


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p align="center"><b>EASA PAD No. 14-121</b>  <b>[Published on 25 July 2014 and officially closed for comments on 08 August 2014]</b></p>

**Commenter 1: Cathay Pacific Airways Limited – Christopher Tse – 28.07.2014**

**Comment # 1**

1. Under “Required Action(s) and Compliance Time(s)” paragraph (2) amended as shown below to better clarify the requirements:

Table 2 – NBB Life Limit Reduction

Date	NBB Life Limit
31 July 2014	20 000 FC
31 January 2016	16 000 FC
31 July 2017	14 000 FC
31 July 2018	12 000 FC

This should also be carried forward to the table 3 and 4 in “Required Action(s) and Compliance Time(s)” paragraph (3) and paragraph (4).

2. Under “Required Action(s) and Compliance Time(s)” paragraph (5), subject paragraph should be re-worded as shown in the example below:

*From each date specified in Table 5 of this AD, as applicable, it is allowed to install a THSA fitted with new NBB on an aeroplane, provided the NBB has not exceeded the corresponding number of FC specified in Table 5, as applicable to the aeroplane type/model.*

*NOTE: The life limits as specified in the current revision of ALS Part 4 are still relevant to the affected THSA.*

**EASA response:**

**Comment agreed. EASA PAD 14-121R1 addresses the NBB replacement at THSA level. All above paragraphs as specified by the commenter have been re-drafted accordingly.**

**Commenter 2: Deutsche Lufthansa AG – Brigitte Gilles – 31.07.2014**

**Comment # 2**

The paragraphs (1) and (2) describe the required actions for A330 and A340-200/300 aeroplanes, but there is also listed the SB A340-27-5062, which is only applicable

for the A340-500/600. At paragraph (3) is the opposite . This paragraph is applicable for A340-500/600, but there are also listed the SBs for A330 and A340-200/300.

**EASA response:**

**Comments agreed. The reference to Airbus SB A340-27-5062 has been deleted from paragraph (2) of EASA PAD 14-121R1. The same update has been done in paragraph (3).**

**Commenter 3: UTC Aerospace Systems – Didier Cadoret – 08.08.2014**

**Comment # 3**

This proposed AD is aimed to mandate the replacement of No Back Brake NBB disks at various FC limits. We believe the wording of the AD should be precised to ease operators understanding. Those FC limits should be “the FC accumulated by the THSA NBB on each corresponding date ..... ” as mentioned in para Part A page 2 , so that those FC are those accumulated by the THSA unit since first installation on an aeroplane or last NBB disks replacement.

In particular the wording of Part B page 3 should be changed as it could confuse the operator by looking at “THSA NBB since first installation” only.

We suggest the wording to be changed to “THSA NBB since first installation or last NBB disks replacement”.

In the same way the tables 4 and table 5 page 4 should be changed to “Life Limit ( FC accumulated by the THSA NBB since first installation on an aeroplane or last NBB disks replacement )”.

For THSA units fitted on A340-500 or A340-600 a list of THSA SNs for which the NBB disks have already been replaced ( thus changing the FC counting datum point ) have been published to operator in VSB 47175-27-10

**EASA response:**

**Comment understood. EASA PAD 14-121R1 has been published to clarify. The threshold (FC accumulation computation) has been changed and applies to the THSA itself and not to THSA NBB because operators do not know the FC accumulated by the NBB. See also answer to Comment #1.**

**Commenter 4: UTC Aerospace Systems – Didier Cadoret – 08.08.2014**

**Comment # 4**

The proposed AD has been further reviewed internally and a potential operator mis-understanding has been identified.

The THSA NBB disks are affected by an FC operational limit which lead to the disk replacement by new parts , ie after NBB disks replacement the THSA is airworthy for another in-service run.

This NBB limit comes on top of the entire THSA unit life limit ( FH , FC , calendar ) which remain valid because they are associated to other THSA sub-component different that the NBB disks ( screwshaft , hyd motors , gears etc .... ).

This situation has already been published to operator in AD 2013-0144 R1 note 3 page 2 , it is said “the life limit as specified in the current revision of ALS part 4 are

still relevant for the affected THSA , as applicable to aeroplane model and THSA PN“.

We feel that in order to ease operator understanding of the situation the last part of note 3 page 2 PAD N° 14-121 should be deleted i.e. “until the new life limit ( see paragraph (4) of this AD come into force or the ALS is revised to include those limits )“.

Additionally we feel that the wording “ life limit “ should be restricted to the entire THSA unit life limit ( FH , FC , calendar ) and that another wording should be used to describe the NBB disks replacement.

We may proposed “ NBB disks operational limit “ or “ periodic replacement of the NBB disks “ as already published in AIRBUS OIT 999.0033/13 Rev 1 para 3.2.

Consequently we believe that the wording “ life limit “ should be replaced when irrelevant, in particular in table 2 and 3 page 3 , in para ( 4 ) Part C and in table 4 and 5 page 4 as it does not apply to the entire THSA but to the NBB disk only.

**EASA response:**

**See answer to Comment #1 and to Comment #3 from same commenter.**

**Commenter 5: Qantas Airways Limited – Anthony Ke – 11.08.2014**

**Comment # 5**

Please see attachment for comments / suggestions from QFA for improvement to this PAD.

Amend paragraph (2) of the RACT section as follows:

Not later than the date specified in Table 2 of this AD, as applicable, replace each affected THSA NBB having reached...etc.

Amend the title for Table 2 – THSA NBB Life Limit Reduction

Amend Table 2 as follows: **Life Limit** (FC accumulated by the THSA NBB since first installation on an aeroplane)

Amend paragraph (3) of the RACT section as follows:

Not later than the date specified in Table 3 of this AD, as applicable, replace each affected THSA NBB having reached or...etc.

Amend the title for Table 3 – THSA NBB Life Limit Reduction

Amend Table 3 as follows: **Life Limit** (FC accumulated by the THSA NBB since first installation on an aeroplane)

Amend paragraph (5) of the RACT section as follows:

After each date specified in Table 2 and 3 of this AD, as applicable to aeroplane type/model, it is allowed to install a THSA on an aeroplane, provided the part has not exceeded the corresponding number of FC specified in Table 2 and 3, as applicable to aeroplane type/model.

The amendment of paragraph (5) as above allows the deletion of Table 5 of the AD.

In addition, QFA would like to take this opportunity to seek clarification on the following?

1. Is THSA 47172-530 considered affected by this PAD? THSA 47172-530 is not affected by EASA AD 2013-0144 Revision 1 as it was not listed in the effectivity of Airbus AOT A27L005-13. However, this PAD now contains ‘*Note 1: The THSA affected by the requirements of this AD are those identified by P/N in Airbus Service Bulletin (SB) A330-27-3199 .....’* and that Airbus SB A330-27-3199 does identify THSA 47172-530 although ALS Part 4 (Variation 4.2) is referenced for accomplishment of NBB disk replacement. It may be worth amending both *Note 1* and *2* of this PAD to make them more comprehensible.

2. Is it the intent of this PAD to mandate the inspection reporting requirements stated in Paragraph 3.C.(1)(b) of Airbus SB A330-27-3199? Or have these

requirements simply been carried forward from the superseded Airbus AOT A27L005-13? They should no longer be required given that initial reports were previously made in accordance with Airbus AOT A27L005-13.

***EASA response:***

***Comments agreed, in general.***

***In particular, for your point 1, EASA PAD 14-121R1 has been redrafted to clarify. For your point 2, the reporting action has not been embodied in the revised PAD, therefore, it will not be required.***