



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-117

[Published on 02 August 2016 and officially closed for comments on 30 August 2016]

**Commenter 1: Lufthansa Technik – John Donegan – 17/08/2016**

### Comment # 1

1. The PAD states both “latest SRM issue” and “current SRM revision”. LHT requests that an explicit revision is given and that it is not left to the revision at the time of the effective date of the AD. Operators may have already performed the analysis in accordance with the SRM issued at the date of SB original issue. This should be considered sufficient to comply with the airworthiness concerns. Please add the SRM revision at the time to applicable “correct” SRM limits were introduced.

2. LHT issued a query to Airbus in September 2015 specifically regarding SB A310-57-2102 at which time a number of discrepancies or unclear information were identified (Airbus Ref. 80067557):

- Figures A-USCAA and A-UBBAC do not show the correct inspection area and should be updated to avoid incorrect performance.
- It should be clear that only repairs resulting in loss of cross-sectional area are affected (not reinforcing repairs in the associated SRM chapters).
- The inspection requires to ensure that existing blend-out repairs are within “current” SRM limits. Cases where SRM limits have been exceeded but covered by RDAS are not explicitly excluded from the AD. This should be made clear in the AD, that repairs do not necessarily have to be within current SRM limits if otherwise approved by RDAS.

### EASA response:

1. The wording in the PAD is similar to that given in the SBs; “Operators will be required to check the areas identified in this Service Bulletin and compare against the current SRM issue (including temporary revisions) to determine if the new requirements are met”. At the time of SB issuance (August 2015), the SRMs were in between revisions and hence some of the SRM updates were accomplished by issuance of “Temporary revisions”. At the time of PAD issuance the temporary revisions have since been included within the current SRMs. Since SB issuance no further restrictions have been included within the SRMs further to the TRs applicable at the time of SB issuance.
2. Figures A-USCAA and A-UBBAC within SB 57-2102 are consistent with the A310 SRM. Although the figures show wing top skin panels 1 and 2, the accomplishment instructions require only to inspect (records or aircraft) panel 1. The instructions are considered to be clear and the inclusion of panel 2



annotations within the SB figures does not prevent the SB from being accomplished. Should an area inspected through SB 57-2102 have a pre-existing repair that is justified by Airbus RDAS, no further action is required by the operator. However, operators may still wish to contact Airbus in such cases. If an aircraft listed in the effectivity has a modification or repair embodied that is not of AIRBUS origin, and which affects the content of this Service Bulletin, the operator is responsible for obtaining approval by its airworthiness authority for any adaptation necessary before incorporation of the Service Bulletin.

***No changes to EASA AD following these question.***

***Commenter 2: Cathay Pacific Airways – Miikka Antila – 19/08/2016***

***Comment # 2***

1. Paragraph 1 provides a compliance time 36 months and SB allows 4 years from the SB issuance date. Operator would much appreciate to line up this inspection to heavy check where is more ground time available rather than single c-check. CPA/Air Hong Kong is going to accomplish physical check rather than maintenance record review so aircraft must be available (grounded) for the check.
2. For the effective date, operator would prefer to have minimum 30 days after the AD issuance to allow reasonable reaction time to set up all necessary compliance documents.

***EASA response:***

1. Airbus took into account the possible need for a physical check on-aircraft when recommending the compliance time of 4 years. However the compliance time for mandatory action is defined by EASA, who, considering that the SBs have already been available for more than one year, has chosen a mandatory compliance time of 36 months since AD issuance.
2. 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.

***No changes to EASA AD following these question.***

