



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-164

[Published on 29 November 2016 and officially closed for comments on 27 December 2016]

Commenter 1: Hifly – Rui Cavaco – 02/12/2016

Comment # 1

AIRBUS SBIT 16-0045 Rev 00 advises A330/A340 operators that SBs A330-57-3123 R00 and A330-57-4130 R00, dated 14 Jun 2016, contain some errors that must be corrected by SBs revision R01. With this in mind, HFY suggests to include SBIT 16-0045 Rev 00 to the Ref. Publications section for clarity. This suggestions is only valid if SBs at R00 are indeed rendered mandatory in the final AD.

EASA response:

Comment agreed. EASA PAD 16-164R1 has been published and includes a reference to Airbus SBIT 16-0045.

Commenter 2: Saudi Arabian Airlines – Faisal Basheikh – 15/12/2016

Comment # 2

During studying of PAD 16-164, SVA is confused to confirm, if it is applicable on our A330 fleet or not. Therefore, we contacted Airbus for further information/assist in this regard and they confirmed that all slat tracks post MOD 45967 are not affected per this PAD. Thus, please confirm that PAD 16-164 is applicable on all A330-343 airplanes, all manufacturer serial numbers (MSN) up to MSN 1570 inclusive except on which Airbus mod 45967 has been embodied in production.

EASA response:

Comment not agreed. It has been determined that some aeroplanes delivered with slat tracks post Mod 45967 (Group 2 aeroplanes) could be also equipped with slat tracks pre Mod 45967 (Group 1 aeroplanes). Unfortunately, embodiment of Mod 45967 in production is not the excluding factor regarding AD applicability, the criteria is the P/N installation on wing according to appendix 1 of the PAD. However, for an aeroplane identified within Group 2 and remaining in that configuration, this aeroplane is not affected by the inspection requirement of this AD. This aeroplane is only



affected by paragraph (10) to avoid that an affected slat track is installed, thereby expanding the number of aircraft subject to repetitive inspections, which EASA has determined as unacceptable.

No changes have been made to EASA PAD 16-164R1 in response to this comment.

Commenter 3: Cathay Pacific Airways Limited – Miikka Antila – 17/12/2016

Comment # 3

- A. AD should become effective as a standard 30 days after the issue date.
- B. Paragraph 7 as reserved, Cathay Pacific would like to know which kind of requirement will be added on this.
- C. Paragraph 8 should be deleted as reporting nil findings is not a safety related issue. It is only convenience and to collect data for statistics. This is driving airline and MRO organization to difficult situation as a mechanic who works on the aircraft normally hasn't got "reporting tools" on the hangar. But Engineering must add a work step for this reporting requirement on the work card. There should be another communication channel for non-safety related issues.
- D. Paragraph 9: To stop installing a slat track like this way puts airline engineering to work an extra mile as same P/N can be either pre or post condition. Better way it to change the P/N after the inspection and then control this installation per IPC.
- E. Paragraph: This scenario of installing an affected slat track should be allowed within AD compliance threshold time frame and not from the AD effective date. This is more restricted requirement.

EASA response:

- A. Comment not agreed. The extension of the period between issue date and effective date is only granted by EASA on an exceptional basis, e.g. complicated cases like several SBs to be accomplished on the same aeroplane. In this specific case, only one SB, or maximum two, is to be accomplished. No changes have been made to EASA PAD 16-164R1 in response to this comment.***
- B. Comment understood. Paragraph (7) has been reserved for possibly introducing a terminating action, if this becomes available, in which case the AD will be revised if the terminating action is only optional. No changes have been made to EASA PAD 16-164R1 in response to this comment***
- C. Comment understood but not agreed. In this specific case, the reporting is necessary as the slat track cracking mode is not yet well understood. When enough data is collected, this AD might be revised to delete this requirement. No changes have been made to EASA PAD 16-164R1 in response to this comment.***



- D. Comment not agreed. A pre-mod slat track does not have the same P/N as a post-mod slat track. For this specific case, there is no change in P/N post-inspection, as there is no final fix defined for pre-mod parts. In addition, the Airbus IPC is not a direct EASA approved document and cannot be used for aircraft modification action(s). European regulation does not allow modification of an aircraft (e.g. installation of a pre-mod slat track, modifying a Group 2 aircraft) by only using the IPC, which does not contain such instructions and is not intended for that purpose. No changes have been made in EASA PAD 16-164R1 in response to this comment.**
- E. Comment partially agreed. For Group 2 aeroplanes, see EASA answer to Comment #2. For Group 1 aeroplanes, installation of an affected slat track is allowed, provided Airbus is contacted and confirm it can be accomplished. EASA PAD 16-164R1 has been amended in response to this comment.**

Commenter 4: Lufthansa Technik AG – John Donegan & Sarah Bender – 22/12/2016

Comment # 4

Please note following LHT comments on the PAD:

