



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-164R1

[Published on 07 March 2017 and officially closed for comments on 21 March 2017]

EASA comment on difference between EASA PAD 16-164R1 and the Final AD: It was determined that for Airbus A340-500/-600 aeroplanes, the threshold for the required inspection is beyond the Design Service Goal applicable to these aeroplanes. For that reason, these aeroplanes have been removed from AD Applicability.

Commenter 1: Lufthansa Technik - John Donegan – 08/03/2017

Comment # 1

A. We would like to reiterate our concerns over the insistence of mandating reporting (including nil-findings) within 30 days. We have to disagree that the issue of findings reporting is related to the airworthiness of that aircraft within 30 days. The implication is made that if no reporting is received by Airbus within 30 days, the aircraft is unsafe.

If the topic is “not well understood” on Airbus side, we suggest that operators are not the ones penalized by threatening non-compliance with an AD and potential grounding of an aircraft. As Airbus insists that it closely monitors the FC/FH of the world fleet, we suggest it much more appropriate for Airbus to approach the affected operators individually for further information, once those aircraft are in the compliance limit region and request inspection results. In further cases, to rely on the standard reporting sheets attached to the SB. This is a much more measured way forward, which does not have any legal consequences for an operator. Indeed, as per the AD “Reason”, several operators already have reported cracks. If the situation is deemed so serious, we have to beg the question as to why the affected PN remains in the IPC when this document has been revised at least three times (!) since this subject was first announced by Airbus as being an airworthiness concern, even for aircraft which were delivered subsequent to SB publication! Airbus continued (and continues!) to permit installation of those parts.

B. AD Action #10 proposes that the PN cannot be installed on any Group 2 aircraft after the effective date of the AD. However, EASA and Airbus confirm that the A330 and A340 IPCs fully permit installation of pre mod 45967 parts on those aircraft. This is a direct contradiction and highly impractical. Mechanics operate according to OEM manuals which are customized by Airbus for operators’ use. If the Airbus IPC permits installation, it will be done. This concern needs to be addressed by swift removal of the PN from the IPC after which AD Action 10 is redundant. The IPC remains valid maintenance data. A Temporary Revision of the IPC must be set up as the only way to supersede the current valid IPC.



- C. The MSN effectivity count affected by the AD should be capped to aircraft delivered prior to next IPC revision, once this oversight is finally corrected, if indeed the PN will actually be removed, should there be any burden on Airbus' side.
- D. We strongly request a grace period of 30 months (not 24 months). Standard C-Check interval is 24 months, time must be allowed for planning when it is not feasible to introduce new inspection requirements at such short notice if an aircraft is already in maintenance condition at the time of AD publication. It cannot be argued that the situation is already known to operators through the SB, as the AD now aims to hugely increase the effectivity above those listed in the SBs. Those inspections are not currently planned for aircraft beyond the SB effectivity and many will have already exceeded the compliance limit.

EASA response:

- A. Comments partially agreed. It remains essential to receive feedback from operators in order to better understand the extent of the problem. EASA will consider cancelling this reporting requirement, when that understanding has been attained, e.g. by revising the Final AD. The Final AD has been amended by allowing 60 days after an inspection for reporting the results.**
- B. Comment partially agreed. EASA are aware that the IPC indicates that pre-Mod 45967 parts are eligible for installation on a Group 2 (i.e. post-mod) aeroplane. However, it should be clear that the IPC is a 'catalogue' only, and does not – in itself – constitute an aircraft modification approval. Nevertheless, Airbus is committed to shortly publish an IPC correction to make clear that those pre-mod parts are actually not eligible for installation on post-mod aeroplanes. Considering that aeroplanes can also be modified without taking the IPC into account (e.g. STC), EASA considers it safer to explicitly prohibit such actions. No changes have been made to the Final AD in response to this comment.**
- C. Comment not agreed. See EASA answer to Point B above. No changes have been made to the Final AD in response to this comment.**
- D. Comment not agreed. The initial action, to identify whether post-mod aeroplanes (i.e. those outside SB Effectivity) have (inadvertently) one or more pre-mod slat tracks installed, is fairly straightforward and should not impose an undue burden, also considering the fact that it is unlikely to have been done and, if so, only on few aeroplanes. It should be clear that, for a post-mod aeroplane that is confirmed to remain post-mod (i.e. Group 2), only paragraph (10) of the Final AD applies. No changes have been made to the Final AD in response to this comment.**

Commenter 2: Cathay Pacific – Jimmy Cheng – 20/03/2017

Comment # 2

- A. AD should become effective as a standard of 30 Days accounting from the issue date in lieu of 14 Days to provide sufficient time for operators to take appropriate action. Despite the response from the CRD, if the days provided are depended on the number of SBs mandated by the AD, then



what is the standard to define this ie. How many days will be added based on how many SBs. Based on the current definition, it would seem that operators with more SBs/Airbus aircrafts applicable are more penalized by the system because of the insufficient time for processing.

- B. CPA would like to know if the “Terminating Action” will be included in Paragraph 7 as mentioned from the CRD when the actual AD will be released.
- C. CPA would like EASA to clarify in what way does Reporting Nil Findings per Paragraph 8 will have effect on the airworthiness of the aircrafts? If not, why should this Airworthiness Directive include this requirements?

EASA response:

- A. Comment not agreed. This comment addresses an EASA AD publication policy subject, unrelated to this individual PAD. The time since Airbus SB publication, and since EASA PAD publication, have provided operators with sufficient time to review, assess and plan the necessary action(s). It should also be noted that the AD allows considerable ‘compliance time’, part of which – assuming no AOG is threatened to occur – can also be used for scheduling the necessary action(s). No changes have been made to the Final AD in response to this comment.**
- B. Comment understood. The Final AD does not contain a terminating action for affected pre-Mod 45967 (or partially pre-mod) aeroplanes. This could be the subject of an AD revision, if and when this becomes available. No changes have been made to the Final AD in response to this comment.**
- C. See EASA answer to Comment #1, Point A.**

