



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-014

[Published on 25 January 2017 and officially closed for comments on 22 February 2017]

**Commenter 1: HI FLY – António Pedro – 26/01/2017**

### **Comment # 1**

SB A330-57-3114 and SB A340-57-4123

Revision 01 of above mentioned SBs have been issued in 13 Jan 2017. Please consider revising the final AD accordingly.

### **EASA response:**

**Comment agreed. The Final AD includes references to these SB revisions.**

**Commenter 2: HI FLY – Marta Rodrigues – 02/02/2017**

### **Comment # 2**

On paragraph of Reason Description, when referred SB A330-57-3115 Revision 01 and SB A340-57-4124 Revision 02, post-mod 44360 and pre-mod 55306 are mentioned as applicability conditions. These SBs covers both pre and post mod 44360 configuration. So in this case do you confirm that only pre-mod 55306 should be highlighted?

### **EASA response:**

**Comment agreed. In fact, the effectivity of the SB has not changed and it does not apply only to post-mod 44360 and pre-mod 55306 configuration. However, for this configuration, the revision brings some alleviation. The AD Reason section has been revised accordingly.**



**Commenter 3: Brussels Airlines – Robbie Vandenplas – 09/02/2017****Comment # 3**

BEL noticed that revision 01 of Airbus SB A330-57-3116 introduced lower thresholds and intervals compared to the original revision. BEL would like to point out that this decision induces that the inspection that were planned during C-check's for certain aircraft will become due before the next scheduled C-check. Following aircraft are affected:

A/C	Expected C-check	Due date SB A330-57-3116 rev 01	18 months after of AD*
SFY (MSN 0229)	28/10/2018	17/04/2018	01/09/2018
SFT (MSN 0291)	30/01/2019	12/10/2017	01/09/2018

\*We assume that the AD will be released beginning of March 2017

BEL would like to request EASA/Airbus to review the grace period and to confirm if it is structurally acceptable to increase the compliance time of 18 months since effective date of the AD to 24 months after the effective date of the AD.

**EASA response:**

**Comment not agreed. The risk assessment determined an acceptable exceedance of the new threshold(s) and reduced intervals as “24 months after September 2016”, which has resulted in 18 months after 23 May 2017, which is the Final AD effective date.**

**However, we noted that in the PAD, this ‘grace period’ inadvertently only applied to the threshold, whereas the intent was also to allow this for certain aeroplanes (previously inspected) to the reduced interval. A new Note 3 has been introduced in the Final AD accordingly.**

**Commenter 4: Air France – François Turpin – 14/02/2017****Comment # 4**

SB57-3115/4124 requiring important access with defuelinf/ventil of center tank, is it possible to get a grace period of 24 months in place of 18 months in order to get the next C check which interval is 24 months and which is much more convenient for this kind of operation?

**EASA response: Comment not agreed. See EASA answer to Comment #3 above.**



**Commenter 5: Hong Kong Airlines – Huang Yu –15/02/2017****Comment # 5**

For the Para (5) of PAD 17-014, could you please think about extending the grace period “18 months” to “24 months” as same as call out in SB A330-57-3129R00? This is a complicated mod that most Airlines have to do it in C check. And according to current maintenance schedule, 24 months is selected by most Airlines as the C check interval. So, I think 24 months grace period can allow most Airlines to arrange the mod in C check for the compliance to AD.

**EASA response: Comment not agreed. See EASA answer to Comment #3 above.**

**Commenter 6: Lufthansa Technik – Sarah Bender and Frederik Wolf – 20/02/2017****Comment # 6**

Repetitive Inspections, AD Paragraph (1):

A. As per threshold definition in the applicable Inspection SBs, the operator has to check the existence of a RDAS in the area of the FR40. If there is an existing RDAS in the area, the operator has to contact Airbus before next flight. If there is no existing RDAS, the operator has to perform the SDI of the fastener holes before next flight. This is not suitable for the operators. At beginning of a layover, the operator provides the maintenance organization with the applicable data. The operator therefore will contact Airbus in advance of the layover if there is an existing RDAS and will receive the new instructions from Airbus. The interaction with Airbus in case of an existing RDAS should not have any influence of the operation as long as the aircraft has not passed the compliance time. The AD only declares that the thresholds, intervals and instructions of the Inspection SBs are obliged.

