COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-110

[Published on 21 July 2016 and officially closed for comments on 18 August 2016]

Commenter 1: Cathay Pacific Airways Limited – Hyphen Choi – 04/08/2016

Comment # 1

CPA / AHK have reviewed the PAD 16-110 and would like to make some comments for your review.

1. PAD para 7 is not the "re-statement of the requirements of AD 2015-0150", please put it at the "new requirements of this AD" session.

2. PAD 16-110 is adding new requirements to AD 2015-0150, which is the terminating mod SB A300-53-6181. However we have confusion on the effective a/c.

- AD 2015-0150: only MSN 683 & 770 are applicable
- PAD 16-110: all MSN's are applicable (MSN 855, 856, 857, 858, 859, 860, 870, 871, 683, 770)
- SB A300-53-6181 Rev 01: only MSN 683 & 770 are applicable

a/c	MSN	Mod 05438	Mod 12046	AD 2015-0150 Applicable	SB-A300-53-6181 Rev 01 Applicable	PAD 16-110 Applicable
B-LDA	855	Done	Done	No	No	Yes
B-LDB	856	Done	Done	No	No	Yes
B-LDC	857	Done	Done	No	No	Yes
B-LDD	858	Done	Done	No	No	Yes
B-LDE	859	Done	Done	No	No	Yes
B-LDF	860	Done	Done	No	No	Yes
B-LDG	870	Done	Done	No	No	Yes
B-LDH	871	Done	Done	No	No	Yes
B-LDM	683	Done	Not done	Yes	Yes	Yes
B-LDN	770	Done	Not done	Yes	Yes	Yes

We believe only MSN 683 & 770 are applicable to the PAD, please clarify.

3. Based on AD 2016-0150 compliance time, MSN 683 & 770 (LDM & LDN) have scheduled to carry out SB-A300-53-6179 inspection before Dec 2016. However, as per PAD Table 4, they will need to carry out the SB A300-53-6181 modification within 12 months after the effective date of the AD, which cannot meet the next BM check.

Table 4 – Reinforcement / Modification

	Compliance Time (whichever occurs later **A**, **B**, or **C**)
A	Before exceeding 19 600 FC since aeroplane first flight
B	Within 2 300 FC after the last HFEC or DET Inspection in acordance with Airbus SB A300-53-6179 or A310-53-2139
C	Within 12 months after the effective date of this AD

a/c	MSN	TFH as of 4 Aug 2016	TFC as of 4 Aug 2016
B-LDA	855	17390:44	6978
B-LDB	856	17403:16	6972
B-LDC	857	17022:18	6844
B-LDD	858	17057:35	6875
B-LDE	859	16531:51	6661
B-LDF	860	16560:16	6557
B-LDG	870	14826:34	5919
B-LDH	871	14676:38	5889
B-LDM	683	40501:37	28312
B-LDN	770	34835:57	26390

Please consider to amend the Table 4 Compliance Time C to be “Within 24 months after the effective date of this AD”.

4. The PAD proposes the effective date is 14 days after the AD issue date, please consider to extend it to 30 days giving us enough time to setup the documentations, settle the planning and inventory actions.

EASA response:

1- Comment partially agreed: EASA added another subtitle to that particular paragraph (7) to define properly the action: “Terminating Action”.

2- Comment not agreed: In fact PAD 16-110 effectivity should be the same as AD 2015-0150, that is to say :
Airbus A300-600 and A310 aeroplanes, all certified models, all manufacturer serial numbers on which Airbus modification (mod) 05438 has been embodied in production, except aeroplanes on which Airbus mod 12046 has also been embodied in production.
Therefore in the listed A/C MSN´s mentioned above, only AHK MSN´s 0683 0770 are impacted by the forthcoming AD.

3- Comment not agreed: Compliance times were defined in the frame of widespread fatigue damage (WFD) compliance study and no further increase of the compliance time can be justified. Item C is kept as proposed in PAD 16-110 but was effectively prolonged by the delay of AD publication already.

Table 4 Reinforcement / Modification will be update as following:

Table 4 – Reinforcement / Modification **Compliance Time** (whichever occurs later **A**, **B**, or **C**)
A Before exceeding 19 600 FC since aeroplane first flight
B Within 2 300 FC after the last HFEC or DET **accomplished after the effective date of this AD**
C Within 12 months after the effective date of this AD

4- Comment not agreed: The date of effectivity must not be considered as a grace period but is a pure administrative allowance. The required actions must be performed within the compliance times.

Commenter 2: FedEx Express – Bob Miskimen – 09/08/2016

Comment # 2

1. The proposed Airworthiness Directive (AD) will be effective for (69) A300-600 model airplanes and seven (7) A310-300 model airplanes operated by Fed Ex Express.

