



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-051

[Published on 26 April 2017 and officially closed for comments on 24 May 2017]

Commenter 1: Hifly – Rui Cavaco – 28/04/2017

Comment # 1

We are in favour of an harmonization of the mandate by including term “Revision 01” on each reference to either Airbus SBs A330-32-3282 or Airbus SB A340-32-4311. Such Revisions were issued, not only but also, to address content anomalies.

EASA response:

Comment agreed. However, Airbus will soon publish Revision 02 of the applicable SBs, that will provide the correct lists of affected parts. The PAD has been revised accordingly.

Commenter 2: Airfrance – Baptiste Hericher – 02/05/2017

Comment # 2

The main reason for issued a proposal Airworthiness Directive (AD) is due to two additional MRO which have accomplished incorrect repairs. AFR would like some additional clarification:

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- Into SB A330-32-3282, the post life limit repair is 64100 FH & 50000 FC, whichever occurs first, for axles installed on A330-3xx WV 02x & WV05x and repaired by MRO 003.

While in PAD, the compliance time for the same aircraft and MRO 003 is 64150 FH & 50000 FC, whichever occurs first.

Is it a typo in PAD or not?



EASA response:

Comment agreed. There was a typo in EASA PAD 17-051. This has been corrected in EASA PAD 17-051R1.

Commenter 3: Lufthansa Technik AG – Steffen Widmer – 04/05/2017**Comment # 3**

LHT wants to avoid any misunderstanding regarding PAD 17-051 and therefore asks EASA to clarify paragraph (3) of this PAD. This paragraph states to replace an axle that is close to or has exceeded the post- repair life limit specified in the applicable Appendix. LHT assumes the wording “close to” means wheel axles which will reach their individual applicable life limit within 19 months after the effective date of the pronounced EASA AD. Please confirm this assumption or clarify how this wording is to understand.

EASA response:

Comment understood. In principle, for aeroplanes equipped with affected parts, applying the post-repair life limit for these parts is (as defined in the applicable Table of Appendix 1) by paragraph (2) of the AD. However, for aeroplanes equipped with affected parts that have exceeded or are close to exceed the post-repair life limit, Paragraph (3) provides a grace period. The compliance times between Paragraph (2) and Paragraph (3) is to be read whichever occurs later.

No changes have been made to the revised PAD in response to this comment.

