



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-158

[Published on 10 November 2016 and officially closed for comments on 08 December 2016]

Commenter 1: United Airlines – Richard R. Foster – 18/11/2016

Comment # 1

United Airlines has no objection to PAD number 16-158.

EASA response:

Comment noted and appreciated. No changes have been made to the Final AD in response to this comment.

Commenter 2: American Airlines – Ken Ying – 23/11/2016

Comment # 2

The following statement on page 2 of 3 of PAD 16-158 is misleading and directly conflicts with the compliance section of Table 2 – HP Fuel Tubes/ Flanged Adaptors Replacement.

“For the reasons described above, this AD retains the requirements of EASA AD 2014-0123, which is superseded, and in addition requires the installation of new HP fuel pump-to-FFG fuel supply and inlet overspill tube assemblies. This AD also prohibits future (re-)installation of earlier HP fuel pump to-FFG fuel supply and inlet overspill tube assemblies.”

Therefore AAL recommends that the statement reads as follows to avoid confusion with table 2, and to be clear that the HP Fuel Tubes does not require replacement due to an on-wing FFG replacement:

“For the reasons described above, this AD retains the requirements of EASA AD 2014-0123, which is superseded, and in addition requires the installation of new HP fuel pump-to-FFG fuel supply and inlet overspill tube assemblies. This AD also prohibits future (re-)installation of earlier HP fuel pump to-FFG fuel supply and inlet overspill tube assemblies, only when the part requires removal because of its condition or during accomplishment of the instructions of RR SB RB.211.73-E355.”



EASA response:

Comment understood, but not agreed. It should be clear that the 'Reason' Section of an EASA AD is used to describe the unsafe condition and its possible consequences if no corrective action is taken, thereby justifying the AD action. The final paragraph of that Section then provides a 'summary' of what actions are required, without (the need for) details, or to specify when. The detailed actions and when to accomplish them are specified in the 'Required Action(s) and Compliance Time(s)' Section. Based on that standard, which has been in place for many years, EASA disagrees that this can be considered a 'contradiction' and we have no indication that this could lead to confusion. Regarding the commenter's question on whether the HP Fuel Tubes requires replacement, due to an on-wing FFG replacement, the AD only requires that action when the condition of the tube(s) indicates the need for replacement. Re-installation of the same tube on the same engine is therefore allowed, provided the condition of the part justifies that action.

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

