

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-135

[Published on 07 September 2020 and officially closed for comments on 21 September 2020]

Commenter 1: Singapore Air – Douglas Ho – 08/09/2020

Comment # 1

With reference to PAD 20-135, I have the following comment and query:

- A. The affected cargo lining panels may have been installed on the aircraft due repair due aircraft operation. With the deletion of EASA AD 2020-0100's paragraph 1; DET inspection of the affected part in accordance with the instructions of the applicable SB, it may be difficult to positively detect an affected lining panel that may be still installed on the aircraft. I would suggest to re-instate paragraph 1 of the EASA AD 2020-0100.
- B. With reference to the Repair Prohibition in Paragraph 5 of PAD 20-135, Would appreciate EASA advice whether Speedpatch AF800 series could be used for "damage-through" repair of a affected panel if the repair is accomplished with an approved Airbus repair instructions/maintenance procedures as listed in Table 1 of the PAD, or in accordance with the instructions of the applicable SB.

EASA response:

- A. **Comment not agreed. Indeed, the inspection is no longer required since it is for identification only, not for cause (e.g. cracks, damage, etc.). If an operator considers that an inspection is the only reliable method to determine if an affected part is installed, that operator has the freedom to accomplish that inspection.**
- B. **Comment noted. EASA confirm that instructions of the applicable SB, or use of Speedpatch AF800 series Repair Instructions/Maintenance Procedures according to AMM, as listed in Table 1 of the revised AD, are acceptable to repair "damage-through" of affected panels.**

No changes have been made to the revised AD in response to this comment.

Commenter 2: British Airways – Esme Loweth – 09/09/2020**Comment # 2**

BAW understands that this PAD deletes all the requirements of Para. (1) 'Inspection(s)' from AD 2020-0100. BAW does not disagree with removing the mandatory requirement for a DET to identify the location of any affected parts. However, BAW believes that an alternative statement should be provided, which gives another means of compliance for identifying affected parts. For example, the AD should include a statement confirming that aircraft records are an acceptable method for identifying Group 1 aircraft.

EASA response:

Comment noted but not agreed. The inspection is no longer required by this revised AD. Hence, EASA consider that there is no need to introduce an alternative statement such as allowing aircraft maintenance records. For EASA, any method is acceptable, provided it achieves the purpose to make a proper and reliable identification of affected parts. See also EASA answer to Comment #1, Point A above.

No changes have been made to the revised AD in response to this comment.

Commenter 3: Delta Air Lines – James Thompson – 18/09/2020**Comment # 3****References:**

- (1) EASA Proposed Airworthiness Directive (PAD) 20-135: Cargo Compartment Lining Panels – Repair / Replacement (Dated 07SEP20)
 - (2) Notice of Proposed Rule Making (NPRM): Docket No. FAA-2020-0673; Directorate Identifier 2020-NM-076-AD (Dated 21JUL20)
 - (3) EASA Airworthiness Directive (AD) 2020-0100: Cargo Compartment Lining Panels – Inspection / Repair / Replacement (Dated 05MAY20)
 - (4) Airbus Service Bulletin (SB) A330-25-3743 Rev Orig (Dated 23SEP19)
 - (5) Airbus Service Bulletin (SB) A350-50-P006 Rev Orig (Dated 30OCT19)
- A. REF (1) deletes the inspection requirement previously mandated by REF (3). With this requirement removed from the proposed EASA AD revision, DAL notes that all operators must now comply with all corrective actions in the applicable inspection bulletins, SB REF (4) and REF (5), without being prompted to do so based on inspection results. Not mandating this inspection adds risk to ensuring this discrepant repair condition is corrected on all linings on each aircraft; an operator could inadvertently miss reworking a discrepant lining if there were any sort of error/omission with



reporting/documentation of previous repairs via non-routine cards and the log page system (causing a given lining to be classified in Group 1 vs. Group 2). Note that these linings are not rotatable parts, so there is no component level tracking established for each individual lining on a given aircraft. Additionally note that in total there are over 100 linings installed on an aircraft, with several possible part numbers that could be installed for each lining location.

Having a comprehensive understanding of what linings have been repaired (i.e. Group 1 or Group 2) is very difficult given the high volume of linings per aircraft, the variety in part numbers that could be installed for each lining, and that these linings are not rotatable parts (i.e. have less robust part/repair tracking per lining).

DAL can conservatively inspect all linings on all aircraft per the instructions of the applicable SBs, regardless of the definitions of Groups 1 & 2 and regardless of the deletion of the Para (1) inspection requirement. Doing so will ensure there is no omission of lining rework, as required by Para (2). However, DAL wanted to shed light on the increased risk that is potentially introduced by including Group definitions and deleting the inspection requirement so EASA can review and revise as required. Note that as discussed above, DAL believes the following two things potentially introduce risk to AD compliance:

(1) Defining Groups 1 & 2; or (2) Deletion of the inspection requirement from Para (1).

