplying Sermetel W coating on the side links. Therefore, we would not only have the burden of an engine change, but the removal and replacement of the forward mount assembly as well. Both

would have a huge operational impact and add an unnecessary burden to our overall maintenance operation.

» FedEx is concerned with the availability of the forward mount hardware that would be required to perform the proposed AD. We would like the assurance that there would be sufficient hardware available prior to the issuance of the AD.

» Fed Ex is concerned with the proposed 18 month compliance time requirement. This requirement will lead to unnecessary engine removals which involve a risk of increased labor and materials cost and increased aircraft out of service time. FedEx proposes a more manageable compliance time of 36 months or allow the subject bolts to be removed and replaced at engine shop visits or other convenience removals.”

Economical Impact: This proposed AD will definitely have a direct economical impact to Fed Ex Express,

This is due to the following:

> New hardware procurement requirements per the proposed AD.

> Removed forward mount assembly inspection requirements; side link Sennetel W recoat requirement and labor to inspect and reassemble mount assembly for return to service.

> Spare forward mount assemblies needed to support the mount changes.

> Increased labor due to the engine removals, mount removal. pre and post engine reinstallation inspection requirements, etc.

> Aircraft out of service time due to engine removals.

Fed Ex currently operates 18 A310-200 aircraft with the affected CF6-80A3 powered engines installed. FedEx has 10 additional spares for a net total of 46 engines.

Summary: The proposed AD will directly affect FedEx maintenance operations as described in the preceding paragraphs.

Regards

EASA response:

FedEx's comments are noted.

FAA AD 2011-23-04 and EASA AD 2012-0056 address two distinct identified unsafe conditions. Although EASA understands the economic and operational impacts both ADs may have for any operator, the unsafe condition that is addressed through EASA AD 2012-0056 cannot justify an extended reaction time to be corrected.

Although the CF6-80A3 engine front mount was certified as a fail-safe design, some certification assumptions have been invalidated by recent & updated fatigue analyses, which accounted for new lift-off loads. As a result of these analyses link bolts life limits revealed to be much lower than those determined at time of certification. Fleet data in possession supported a quick and realistic reaction time such as that in EASA AD 2012-0056. Therefore the 18-month reaction time will remain unchanged in EASA AD 2012-0056

At time of the EASA AD publication, EASA received confirmation that the engine manufacturer was able to provide within the reaction time given in EASA AD 2012-0056, all operators of CF6-80A powered A310 series aeroplanes in service with the necessary hardware, assuming the operators will plan the replacement and order the bolt in advance.

For all reasons mentioned above, the AD will remain unchanged.