

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2024-0247

[Published on 18 December 2024 and officially closed for comments on 15 January 2025]

Commenter 1: Bangkok Airways Public Company Limited – Butsakorn Satittheeratham – 20/12/2024

Comment # 1

As per the previous Email, on BKP fleet, we have identified 3 affected parts and all of these parts have already been modified with new part number. Could you please clarify that upgraded P/N should be considered as the affected part under EASA AD No. 2024-0247?

EASA response:

Comment agreed. A THSA having a serial number listed in the appendix whatever the part number is to be considered as an affected part. The P/N is for indication only. The AD was superseded accordingly and Appendix 1 was added to the AD, in response to this comment.

Commenter 2: Cambodia Airways – Li Kai – 26/12/2024

Comment # 2

Dec 2024, and we cannot get VSIL FA3T1-27-04 original issue dated 06 August 2024 from Collins (please kindly find the attachment). I'd like to know if we can refer to VSIL FA3T1-27-04 dated 23 Dec 2024.

EASA response:

Comment noted. Unfortunately, we are not able to provide you with those documents, as it is intellectual property of the TC Holder and, as such, EASA cannot share it with third parties. We recommend you to contact the TC Holder. No changes were made to the Final AD in response to this comment.



Commenter 3: Cham Wings – Ammar Kiwan – 09/01/2025**Comment # 3**

In order to comply with AD 2024-0247 requirements, we need VSIL FA3T1-27-04 to determine if our THSA are affected or not. Since this issue is related to safety, could you please provide us with VSIL FA3T1-27-04 or at least, the list of affected THSA.

EASA response:

Comment noted. Unfortunately, we are not able to provide you with those documents, as it is intellectual property of the TC Holder and, as such, EASA cannot share it with third parties. We recommend you to contact the TC Holder.

No changes were made to the Final AD in response to this comment.

Commenter 4: American Airlines – Neil Gary – 09/01/2025**Comment # 4**

References:

/A/ EASA AD 2024-0247

/B/ Collins Aerospace VSIL FA3T1-27-04

American Airlines (AAL) commends EASA for acting proactively to ensure Trimmable Horizontal Stabilizer Actuators (THSA) are delivered to operators from Collins Aerospace and/or its vendors with accumulated life times properly calculated.

AAL has reviewed the Ref /A/ EASA AD, and has the following comments:

AAL notes that Ref /A/ defines an "Affected part" as "Trimmable Horizontal Stabilizer Actuators (THSA) having a Part Number (P/N) and serial number (s/n) as listed in the VSIL, except those for which the accumulated life has been recalculated as required by this AD."

The VSIL referred to is Ref /B/.

AAL also notes that the modification paragraph (1) of Ref /A/ states "For Group 1 aeroplanes:

Within 30 days after the effective date of this AD, contact Collins Aerospace for approved instructions and accomplish those instructions accordingly within the compliance time specified therein."



AAL operates several of the affected THSAs as defined by Ref /A/. When this issue was recognized by Collins Aerospace, Collins Aerospace provided corrected Authorized Release Certificates (FAA 8130 tags) for the affected parts, with corrected Total Flight Cycle and Total Flight Hour information. However, Collins Aerospace did not provide any additional approved instructions, such as an RDAF or similar; nor was any compliance time specified.

Additionally, while the definition of an "Affected part" mentions recalculating the accumulated life of the part as required by Ref /A/, no specific instruction for doing so is provided within the AD.

Since receiving the corrected Authorized Release Certificates from Collins Aerospace for the AAL affected THSAs, AAL has either recalculated the total flight time hours and cycles as required by Ref /A/, or removed the THSA from service and replaced with a part eligible for installation as required by Ref /A/ Modification paragraph (2). AAL therefore believes we are fully compliant with the requirements of Ref /A/, even though no specific approved instructions were received from Collins Aerospace as stated in Ref /A/ Modification paragraph (1).

AAL kindly requests EASA consider revising Ref /A/ to clarify that recalculating the Total Flight Cycles and Total Flight Hours on an affected THSA, based upon a corrected and approved Authorized Release Certificate, FAA 8130 or EASA Form 1 provided by Collins Aerospace, is sufficient to comply with the requirements of Ref /A/ paragraph (1).

EASA response:

Comment partially agreed.

The definition of an affected part states clearly that parts for which the accumulated life has been recalculated as required by this AD are exempted from this definition. Corrected Authorized release certificates for the affected parts are considered approved instructions.

If this was done before the effective date of this AD, following provision in the AD can be used to show compliance "Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished". Collins may have resent all Form 1 before the publication of the EASA AD to airlines. Any THSA for which an EASA Form 1, including correction of the accumulated life, was issued on, or after, the shipping date, as identified in Appendix 1 of this AD, is considered a serviceable part.

Note 1 was added to the superseding AD in response to this comment.

