



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-157

[Published on 07 November 2017 and officially closed for comments on 05 December 2017]

### Commenter 1: Qantas Airways – Ferdy Vidmar – 08/11/2017

#### Comment # 1

- A. The repetitive interval for the inspection using the inspection method #1, is specified as 150FH. Per the original AOT A53L012-16 and the new service bulletin A330-53-3178, the interval for method 1 inspection is specified as 150FC. Is this deviation from the service literature intended by EASA, or is it a typographical error?
- B. Note 4 wording concerning intermixing inspection methods and the interval to be applied should be clearer and more precise in its intention. My understanding of what is allowed by this note is that when changing inspection methods, the next inspection must be accomplished within the interval applicable for the inspection method used at the last completed inspection.

#### EASA response:

- A. **Comment agreed. That was a typo. We have amended the Final AD accordingly.**
- B. **Comment understood. EASA consider that Note 4 of the final AD is clear and no other adverse comments were received on that during the consultation period for the PAD. However, EASA confirm that your interpretation of the Note is correct. No changes have been made to the Final AD in response to this comment.**

### Commenter 2: Eastern Airlines Technic – Lu Qin – 13/11/2017

#### Comment # 2

In accordance with the description of the last paragraph of the Reason section, it's understood that SB A330-53-3275 is an optional terminating action for that repetitive inspection. To stress this is an OPTIONAL modification, not MANDATORY, it's better to use 'OPTIONAL modification of an aeroplane' instead of 'modification of an aeroplane' in the Terminating Action section/paragraph (5).



**EASA response:**

**Comment not agreed. EASA consider that the indication that an optional modification of an aeroplane that is specified in the Reason paragraph is sufficient. It is to be noted that Paragraph (5) that introduces that modification does not contain any compliance time for accomplishment of the modification.**

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

**Commenter 3: Cathay Pacific Airways – Jimmy Cheng – 22/11/2017**
**Comment # 3**

- A. CPA would like to request for the effective date to be 30 days in lieu of 14 days in general to provide sufficient time for operators to take appropriate action. CPA acknowledges EASA's previous response, mentioning that based on the PAD issuance, operators have adequate time between PAD issuance date to the effective date of the actual AD for preparation. However, from experience, PAD no doubt is an alert for operators, but in reality, this cannot be accounted as "time given" for operators to prepare due to:
- i. The requirements of the actual AD can differ from the PAD, which means a proper review of the AD would still be required when released. ALL necessary documents have to be issued/reissued to reflect these new AD requirements.
  - ii. There are cases where the AD mandated SB are not issued yet at the time of PAD or even AD effective date. For these similar cases, operators do not have anything to prepare with.
  - iii. Some AD do not have PAD for consultation in advance
  - iv. Sufficient time should be provided based on the fact that AD in general are becoming more complex, and operator would appreciate that sufficient time is provided in order to process these Airworthiness requirements.

Therefore please can EASA consider extending the standard of 14 days to 30 days, despite PAD 17-157 may seem straightforward.

- B. Can the AD specifically state if an inspection per SB-A330-53-3278 is required at all, if operators opt for an immediate terminating mod per SB-A330-53-3275?

**EASA response:**

**A. Comment not agreed. The extension of the period between issue date and effective date is only granted by EASA on an exceptional basis, e.g. complicated cases like several SBs to be accomplished on the same aeroplane. In this specific case, only one SB, or maximum two, is to be accomplished.**



***B. Comment understood. EASA confirm that there is no need to accomplish any inspection as required by the final AD if an operator decide to accomplish Airbus A330-53-3275 before any inspection is due. However, it is to be noted that Airbus A330-53-3278 (Terminating Action SB) contains inspection instructions that are to be accomplished concurrently with that SB embodiment.***

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

***Commenter 4: Lufthansa Technik – John Donegan – 30/11/2017***

***Comment # 4***

LHT suggests a flight hour grace period be included in the final AD for Action (1). Some aircraft which are below the flight cycle limit of 2016-0102 and PAD 17-157 may have already exceeded the flight hour limit.

***EASA response:***

***Comment not agreed. For an aeroplane that has already exceeded the inspection thresholds in terms of FH or FC, there is already a grace period that is given in paragraph (1) and allows operator not to ground any aeroplane.***

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

