


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 14-121R1</p> <p align="center">[Published on 06 November 2014 and officially closed for comments on 20 November 2014]</p>

Commenter 1: Singapore Airlines – Cheekheong (Jimmy) Aw – 07/11/2014

Comment # 1

Below are the comments for EASA PAD 14-121R1.

1. The words "but not later than the thresholds specified in Table 2 of this AD" in paragraph (1) is not necessary as the paragraph starts with "Within the compliance times as specified in Table 2 ...". Moreover, the author may mean Table 3 instead of Table 2 in the above.

Part A - For A330 and A340-200/-300 aeroplanes

(1) Within the compliance time as specified in Table 2 of this AD, depending on the FC accumulated by the THSA on 31 July 2013 [the effective date of EASA AD 2013-0144 at original issue], but not later than the thresholds specified in Table 2 of this AD, depending on the FC accumulated by the THSA on each corresponding date specified in Table 2 of this AD, replace

2. The intent of Paragraph (2) Table 3 is to align with the NBB reduction in life limit. However, the required action poses an undue burden on the operator to check the FC of THSA before the stated dates and replace the THSA with a serviceable one as required.

May I suggest that a column such as below to be provided:

FC of THSA as at 31 July 2013	Replace with serviceable THSA
12000FC to less than 16000FC	- 31 July 2014 or 20000FC whichever later
8000FC to less than 12000FC	- 31 January 2016 or 16000FC whichever later
4000FC to less than 8000FC	- 31 July 2017 or 14000FC whichever later
New to less than 4000FC	- 31 July 2018 or 12000FC whichever later.

Less than 16 000 FC	as specified in paragraph (2) of this AD
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- (2) Not later than the date specified in Table 3 of this AD, as applicable, for THSA having reached or exceeded on that date the corresponding number of FC as specified in Table 3 of this AD, replace the THSA with a serviceable unit in accordance with the instructions of Airbus SB A330-27-3199, or SB A340-27-4190, as applicable to aeroplane type and model.

Table 3 – THSA Removal for NBB Disks Replacement

Date	THSA FC Limit (since first installation on an aeroplane)
31 July 2014	20 000 FC
31 January 2016	16 000 FC
31 July 2017	14 000 FC
31 July 2018	12 000 FC

EASA response:

Comment #1 point 1 agreed. Paragraph (1) of PAD 14-121R1 erroneously referred to thresholds and dates in Table 2. The Final AD has been changed to make reference to Table 3 for these aspects.

Comment #1 point 2 not agreed. Except for A430-500/-600 aeroplanes, THSA FC monitoring was already a requirement since AD 2013-0144 was issued and therefore cannot be considered an ‘undue burden’ introduced by this AD. Paragraph (2) requires THSA replacement not later than the date specified in Table 3, if on that date the corresponding FC limits has been reached or exceeded. The FC limits in Table 3 are independent of those accumulated on 31 July 2013.

Please also note that paragraph (4) of the AD contains a complimentary requirement, to be accomplished from each specified date (Table 3 or 4, as applicable) onwards, to remove a THSA before it exceeds the corresponding FC limit. No changes have been made to the Final AD in response to this comment.

Commenter 2: FAA – Vladimir Ulyanov – 07/11/2014

Comment # 2

Paragraph (4) states that “From the date, and before exceeding the corresponding FC limit...” Please clarify what “date” should be considered. Is it a date when the AD becomes effective or date specified in the table 3 or table 4?

EASA response:

Comment agreed. The sentence has been re-worded in the Final AD to avoid misinterpretation or misunderstanding.