- A. The applicable SBs give an effectivity up to MSN 0340. The PAD, however, includes an effectivity of the relevant models up to MSN 1570. LHT presumes this is due to the fact that the same part number can be installed by IPC on those aircraft up to MSN 1570 (inclusive) after entry into service. Can you kindly confirm that IPC has never permitted installation of the PN listed in Appendix 1 of 16-164 on aircraft above 1570 aircraft, i.e. a non-interchangeable PN is given for those aircraft.
- B. §2 of the PAD states “...during any SDI as required by paragraph (1)...”. LHT suggests this should state: “...during any inspection as required by paragraph (1)...” in order to include any findings from the DET. Cracks may also be found from the DET which could/should also lead to the interval reduction as applicable. Kindly advise.
- C. §6 of the PAD states that the corrective action detailed in §4 is not a terminating action. Please advise in case the corrective action is performed in accordance with §3 or §5. LHT assumes those instructions (or repair) supersede the AD inspections, e.g. a RDAS will define any applicable ICAs and the AD is terminated at that location. In case the AD inspections must continue, please advise how to handle potential inconsistencies with a RDAS re-inspection.
- D. LHT concurs that the reporting per §8 is highly beneficial for Airbus to monitor the scale of findings. However, LHT disagrees that this should be an AD requirement – there is no airworthiness concern for the aircraft if those inspections results are reported after the 30 day limit. Indeed, many base maintenance layovers may take longer than 30 days to perform, so that the inspections findings are not available to the operator within this timeframe. Additionally, the EASA CAMO has 30 days to review maintenance records following the publication of CRS. If EASA/Airbus are concerned



that they need to be informed if there are serious problems on the fleet in this regard, all of those findings will be adequately reported to Airbus through your existing requirement §3 and §5 to contact Airbus for findings exceeding SB ADLs. Again, we fully understand the advantage for Airbus to mandate reporting within a specified timeframe, but we do accept to have to ground an aircraft, if a reporting is not sent to Airbus within that limit.

- E. §9 allows installation on Group 1 if approved by Airbus. §10 does not allow installation on any Group 2 aircraft. LHT assumes this PN is not published in the IPC for any aircraft up to and including MSN 1570. Please confirm.
- F. If a Group 1 aircraft can have these parts installed either since before effective date of the AD or through an instruction covered by §9, there should be no airworthiness constraint to install these PN on a Group 2 aircraft, as long as the inspection programme per AD is initiated for the affected slat track. Why would it be unsafe to install on a Group 2 but acceptable to have it on a Group 1 aircraft. The AD just need to become effective for any aircraft with the PN installed at any date. This demand can create unnecessary economic burden on operators with spare parts. If the operator can ensure the inspections will be done on the slat track, this should surely be adequate to ensure the continued airworthiness of the aircraft. If it is not adequate, then we have a problem with the Group 1 a/c too.
- G. SBIT OIT 16-0045 was issued by Airbus on 10 August 2016 due to incorrect washer PN. LHT requests that this information is included in the final AD and to address aircraft already implementing this SB at Rev. 0 with this error.
- H. The SBs state that a maximum of five slat tracks may have damage up to ADL limits per aircraft. More than five is not permitted. LHT assumes this requirement is not part of the final AD as it is not mentioned in the PAD. Please advise.
- I. The accomplishment compliance time has the same flight cycle for A330 and A340 and higher FH value for A340. The interval, however, completely diverges from this value to a greatly reduced FC value compared to A330 and even less FH value. It seems crack growth is anticipated to be much higher on A340 than A330 due to lower intervals, but however, initiation is later. Does it make sense for the same PN? Kindly advise.
- J. The final AD should have a 30 day period between issue date and effective date, when no immediate short-term airworthiness concern exists. LHT acknowledges that the effective date affects the compliance of the grace period. However, the grace period approved by the Airbus design office has been published several months ago and will obviously have to take into account forecasted AD publication date which should have a conservative approach to easily permit the extension from current 14 days to 30 days. The 30 day extension is to permit adequate time within the operator for correct processing of the document within a reasonable time, in cases where there is no immediate airworthiness concern. . If these two weeks extension from 14 to 30 days are denied by EASA as it is deemed to critical, then LHT would have to question why it can be acceptable to wait so long to delay AD publication from 14 June 2016 (SB publication date from Airbus) to final AD publication (expected January 2017). If a 7-month period before becoming mandatory is acceptable, an extension from 14 to 30 days should be agreed by EASA, unless immediate action is required.

EASA response:



- A. Comment understood. See also EASA answer to Comment #3, point D. Unfortunately the current IPC, even for aeroplanes MSN 1570 and above, still contain for several tracks the P/N of affected slat tracks as approved spare parts. It is expected that the IPC will be revised, making the affected slat tracks no longer eligible for installation on post Mod 45967 aeroplanes. Interchangeability is not excluded currently, therefore the AD applicability was extended in PAD 16-164R1.**
- B. Comment not agreed. Further to clarifications from Airbus, only the SDI enables detection of a crack. No changes have been made to EASA PAD 16-164R1 in response to this comment.**
- C. Comment agreed. It is possible that Airbus provide specific inspections for reworked aeroplanes. Paragraph (6) of the PAD 16-164R1 has been amended to specify that.**
- D. Comment not agreed. See EASA answer to Comment #3, point C. No changes have been made to PAD 16-164R1 in response to this comment.**
- E. Comment understood. By IPC, installation of an affected slat track is eligible for MSN 1570 and above. See also EASA answers to Comment #3, points A and D.**
- F. Comment not agreed. There are no Airbus instructions to install an affected pre-mod slat track on a post-mod aeroplane (MSN 1570 and above). For Group 2 aeroplanes, see EASA answer to Comment #2. See also EASA answer to Comment #3, point D.**
- G. Comment agreed. See EASA answer to Comment #1.**
- H. Comment agreed. Clarifications have been introduced. EASA PAD 16-164R1 has been amended in response to this comment.**
- I. Comment understood. The figures as given are the result of investigation and calculation. They have been agreed between Airbus and EASA experts taking into account different utilisation and loading. No changes have been made to EASA PAD 16-164R1 in response to this comment.**
- J. Comment not agreed. See EASA answer to Comment #3, point A. No changes have been made to EASA PAD 16-164R1 in response to this comment.**

