



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-112

**[Published on 10 August 2017 and officially closed for comments on 07 September 2017]**

**Commenter 1: Lufthansa Technik AG – Lars Weinerth – 11/08/2017**

### Comment # 1

After reviewing the document I figured out that the RAT PN mentioned in the PAD is not correct.  
I assume that the correct RAT PN should be 1704287G. In the PAD is two times the PN 170428G mentioned, which is not correct.

### EASA response:

**We agree. The RAT P/N is corrected to 1704287G in the final AD.**

**Commenter 2: British Airways – Aman Dhatt – 11/08/2017**

### Comment # 2

Having reviewed the PAD 17-112, I have noticed a discrepancy with the part number (P/N) given for the RAT.  
The P/N given in the PAD is 170428G, however in the A380 AIPC the P/N for the RAT module is 1704287G.

### EASA response:

**We agree. The RAT P/N is corrected to 1704287G in the final AD.**

**Commenter 3: UTC Aerospace Systems – Greg Kuczek – 11/08/2017**



**Comment # 3**

1. The primary reason for the PAD should be corrosion of the Uplock Hook and Hook Stop of the Uplock Assembly. The deployment solenoid moisture ingress issue is secondary. This reasoning is consistent with Airbus SB 24-8058.
2. The RAT part number notated in the PAD is incorrect. The correct RAT part number is 1704287G.

**EASA response:**

- 1. We disagree: The unsafe condition triggering the AD issuance is the loss of insulation resistance – as a result of the moisture ingress – and consequent loss of a possibility to generate electricity by the electrical generation device. The failure effect of this failure mode was identified as catastrophic or hazardous, therefore qualifying to meet the unsafe condition definition. Corrosion resistance improvement of the hook and hook stop is introduced at the opportunity of the SB 24-8058 but doesn't formally constitute the corrective action of unsafe condition addressed by this AD. No changes have been made to the Final AD in response to this comment**
- 2. We agree. The RAT P/N is corrected to 1704287G in the final AD.**

**Commenter 4: Korean Air – SoonKyu Hong – 07/09/2017****Comment # 4**

Since task is not easy and time-consuming, we cannot conduct on normal operation nor 1C or 2C, but usually doing on 3C (ISI) Check.  
Some KAL A380 aircrafts have more than two years to go to 3C Check. We cannot meet the deadline, if related AD is issued with 24 months deadline.  
Could EASA extend time limit to 36 months for this AD?

**EASA response:**

**Comment noted: It has been demonstrated that the potential effects of moisture cannot progress significantly during the next 48 months starting from October 2015 and the performance of the uplock is not affected during this period of time. However, to speed up fleet cleaning, a compliance time of 24 months from SB issuance was defined. Due to the actual impossibility to complete the retrofit in the 24 months, the retrofit duration is put back to its original value of 48 months starting from October 2015. It is therefore not possible to extend time limit to 36 months. No changes have been made to the Final AD in response to this comment.**

