

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-057 [Published on 05 May 2015 and officially closed for comments on 18 June 2015]

Commenter 1: Qantas Airways Limited – Wayne Nelson – 24/05/2015

Comment # 1

Currently, MSN026 is undergoing the Retrofit in accordance with the required actions of the proposed AD. QANTAS is aware that variations to the Ref. Publications have been necessary during this, our first embodiment of this Modification. Being on-site for this activity, It has become clear that:

- a) This is a complex retrofit;
- b) Each MSN can contain subtle differences which can directly impact the direct installation of the Post MOD hardware;
- c) It is intended that operators/MRO's will ultimately take responsibility for embodiment of this retrofit on their fleets;

Taking the above observations into consideration and not withstanding that variations have already been necessary on MSN 026 as mentioned above, QANTAS requests a generic AMOC statement be included in the AD, approving variations to any of the SB's listed that have been approved by Airbus Repair Design Approval Sheet (RDAS), Technical Disposition (TD) or TA as applicable. (ie. Similar to the approach with AD 2013-0108R2).

EASA response: The AD will incorporate an additional paragraph and a note to clarify that if, during modification of an aeroplane as required by paragraph (1) of this AD, any discrepancy (see Note) is detected, which makes the accomplishment of any part of the modification instructions impossible, before next flight, contact Airbus to obtain an approved Repair Design Approval Sheet, or Technical Adaptations, or Technical Disposition, and accomplish that repair accordingly, including post-repair follow-on action(s), as applicable.

Note: For the purpose of this AD, a discrepancy is a necessary design deviation due to production related concessions that directly affect the sensitive area of the modification.

Commenter 2: Lufthansa Technik AG – Thomas Frasch – 26/05/2015

Comment # 2

With regards to "Appendix 1":

the fact that "flap configuration 3" only matters when used during take-off (!) is mentioned in section "Reason" on the first page of the PAD; it might be helpful to clearly state that again in the "Replacement Compliance Time"- table in Appendix 1 of the AD.

EASA response: The AD will incorporate the following wording “Usage of flap configuration 3 setting during take-off” in table of the Appendix 1 of the AD.

Commenter 3: Shoaib Rehmatullah - Technical Services Engineer – Structures, Emirates – 08/06/2015

Comment # 3

- [A]** Does the Flight data set have to be from ‘aeroplane first flight’ within PAD Appendix Paragraphs 1 thru 4? If yes, then UAE might be forced to ground three MSNs (011, 013, & 016) to carry out the modifications. Also, UAE will be forced to have modifications performed on majority of the fleet at 2C Check due to high utilization rate
- [B]** Comment: UAE will not be able to comply with the following statement ‘Review of the aeroplane operational records is acceptable to make the determination of the flap configuration usage since aeroplane flight [...]’.

EASA response:

- [A]** No, the set of flight data does not have to include all flights since aeroplane first flight. Any sampling of 2000FC, 3000FC or 4000FC is acceptable to determine the flap configuration usage. The wording in the PAD (and then in the AD) mentioned in the Appendix 1 (see column condition “usage of flap configuration 3 during take-off”) reflects this: “less than 10% usage of configuration 3 setting for a cumulated period of [2000, 3000 or 4000 as applicable] Flight Cycles within [4000, 4371 or 4688 as applicable] Flight Cycles.
- [B]** EASA response: The sentence “Review of the aeroplane [...] can be relied upon that purpose” does not require the record review as this is not a requirement. It only provides an acceptable method to determine the flap configuration 3 setting usage at take-off based on the available operational records collected since aeroplane first flight.