2. FedEx acknowledges that we have previously accomplished this inspection on all aircraft which were active in our fleet as of September 2015 as required by the Airbus AOT A53W00514 dated 22 April 2014 (Threshold). We reported to Airbus that no aircraft with findings as a result of this complex inspection.

3. We have 35 Aircraft which have exceeded the Threshold of 18,000 FC at the time of the Airbus AOT A53W00514 dated 22 April 2014 issuance, and none of these were discovered with any discrepancy.

4. FedEx acknowledges that we will be required to modify the frames in the inspection area as a Terminating Modification to repetitive 275 FC inspections after exceeding 19,600 FC or within 2,300 FC from the last DET inspection.

5. FedEx requests that EASA reconsider the repetitive inspection requirements, as we find it pointless to repair items which do not exhibit the findings expected. Obviously, by the absence of finding in the area of the Airbus AOT A53W00514 dated 22 April 2014 inspections, we find that level of safety can be maintained by repetitive inspection and that expensive modifications as proposed by SB A300-53-6181 and SB A310-53-2141 can be avoided. FedEx Cargo operations do not have an equivalent load which would cause cracking in this area.

6. FedEx do not believe that modification per SB A300-53-6181 & SB A310-53-2141 are necessary and should be incorporated only on an attrition basis, upon the results of findings in the inspection area.

EASA response:

Comment not agreed: Modification per SB A300-53-6181 & SB A310-53-2141 are necessary and mandatory by the fact that these modifications were defined in the frame of widespread fatigue damage (WFD) compliance study.

Commenter 3: European Air Transport Leipzig GmbH – Harald Paul – 15/08/2016

Comment # 3

The German operator European Air Transport Leipzig GmbH (BCS) operates 20 A300B4-622R and one A300F4-622R aircraft. BCS has also engineering responsibility of four A300B4-622R for Irish operator ASL Airlines Ireland.

BCS understands the urgency of this PAD and the necessity of mandating existing requirements as per Airbus Service Bulletin (SB) A300-53-6181 Rev. 01 dated 26 June 2015. For this reason, BCS has followed the philosophy of incorporating Airbus SB A300-53-6181 Rev. 01 and Airbus AOT A53W005-14 original issue dated 22 April 2014, or Revision 01 dated 29 April 2014, at the earliest possible opportunity, even before EASA AD 2015-0150, dated 23 July 2015, had been released. During embodiment of mandatory Airbus SB A300-53-6181 Rev. 01, BCS has experienced significant quality issues for Config. 02 aircraft. Several modification parts contained in the modification kit 536181D02R00 cannot be installed:

- Length of several provided new lock fittings are incorrect
- Provided shims are straight instead of tapered
- Guidance for the alignment of new lock fitting not available
- Insufficient edge margins on several kit parts

In summary, BCS is facing the situation that the modification had to be aborted. The aircraft could only be brought to a temporarily acceptable condition. The configuration is currently covered by a temporary TA issued by Airbus. BCS will face additional costs both due to the current efforts by our MRO to communicate with Airbus and to agree on a temporary solution and by the efforts to convert that temporary solution into a permanent solution.

All of the above can be attributed to insufficient quality of the modification SB, as well as the fact that the more complex Config. 02 modification was never physically validated on an aircraft considering alignment of the lock fittings and rigging of the cargo door. Alignment instructions for the new lock fittings of the non-plug type AFT lower cargo door are not included in the Airbus SB A300-53-6181 Rev. 01.

As a consequence, BCS has stopped the embodiment of Airbus SB A300-53-6181 Rev. 01 Config. 02 on any further aircraft.

For Airbus SB A300-53-6181 Rev. 01 Config. 01 airplanes deviations during embodiment have been covered by Airbus RDAS due to insufficient edge margins. This also shows the insufficient quality of the Airbus SB A300-53-6181 Rev. 01 modification kits.

Mandating the Airbus SB A300-53-6181 Rev. 01 without prior revision by Airbus could result in further discrepancies to be accepted and potentially in misaligned lock fittings for the AFT lower cargo door, therefore resulting in a safety risk.

BCS would like to urge EASA to postpone the release of this proposed AD until quality issues in the SB and the kits have been resolved.

EASA response:

Comment partially agreed: Airbus is aware of the BCS problem to embodied MSB A300-53-6181 and has provided clarifications:

- The fact that length of several provided new lock fittings are incorrect was identified as isolated cases and addressed through TA referenced 80109685/035/2016

- The need for guidance for the alignment of the new lock fitting and insufficient edge margins on several kit parts will be corrected in the next SB 53-6181 revision which is planned to be issued within 6 month.

In the meantime, before the next revision of the SB becomes available, individual approved technical adaptations (TA documents) or AMOCs may become necessary upon on a case by case basis and the late availability of a revision to the SB does not warrant further delay in the publication of the AD.