


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-177R1</p> <p>[Published on 11 February 2015 and officially closed for comments on 25 February 2015]</p>

Commenter 1: German Wings – Gerald Weidenbrueck – 11/2/2015

Comment # 1

With regards to PAD 14-177R1 I would like to take following into account:

The AOT released by Airbus requires to perform a check of certain doubler repairs in a very short time. Most of the inspections and checks can be done during line maintenance, or night stops. The only problem what I see is the fact that repairs underneath the belly fairing are of those that require more access to have them check for existence and for cracks using NDT methods. To avoid a burden to the operator, I would like ask to change only this area to have an alleviation until next Base or C-Check. This gives more flexibility to the operator, especially in nowadays in regards to commercial reasons. At the same time at heavy the entire NDT inspections can be done for those doublers hidden by the fairing. This would be of course an advantage for the operator.

EASA response:

Comment not agreed.

The Airbus AOT was issued on 22 July 2014, while PAD 14-177 was issued on 19 December 2014, thereby clearly indicating EASA intention to require the actions as described in the AOT. It is considered that these signals have given operators ample time to schedule the necessary actions.

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

Commenter 2: All Nippon Airways – Hideyuki Kato – 19/2/2015

Comment # 2

ANA would like EASA and Airbus to review the following case for the AD as follows:

If there is not available repair record of external doubler on 1.2 mm fuselage skin area, one time inspection (USI or LFEC) is performed within 350FC from issued EASA AD or AOT A53N007-14.

And then, if no damage is found [in] the inspection area in accordance with AOT A53N007-14, the existing doubler should be clarified by AIBUS within ***FC or refurbished within ***FC per current SRM. ANA notes that '*** FC' should be assigned by AD or AOT. Current AOT and PAD are not described above case. Please review and create the above grace period.

Please understand that same requirements is issued as Japanese law as TCD, if issued EASA AD.

EASA response:

Comment not agreed.

The AD requires a one-time inspection, and only if during that inspection, any crack is detected, corrective action is required (§4 of the AD).

If no damage is found in the repaired area, the AD does not require any further action. However, as the Note indicates, for any repaired area, the existing SRM-specified post-repair inspections remain valid and should not be discontinued.

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