- B. REF (1) Para (2) defines corrective actions that should be applied to all linings that have been previously repaired with the discrepant repair method. DAL notes that the subject SB's, REF (4) and REF (5), each contain two separate sections, with each section given in Required for Compliance (RC) format. Subject SBs include the following sections:

(1) Inspection/rework of all cargo liners installed on applicable aircraft

(2) Inspection/rework of all cargo liners in the shop/workshop/inventory

Additionally, these bulletins include the following notes in each of the above-mentioned sections:

"NOTE: This Service Bulletin is classified mandatory or expected to be classified mandatory by an Airworthiness Directive (AD). The paragraphs 3.C. and 3.E. in these accomplishment instructions are Required for Compliance (RC) and must be done to comply with the AD. To allow more flexibility, the rule "refer to" and "in accordance with" will apply to these paragraphs 3.C. and 3.E. Other paragraphs are recommended and may be deviated from, done as part of other actions or done with accepted methods different from those given in the Service Bulletin, as long as the RC paragraphs can be done and the aircraft can be put back into a serviceable condition.

NOTE: This Service Bulletin contains the instructions for the on-aircraft maintenance necessary to ensure the continued airworthiness of the aircraft. For any deviations to the instructions, including RC paragraph contained herein, contact AIRBUS for further instructions and approval."

Each section mentioned above contains separate sub-tasks (all within Para 3.C. instructions) that specify inspection and repair instructions separately. For example, REF (4) includes the following breakdown of subtasks within Para 3.C.:

- A330-A-25-XX-3743-01001-311A-A – Detailed Insp of the FWD Compt Linings



- A330-A-25-XX-3743-02001-311A-A - Detailed Insp of the AFT Compt Linings
- A330-A-25-XX-3743-03001-311A-A - Detailed Insp of the Bulk Comt Linings
- A330-A-25-XX-3743-01001-520A-A - Remove an Identified Lining
- A330-A-25-XX-3743-01001-690A-C - Repair the Lining (Depending on the Inspection Result)

Based on the verbiage of Para (2) in REF (1) and the example sub-tasks provided above, DAL believes only accomplishment of A330-A-25-XX-3743-01001-690A-C would be required for compliance on A330 aircraft/affected panels, even though all of the sub-tasks above are considered RC tasks and seemingly must be accomplished per the verbiage in the SBs' notes.

Once this impending EASA AD revision is issued as a final rule, an FAA NPRM/AD will then be issued that specifies all RC Paragraphs must be accomplished without deviation. As it currently stands, the REF (1) only requires partial accomplishment of RC Para 3.C. in each affected SB. This does not necessarily align with the SB notes given above or the impending FAA AD requirement to accomplish all RC steps in referenced Service Information with no omissions or deviations. To ensure there is no conflict between the impending EASA AD revision and the SB notes/future FAA AD's requirements, DAL kindly requests either:

(1) The Para (1) inspection requirement is re-instated to ensure all RC steps can be accomplished without omission or deviation; or (2) A new Table (or list) is added to Para (2) that specifies exactly which sub-tasks (in each SB, e.g. A330-A-25-XX-3743-01001-690A-C) are required for compliance to the AD and the SBs are revised to more clearly state that corrective action is the only section required for compliance.

- C. DAL understands that the ability to apply a repair deferral per the Minimum Equipment List (MEL) was previously given in Para (2) and has since been removed in REF (1). DAL believes that this allowance was most likely removed because the inspection requirement is no longer present and hence, there is no scenario where an inspection would take place, the discrepant repair would be found, and the MEL could be applied to defer repair rework. As DAL has been supportive of adding the Para (1) inspection requirement back into the final EASA revised rule in the previous two comments, DAL requests that if the inspection requirement is reinstated, please also revise Para (2) to include the MEL deferral option for repair.

EASA response:

A. Comment noted but not agreed. See EASA answer to Comment #1, Point A above.

B. Comment noted. In EASA system, only requirements specified in an AD must be accomplished. It should also be noted the AD does not refer to RC markings as differences between AD requirements and SB instructions are possible.

C. Comment noted. It is correct that the allowance to apply a repair deferral per the Master Minimum Equipment List (MMEL) was removed because the inspection is no longer present in the AD revision. As this is now confirmed, EASA see no need to include the MMEL deferral option for repair. The purpose of the MMEL item is to provide fly on time when cargo lining panel is found damaged or otherwise unserviceable. The determination that an affected part is installed does not trigger the application of the MMEL item.

No changes have been made to the revised AD in response to this comment.



