



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-171

[Published on 14 December 2016 and officially closed for comments on 11 January 2017]

Commenter 1: British Airways – Philip Bourke – 19/12/2016

Comment # 1

The PAD states:

Applicability:

Airbus A380-841, A380-842 and A380-861 aeroplanes, all manufacturer serial numbers.

While the SB applicability is limited to certain MSN's.

Please ensure the AD and SB applicability are the same.

EASA response:

Comment agreed. The Final AD has been amended accordingly

Commenter 2: Air France – Gwenael Gueraud – 19/12/2016 and 21/12/2016

Comment # 2

The para of PAD covers the SB 53-8128 as follow:

Para (2.1) & (4), cover "if crack is found and cut-out necessary to remove cracks is equal to or lower than the cut-out defined" without deviation from drawings.

Para (2.2) & (3), cover "if crack is found and the frame replaced".

But, any para's of the PAD 16-171 didn't speak about "if crack is found and cut-out necessary to remove cracks is greater than the cut-out defined" > Contact AIB (understood WITH deviation from drawings).

Could you confirm that and correct/add information if necessary? Or explain my misunderstanding?

Comment # 3

PAD 16-171 doesn't speak about any repairs applied before the AD.



For example, AFR has applied a repair cover by TD/80222120/009/2016#A (FR69 STGR 2 RH) and RDAS 80222120/003/2016 issue A Cat.A on MSN 00049.
Could you bring out in the future AD document any TD's, which constitute terminating action?

EASA response:

Comment # 2

The AD gives global directives to apply in accordance with the detailed instructions of SB A380-53-8128. Para (2.1) & (4), cover all the repairs (directly if cut-out necessary to remove cracks is equal to or lower than the cut-out defined, or after Airbus instruction if cut-out is greater), and Para (4) specifies that the repair is a terminative action if it is made without deviation from drawings.

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

Comment # 3

Comment not agreed. The AD covers the core elements and not all the potential anticipated exceptions, existing or not. Exceptions or alternative means to comply with the AD shall be handled by using AMOC or flexibility provisions of Article 14)4) of the Regulation No 216/2008 of the European Parliament and of the Council.

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

