



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-010

[Published on 20 January 2017 and officially closed for comments on 17 February 2017]

Commenter 1: Swiss International Air Lines – Stefan Marc Hilber – 23/01/2017

Comment # 1

Ref.:

/A/ PAD 17-010

/B/ SB A330-27-3218

/C/ SB A340-27-4203

/D/ SB A340-27-5067

Referring to PAD ref. /A/ Note 3:

Swiss Intl. Air Lines is of the opinion that it might be difficult for operators to verify if a replacement THSA is serviceable.

When it's status is not "New" or "Overhauled" and the release certificate or shop documents give no statement about last performance of SBs ref. /B/, /C/ or /D/, a THSA must be considered as not serviceable.

For the reasons stated above we would propose the following:

1. Component-related inspection content ref. SBs /B/, /C/ or /D/ should be included in relevant Goodrich/UTAS CMMs and to be performed at every shop visit.

and/or

2. THSA Installation AMM task should include (or refer to) SBs /B/, /C/ or /D/, to be performed prior to installation of a THSA.

Swiss Intl. Air Lines is kindly asking EASA and Airbus to review the proposal above.

EASA response:



Comment noted

*Comments are not related to the content of the AD. AMM and CMM content are not under direct EASA approval.
Operators can always include the inspections in accordance with the applicable SB in their work orders and/or work cards.
No changes have been made to the Final AD in response to this comment.*

Commenter 2: Turkish Technic – Veysel Mutluyol – 24/01/2017**Comment # 2**

Refer to PAD 17-010, threshold is table 1 or 3 months, whichever occurs later.

On the other hand, in the table 1, there is no definition about “whichever occurs later” or “first”. So we assume that “whichever occurs first” definition must be used.

Could you please review that is it possible to add to the table 1 note 2 “whichever occurs later”?

Inspections:

- (1) Before exceeding the threshold as defined in Table 1 of this AD, as applicable to aeroplane type and model, or within 3 months after the effective date of this AD, whichever occurs later, and, thereafter, at intervals not to exceed the inspection interval values as defined in Table 1 of this AD, accomplish a DET of the THSA upper attachments and no-back housing in accordance with the instructions of the applicable SB.

Table 1 – THSA Upper Attachments / No-Back Housing Inspections

Affected Aeroplanes	Compliance Times (whichever occurs first, flight hours (FH) or flight cycles (FC))	
	Threshold (see Note 2 of this AD)	Inspection Interval (not to exceed)
A330, A340-200 and A340-300	4 000 FH or 1 000 FC	4 000 FH or 1 000 FC
A340-500 and A340-600	4 000 FH or 800 FC	4 000 FH or 800 FC

Note 2: The FH and FC referred to in column “Threshold” of Table 1 of this AD are those accumulated by the aeroplane since first flight, or since the last accomplishment of A330 or A340 Maintenance Review Board Report task 27.40.00/07, or since the last DET accomplished in accordance with the instructions of the applicable SB at original issue.



EASA response:

The “whichever occurs first” criteria must be used when reading Table 1.

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

Commenter 3: Air Canada – Francis Laliberté – 24/01/2017
Comment # 3

After review of PAD 17-010 ACA have the following questions :

As specified in note 2 of section (1), it is possible to take credit of the accomplishment of the last MRBR task 27.40.00/07 to define when the SB A330-27-3218 inspection mandated by this AD will be required. This MRBR task interval is currently set at 12,000 FH. This AD requires to perform the SB inspection every 4,000 FH or 1,000 FC.

- a) Does it mean in the future either the MRBR task interval will be revised to match the interval specified in this AD?
- b) Will it be possible to take credit of SB A330-27-3218 inspection for the accomplishment of MRBR task 27.40.00/07?

Thank you for your help

EASA response:

a) There are currently no plans to revise the MRBR task interval. Airbus is currently working on a final fix to replace the SB repetitive interval.

b) The task mandated by the AD matches with the MRBR task.

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

Commenter 4: Lufthansa Technik – Maximilian Pitzner – 13/02/2017
Comment # 4

I would like to comment PAD 17-010.

Could you please define, on EASA point of view, within §4 Note 3: “...or **since overhaul**...”?

Is a repair and service by passing the shop already an overhaul?



Thanks in advance

EASA response:

According to the EASA Form 1 – Block 11 filling instructions (ref. COMMISSION REGULATION (EU) No 1321/2014) , Overhaul “Means a process that ensures the item is in complete conformity with all the applicable service tolerances specified in the type certificate holder's, or equipment manufacturer's instructions for continued airworthiness, or in the data which is approved or accepted by the Authority. The item will be at least disassembled, cleaned, inspected, repaired as necessary, reassembled and tested in accordance with the above specified data”.

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

