

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2024-0092

[Published on 19 April 2024 and officially closed for comments on 17 May 2024]

Commenter 1: FedEx Express – Eric Macaraniag – 17/05/2024

Comment # 1

- A. The proposed Airworthiness Directive (AD) will be effective for sixty eight (68) A300-600 model airplanes operated by FedEx Express.
- B. FedEx would like to request clarification in the operational limitations in Ref /A/(1): “From the effective date of the AD, do not operate the MD CD door with opening angle exceeding 70 degrees”. Per A300-600 AMM 52-36-00 PB 201 normal closing of the MDC door has a note stating “Initially the MDC door moves in the open direction for approximately 15 sec. so that the catch hook of the door actuator is released. Then the MDC door moves automatically in the close direction “ This door closing sequence moves the door exceeding 70 degrees opening angle that could result in compliance with the AD.
- C. FedEx would like to request another set of NDT inspection method on the MD CD bearing lugs that will extend the inspection threshold and intervals requirement of Ref /A/(2) to next available C- check. This will provide relief in short compliance time in Ref /A/(2) and be able to schedule the aircraft to a suitable base location for inspection and replacement of MD CD crack bearing fittings with proper tooling, manpower, and parts availability.
- D. The number of man-hours and elapsed time for inspection will not impact the overall span-time of our planned scheduled maintenance check. However, if any crack(s) findings are noted, replacement of both MD CD bearing fittings are required before flight and significant downtime will be required. Therefore, there will be impact to available lift.

EASA response:

A.: Not a comment.

B.: Comment noted. The limitation imposed by paragraph (1) of the AD does not apply to the MD CD opening during the door closing sequence, during which the MD CD due to specifics of the door opening/closing mechanism kinematics slightly exceeds the 70-degree opening angle for a short period. The intention of the AD limitation is not to set the MD CD position intentionally in more than 70-degree.

AD 2024-0092 was revised in response to this comment adding a clarifying Note.



***C.: Comment noted. EASA recommends contacting Airbus for further alternative methods to comply with the AD.
No change has been made in the AD 2024-0092 in response to this comment.***

***D.: Comment noted. At the time of the AD issuance there was no risk assessment available allowing to extend the rectification interval.
EASA recommends contacting Airbus in order to investigate the possibility to obtain AMOC for individual cases.
No change has been made in the AD 2024-0092 in response to this comment.***

