


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 12-046</p> <p>[Published on 15 May 2012 and officially closed for comments on 12 June 2012. Republished as EASA PAD 12-046 R1 on 28 February 2013 and officially closed for comments on 14 March 2013]</p>

Commenter 1: Ken DICKENSON – 03 June 2012

Comment # 1

COMMENTS ON PAD 12-046:

- Throughout PAD Section 'Required Actions and Compliance Times', users are asked to comply with the requirements of A310 ALS Part 4 revision 01. In the Section 'Ref Publications', users are directed to A310 ALS Part 4 revision 02. Has this manual been re-issued to Revision 02?
- The PAD 12-045 'Required Actions and Compliance Times' clearly distinguishes between new (New Requirements of this AD) and old requirements (i.e. Re-statement of DGAC AD F-2005-123). There is no such separation in the same section of PAD 12-046.

It is felt that consistency of the structure of this section could eliminate any possibility of confusion.

Conclusion: We believe that the proposal presented in the PAD 12-046 could regrettably contribute to the confusion and could potentially lead some aeroplanes to be operated beyond the operational life currently justified for the A310 systems.

EASA response:

Comments partially accepted.

First, it must be re-emphasized that ALIs are both part of the Type Certificate (21A.41) and also the Type Design (21A.31 (a)(3)). Therefore any violation or “involuntary” deviation (claimed by the commenter(s)) to the content of the ALS entails a non-compliance of the individual aircraft to the approved Type Design. This non-compliance entails the invalidation of the aircraft individual Certificate of Airworthiness. Hence the obligation to comply with all limitations contains therein and ensure by means of appropriate means of Continuing Airworthiness management that each and every limitation is accomplished in due time as published in the AD/ALS. (See also Part M.A.302 and AMC M.A.302 (3))

Second, reference in the Section 'Ref Publications' to A310 ALS Part 4 revision 02 was a typographical error at the time of the initial PAD 12-046 publication. For this particular error we have amended the final AD accordingly.

The mandatory instructions and airworthiness limitations applicable to the Ageing Systems Maintenance (ASM) are specified in Airbus A310 or A300-600 ALS Part 4 documents, which are approved by EASA.

A310 ALS part 4 mentions “The life extension study allows continued operation of the A310 systems up to the current Limit Of Validity (LOV) i.e. 85000 Flight Hours or 40000 Flight Cycles, whichever occurs first.” And Paragraph 1 of the A300-600 ALS Part 4 document also mentions the systems operational life

Quote***(1) Operational life applicable to A300-600 systems installations***

<i>Aircraft types Operational life</i>	<i>Flight Hours (FH)</i>	<i>Flight Cycles (FC)</i>
<i>A300-600</i>	<i>89 000 FH</i>	<i>51 000 FC</i>
<i>A300-600ST</i>	<i>63 000 FH</i>	<i>36 000 FC</i>

(2) Operational life applicable to A300-600 landing gear retraction actuator chain

<i>Aircraft / LG</i>	<i>Landing gear Operational life</i>
<i>A300-600 MLG</i>	<i>76 600 landings</i>
<i>A300-600 NLG</i>	<i>65 700 landings</i>
<i>A300-600ST MLG</i>	<i>46 000 landings</i>
<i>A300-600ST NLG</i>	<i>50 000 landings</i>

Unquote

As a consequence, the text of the final AD was amended to correct the typo and highlight the new requirements.

However to account for the new publication of the A310 ALS Part 4 revision 02, PAD 12-046 has been revised and was re-submitted for a short consultation period.