



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-044

[Published on 21 March 2016 and officially closed for comments on 18 April 2016]

Commenter 1: HI FLY – Rui Cavaco – 15/04/2016

Comment # 1

AIRBUS recorded A330 MSN 1004 and A340 MSN 1030 as the lowest aircraft MSN affected by the unsafe condition. Source: applicability of subject SBs.

We understand the aim of the PAD Note 2 and agree with it, in theory, for any given unsafe condition. However, it is highly possible that the subject inboard flaps identified in PAD Appendix 1 cannot be installed on MSN lower than the values noted above due to IPC spare usage restrictions.

Therefore, we are in favor that the future AD may have its applicability aligned/restricted to the MSN where the components can, de facto, be installed as spare parts.

EASA response:

Comment not agreed. We understand the argument related to the Airbus IPC that would not allow installation of an affected part on an aeroplane as specified in the comment. However, inboard flaps are clearly 'rotatable' parts, besides which it must be considered that an IPC is not an EASA approved document, there is no regulation in place to require its use (i.e. make it enforceable), and therefore it cannot be excluded that an operator could have ignored some IPC instructions. Anyway, for an aeroplane that the commenter considers 'not affected', the only action is to identify whether an affected part is installed on the aeroplane. This is a very simple action. If it is confirmed that no affected part is installed, no further action is necessary.

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

