


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 15-101</p> <p align="center">[Published on 28 July 2015 and officially closed for comments on 25 August 2015]</p>

Commenter 1: Air Transat A.T. inc. – Ianik Guy-Michaud – 30/07/2015

Comment # 1

The reason paragraph of PAD 15-101 refers to A330 ALI tasks 523211-02, which I cannot find. Could this be a typo error?

EASA response:

Comment understood. Airbus A330 ALI tasks 523211-02 was not yet published when EASA PAD 15-101 was published. Airbus confirms that it has in the meantime been published.

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

Commenter 2: American Airlines – Richard Castle – 05/08/2015

Comment # 2

American Airlines offers two comments regarding subject PAD:

1. After several months of attempting to source the ASNA2657K3-* fasteners called out in Service Bulletin (SB) A330-52-3095, American Airlines came across Technical Adaptation (TA) Ref.: 80016786/003/2014 (attached) which approves the use of alternate fasteners HST11*, HST111* and HST411* when accomplishing the SB, however nowhere in the SB are the alternates mentioned. American Airlines requests that the final AD approves the use of the alternate fasteners by either a) SB revision or b) acknowledgment of the TA in the AD text. We note that the TA also approves the alternate fasteners for accomplishment of SB A330-52-3087, however this SB calls out for EN6114K3-* fasteners rather than ASNA2657K3-* fasteners so some clarification is required on the relationship between the TA and SB A330-52-3087.
2. We believe Paragraph (3), Aft. Cargo Compartment Doors, of Required Action(s) and Compliance Time(s) contains a typographical error. Line 2 of the 2nd paragraph states “FWD cargo door” when we believe this should state “AFT cargo door”.

EASA response:

1. **Comment understood. Airbus confirmed that the next revisions of the applicable Airbus SBs should address the issues solved at the moment by some**

Airbus TA. No changes have been made in the Final AD in response to this point.

2. Comment agreed. That was a typographical error. “AFT cargo door” has been inserted in the Final AD in response to this point.

Commenter 3: Qantas – Ferdy Vidmar – 10/08/2015

Comment # 3

In respect of the subject PAD, the requirements concerning the condition for FWD/AFT cargo door installation, paragraphs (7) and (8) directly impacts activities that are part of normal maintenance and are considered superfluous. All ICA's contained in OEM approved documentation, such as AMM, SRM etc, that are impacted by the unsafe condition identified by the AD have been revised to address that unsafe condition. In this case, paragraphs (7) and (8) of the AD requires that whenever the doors are replaced, fasteners installed or forks replaced that the cargo hook gaps be adjusted per the SB's. If a cargo door is replaced for any reason other than the condition addressed by the SB's, then the normal procedure would be to reinstall per the AMM with cargo hooks adjusted per the AMM. If this occurs, then as the PAD reads now, the actions would be non-compliant with the AD. In summary, the following reasons outline the basis for stating that paragraphs (7) and (8) are superfluous:

1. For adjusting the cargo hook gaps of the doors following rework, the SB's clearly call up the AMM procedures (AMM Tasks 52-31-11-820-805 and 52-32-11-820-803) to accomplish the task.
2. Both Paragraphs (7) and (8) include the requirement to use the instructions in the SB's when doors are replaced. This will be impossible to control if the doors have been removed for reasons other than for accomplishment of repairs per the SB's.

EASA response:

Comment agreed. The necessity to have paragraphs (7) and (8) has be re-assessed, and, based on various arguments and in coordination with Airbus, it has been concluded that they can be removed.

Paragraphs (7) and (8) of the PAD have been deleted from the Final AD in response to this comment.

Commenter 4: Thomas Cook Group Airlines – Daryl Thomas – 12/08/2015

Comment # 4

With reference to PAD No.: 15-101 'A330 Inspection FWD Cargo Compartment Doors' paragraph (1) of the Required Action(s) and Compliance Time(s) states; “within the compliance time specified in Table 1 of this AD”, there doesn't appear to be a table 1 in the AD.

Can you please advise.

EASA response:

Comment agreed. A reference to ‘Appendix – Table 1’ was added in the Final AD in response to this comment.