Terminating Action, AD Paragraph (8):

B. In the Inspection SBs a lower bound is given for the implementation of the Optional Modification SBs for several configurations. In the Optional Modification SBs the lower bound is not given and the requirement is also not transferred to the AD. Does that means that the lower bounds does not have to be respected? What will be the consequence if the optional modification is performed below the lower bound.



- C. The Optional Modification SBs A330-57-3130 and A330-57-3131, respective A340-57-4137 and A340-57-4138, are declared as terminating action for the repetitive SDI as required by the AD. In the Inspection SBs A330-57-3115 Rev 01 and A340-57-4124 Rev 04, a post Modification SBs inspection program is defined, especially for hole H260. As per the Inspection SBs, the SDI of the hole H260 is not terminated by the implementation of the applicable Modification SBs and only the inspection interval is higher. If the initial inspection as per the Inspection SBs and the modifications are performed at an early stage, the inspection interval of the hole H260 will not be beyond DSG. Is it the intent of the AD that operators do not have to pay attention to this post inspection program of the Inspection SB A330-57-3115 Rev 01, respective SB A340-57-4124 Rev 02?
- D. As per instructions of the Optional Modification SB A330-57-3132, the inspection as per SB A330-57-3116 Rev 01 for configuration 001/002, 004 or 005, is only terminated for the holes H38, H39 and H43. The hole H25 is excluded and the inspection as per SB A330-57-3116 Rev 01 has to be continued. Is it the intent of the AD that operators do not have to pay attention to this exception? This exception is not detailed in the AD paragraph (8)?
- E. For the accomplishment of the Optional Modification as per SB A340-57-4139, the inspection as per SB A340-57-4125 Rev. 01 for configuration 002, e.g., is only terminated for holes H38, H39 and H43 if the modification as per SB A340-57-4139 is accomplished before the FC/ FH lower bound given in Appendix 01 of SB A340-57-4125 Rev. 01. The inspection requirement for hole H25 remains valid after accomplishment of SB A340-57-4139. Is it the intent of the AD that operators do not have to pay attention to this exception? This exception is not detailed in the AD paragraph (8)?

**EASA response:**

- A. Comment agreed. For SB A330-57-3115, SB A330-57-3116, SB A340-57-4124 and SB A340-57-4125, if no RDAS is found to exist for the FR40 area, it is acceptable to accomplish the SDI before exceeding the applicable threshold, instead of “before next flight”. Airbus confirmed that they are committed to correct this point in the next revision of the affected SBs. The Final AD has been amended to clarify this point.**
- B. Comment agreed. Terminating action as defined in paragraph (8) of the current draft AD is not an “absolute” terminating action in the sense that no further action would be necessary, except that any (possible) further action would not be those SDI as required by the AD. The nature of those additional action depends on the time of embodiment of the optional Mod SB, on the configuration and on the affected modified area. The Final AD has been amended to clarify that, if the optional mod is applied, the Inspection SB instructions (limits) have to be respected. If specified: Lower Bound must be respected, otherwise no full credit can be taken as per SB.**
- C. Comment agreed. Inspection SB instructions have to be respected – see also EASA answer to point B. above. Optional Mod SB can be terminating action when applicable, but there are some exceptions where optional Mod SB needs additional follow-on actions. The Final AD has been amended for clarification. In case an Optional Mod SB is (or was) done outside the specified limits, either the SDI as required by the AD are continued (no terminating action), or the operator should contact Airbus for an EASA approved Alternative Method of Compliance.**
- D. See EASA answers to points B. and C. above.**
- E. See EASA answers to points B. and C. above.**



