



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-028

[Published on 08 March 2017 and officially closed for comments on 05 April 2017]

Commenter 1: American Airlines – Richard Castle – 16/03/2017

Comment # 1

A. Subject PAD proposes to mandate Airbus SB A330-32-3281 Revision 01 on all A330 Series aircraft. This SB effectively supersedes Messier-Bugatti-Dowty (M-B-D) Service Letter (SL) A33-34 A20 in the effort to control reduced life parts manufactured outside of material specification requirements.

AAL has no particular concerns with this direction, however, we would like to point out that the subject PAD also references A330 ALS Part 1, revision 8 dated April 11, 2016, which, on pages 76 and 77 still references M-B-D SL A33-34 A20 Revision 07, dated 20-Jul-2012 as the source document on which to identify reduced life parts. AAL notes that there is no current EASA mandate against ALS Part 1, revision 8 but if one is being considered to supersede AD 2014-0009 for ALS Part 1 revision 7, AAL would recommend that ALS Part 1 be revised, possibly to revision 9, to update the part limitations notes to read SB A330-32-3281 revision 01 in lieu of M-B-D SL A33-34 A20 Revision 07, dated 20-Jul-2012.

B. Also, one minor comment on the Ref. Publications on page 3 of the PAD, SB A330-32-3281 Revision 1 is dated 31 January 2017 and not 05 February 2017 as stated in the PAD.

EASA response:

A. Comment agreed. An ALS variation is expected to be published by Airbus, in order to remove from ALS Part 1 the specific affected parts addressed by this final AD.

B. Comment agreed. However, in the meantime, Airbus published Revision 02 for SB A330-32-3281. The publication date of that SB revision has been inserted into the revised PAD.



Commenter 2: Cathay Pacific Airways – Bharat Yadav – 23/03/2017**Comment # 2**

A. The AISB lists the detailed Serial number of the part that have a reduced life limit. However, there is no relationship provided between the ALS component and the Higher assembly part number that an AMM procedure can be performed on in-service. This relationship document that links the “detailed PN to higher assembly PN –to appropriate AMM procedure” should be provided in order to ensure compliance can be performed to in-service aircraft that may or may not be in a maintenance input.

EASA are requested to ensure that the Airbus documentation provides the relationship for compliance purposes

B. The ALS revisions A330 and A340 ALS part 1 revision 8 published on 11 April 2016.

These ALS currently include the specific reduced life limits in the ALS of the SN listed in the AISB. The ALS must also be updated to Rev 9 to remove the reduced life limits at the same time as the AD issuance as otherwise the affected SN will have multiple life limits. If so, the ALS revisions referenced in the AD will require updating.

EASA response:

- A. Comment not agreed. The relationship between the higher assembly part number and the detailed part number is provided in the CMM which is available to the operator.**
- B. Comment partially agreed. See EASA answer to Comment #1, point A. Including a reference in the Final AD to Airbus ALS Variations, which are allowed to be used, confirms that another limit is acceptable (under certain conditions), thereby providing relief.**