Commenter 5: Delta Air Lines, Inc. – Darell T. Gingrich – 12/08/2015

Comment # 5

<p>Identifying the MOD status exemptions can only be verified for new a/c deliveries or when door can be traced back to a/c MSN it was originally delivered with. To support operators who cannot trace Cargo Doors back to original MSN or will borrow/lease/purchase doors, PreMOD 202702 MPN's and PreMOD 202790 MPN's are needed to meet required actions within noted Compliance times.</p>		Doors – Forward and Aft Cargo Compartment Doors – Inspection
	(s):	Airbus (formerly Airbus Industrie)
		<p>Airbus A330-201, A330-202, A330-203, A330-223, A330-223F, A330-243, A330-243F, A330-301, A330-302, A330-303, A330-321, A330-322, A330-323, A330-341, A330-342 and A330-343 aeroplanes, all manufacturer serial numbers (MSN), and</p> <p>Airbus A340-211, A340-212, A340-213, A340-311, A340-312, A340-313, A340-541, A340-542, A340-642 and A340-643 aeroplanes, all MSN,</p> <p>except those that have embodied Airbus modification (mod) 202702 and mod 202790 in production.</p>
		<p>Several cases of cracked forward (FWD) and aft (AFT) cargo door frames, as well as loose, lost, or sheared rivets, have been reported by operators. Investigation showed that these findings are due to the low margins with respect to fatigue requirements for the AFT/FWD cargo door internal structure. Further analysis determined that the cargo door hook adjustment is a contributing factor to this issue. In case of a cracked or ruptured (FWD or AFT) cargo door frame, the loads will be transferred to the remaining structural elements. However, the secondary load path is able to sustain those loads only for a limited number of flight cycles (FC).</p> <p>This condition, if not detected and corrected, could lead to rupture of adjacent</p>

AFT Cargo Compartment Doors:

- (3) Before exceeding 4 000 FC (for **pre-mod** – see **Note 1** of this AD) or 12 000 FC (for **post-mod** – see **Note 1** of this AD) since first installation of the AFT cargo door on an aeroplane, as applicable, or within the compliance time specified in Table 2 or Table 3 of this AD, as applicable, whichever occurs later, and, thereafter, at intervals not to exceed 550 FC, accomplish a DET inspection of all frame fork areas, frame head areas and outer skin area of the AFT cargo door, depending on inspection area, in accordance with the instructions of Airbus SB A330-52-3095 Revision 01, or SB A340-52-4101 Revision 01, or SB A340-52-5023 Revision 01, as applicable to aeroplane type and model.

Concurrent with the first inspection as required by this paragraph, accomplish a one-time inspection of the **FWD cargo door** hook gaps “U” and “V” and, depending on findings, adjust the hook(s) in accordance with the instructions of Airbus SB A330-52-3095 Revision 01, or SB A340-52-4101 Revision 01, or SB A340-52-5023 Revision 01, as applicable to aeroplane type and model.

Note 1: For the purpose of this AD, **pre-mod** A330 and A340-200/-300 aeroplanes are defined as not having Airbus mod 44852, or mod 44854 applied in production, or being in pre-SB A330-52-3044 or pre-SB A340-52-4054 configuration, as applicable. **Post-mod** A330 and A340-200/-300 aeroplanes are defined as having Airbus mod 44852 or mod 44854 applied in production, or modified in service through Airbus SB A330-52-3044, or SB A340-52-4054, as applicable.

(4) An inspection accomplished before the effective date of this AD in

To support operators who cannot trace Aft Cargo Doors back to original MSN or will borrow/lease/purchase spare doors, PreMOD 44852 MPN's and PreMOD 44854 MPN's of Aft Cargo Doors must be provided to determine the required compliance times

typo: should be AFT Cargo Door

EASA response:

Comments understood but not agreed. After some discussions with Airbus, it was concluded that the applicable Airbus SBs provide enough information to understand whether an aeroplane (and its cargo doors) is affected or not by this AD.

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

Commenter 6: Lufthansa Technik AG – Gregory Templeman – 24/08/2015**Comment # 6**

Lufthansa Technik wishes to submit the following comments in regards to PAD 15-101:

1. There appears to be a typing error in Para (4). Herein is a reference to Para (1) (Forward Cargo Doors) regarding an initial inspection. We believe the correct reference to be Para (3) (Aft Cargo Doors).
2. In para. 7 the following statement appears to be missing "...or following maintenance when all fasteners have been replaced,"... This statement is included in the provisions of Para 8 regarding the aft cargo door and we are unable to explain why this provision is not applicable for the forward cargo doors as well.

EASA response:

1. ***Comment agreed. See response to Point 2 of Comment #2. The Final AD has been amended in response to this point.***
2. ***Comment understood but it was decided to delete paragraphs (7) and (8). See answer to Comment #2. No changes have been made in the Final AD in response to this point.***