**Commenter 7: Cathay Pacific Airways – Hyphen Choi – 21/02/2017**
**Comment # 7**

- A. Please specify the SB A340-57-4123 is in Revision 01 in PAD 17-014 Page 2 Note 1. Otherwise, the SB A340-57-4123 is read as Revision 02 which does not exist at the moment.
- B. PAD Table 1 has a column of “CWB Area” for inspection location. It is using “Above” and “Below” to indicate the CWB inspection area, which is unclear and subjective. It is better to explicitly mention the inspection SB number to avoid confusion.
- C. As a new AD is going to issue superseding the AD 2014-0149, in PAD Table 1 Compliance Time column, EASA please consider to count the compliance time from the effective date of the new AD instead of the AD 2014-0149.
- D. The inspection SB’s require the operators to upload the inspection report to AirbusWorld. This instruction is put under the SB RC (Required for Compliance) paragraph. However, the reporting has nothing to do with the airworthiness and is not related to compliance (PAD has no reporting requirement). As such, EASA please put a remark in the AD to explicitly mention the SB reporting is not related to AD compliance requirement.
- E. This PAD is related to number of SB’s which will create much documentation works upon the AD is issued. CPA would like EASA to consider to have the AD effective date to be at least 30 days after the AD issuance date, so that to allow us to have adequate time to setup the AD compliance requirements, especially it is already protected by the compliance of previous AD 2014-0149.
- F. For PAD Para 5, EASA please consider to extend the modification compliance time from 18 months to 24 months after the effective date of the AD, so that it can align our C check interval.

**EASA response:**

- A. Comment agreed. Note 1 introduced the concept of ‘applicable inspection SB’ and lists the A330 and A340 SBs in two groups. Where, after an SB, no revision level is mentioned, it should be understood to mean the original issue of that SB. Revision 1 therefore becomes an acceptable alternative. The Final AD has been amended to refer to ‘original issue’ in Note 1 for two SBs.**
- B. Comment partially agreed. Note 1 of the Final AD has been amended to include a reference, for each Inspection SB, to the area to be inspected, making a clear link to those indications in Table 1. The Table itself has not been amended, as this would reduce the readability of the Table and necessitate the repeat of the SB numbers. The Note was introduced to avoid that. It should be noted that compliance with an AD without (having access to) the applicable SB is not possible – having the SBs makes clear which area of the CWB is addressed by each SB – while the purpose of the AD is to specify when those actions must be done for each area.**



- C. Comment not agreed. The actions for pre-mod 44360 aeroplanes were already required by AD 2014-0149 and, as the Reason explains, this AD ‘retains the requirements’ of that AD, which means including the compliance times. Any aircraft that is currently non-compliant with the previous would otherwise (suddenly) have another 24 months to fly before action is required. From a safety perspective, this would not be acceptable. No changes have been made to the Final AD in response to this comment.**
- D. Comment understood, but not agreed. The purpose of an AD is to specify what (e.g. certain SB instructions) is required, not what is not required. Since the AD, as proposed, does not include any references to parts of the SB that are marked ‘RC’ (or not), these references in the SB are 9at this time) not relevant for AD compliance. In case an AD requires reporting, the AD must specify that explicitly. If such a requirement is not contained in the AD, following those SB instructions is at the operators discretion. No changes have been made to the Final AD in response to this comment.**
- E. EASA does not consider this comment to be specific for this PAD, but rather a comment on EASA AD policy [effective date = standard 14 days after AD issue date]. Since our standards are regularly reviewed, this (and other similar comments) will be considered in due time. Nevertheless, since this AD has a high level of complexity and concerns multiple SBs, the effective date of the Final AD has been set at 4 weeks after the issue date.**
- F. Comment not agreed. See EASA answer to Comment #3 above.**

**Commenter 8: HNA Aviation Technic Co., Ltd. – Robin – 7/04/2017**

**Comment # 8**

- A. For the Para (5) of PAD 17-014, could you please notify Hainan Airlines the final grace period in AD? If the final grace period could be 26 months or more will be great.
- B. For AD related to PAD 17-014, could you please notify Hainan Airlines about the determined issue date or effective date? This will be important to us, because some aircrafts have difficulty on planning and material availability.

**EASA response:**

- A. The ‘grace period’ of paragraph (5) of the Final AD is the same (18 months) as specified in the PAD. Comment not agreed. See EASA answer to Comment #3 above.**
- B. Comment understood. The EASA standard is an effective date 14 days after the issue date of the AD. In a PAD, we cannot predict the issue date, therefore we also cannot determine (at the time of PAD issuance) when an AD will become effective. See EASA answer to Comment #7, point E, above.**

