


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 15-108</p> <p>[Published on 19 August 2015 and officially closed for comments on 16 September 2015]</p>

Commenter 1: Airbus Transport International – Maurice Medeira – 31/08/2015

Comment # 1

For A300-600ST Beluga, the inspection of the center wing FR40 lower outboard radius is mandated through the DGAC AD 1998-038-010(B) R1 dated 24-Jan-2001. The subject PAD supersedes the DGAC AD 1998-038-010(B) R1. This DGAC AD should be listed in the box “supersedure” of the PAD.

EASA response:

Comment understood and agreed. The final AD will be updated accordingly.

Commenter 2: UPS – Mark Hilborn – 16/09/2015

Comment # 2

In reviewing the Proposal to issue an Airworthiness Directive (PAD) No. 15-108, dated August 19, 2015 and all associated data, the reference publications identify three (3) Airbus service bulletins that outline the inspection requirements for the center wing FR40 lower outboard radius inspection. Airbus has also released modification service bulletins for this area to improve the fatigue life of the center wing FR40 structural assembly. The modification actions are not identified in the proposed rule as an option for work that can be accomplished on the aircraft.

In the proposed rule, if a crack is found, corrective action must be taken prior to further flight (ruling paragraph (2)) and per ruling paragraph (4), the corrective action is identified as not terminating repeat inspections. If there are not cracks found, preventative work can be accomplished per Airbus SB A300-57-6116 which has a new inspection threshold and repeat inspection interval. However, this option is not addressed in the proposed rule as paragraph (2) is only applicable for aircraft with findings. Accomplishment of SB A300-57-6116 requires no cracking as a condition.

My request is to address the existence of these modification service bulletins (i.e. A300-57-6116 for A300-600) in the proposed rule and to define the post-modification inspection requirements as defined in the respective inspection service bulletins. This addition to the proposed rule will avoid issuance of alternate means of compliance approvals subsequent to the final rule release.

As a minor point of interest, the e-mail address for Airbus – Continued Airworthiness is listed as no longer valid. Please review and update as applicable.

EASA response:

Comment noted. The paragraph (4) of the final AD was reworded to take into account the possible optional modification. This MOD (SB A300-57-0260, or A300-57-6116, or A300-57-9033) is recommended and is not a terminating action to the inspection requirements.

The e-mail address for Airbus – Continued Airworthiness is still valid. No change in the AD.