



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-169

[Published on 12 December 2017 and officially closed for comments on 09 January 2018]

Commenter 1: Lufthansa Technik – Dennis Selinger – 14/12/2017

Comment # 1

To my mind this PAD is clearly stated and I agree with your requirements except “Credit (4)”. How can the replacement of RAT pump and re-identification of RAT module as required by paragraph (1) and (2) constitute compliance with the requirements of AD 2015-0008? AD 2015-0008 requires to modify the RAT actuator and to re-identify the RAT module according SBC ERPS06M-29-21.

New Hamilton Sundstrand Part Number RAT Modules

766351B
768084B
770379B
770952F
1702934E

PAD 17-169/ERPS06M-29-22 is introducing new and higher P/N of RAT pump and module compared to SBC ERPS06M-29-21(AD 2015-0008).

New RAT Module Part Number	
1702934F	768084C
770952G	766351C
770379C	

EASA response:

Comment agreed. The intent of “Credit” paragraph (3) in the Final AD [was §(4) in the PAD] is to confirm that, for an aeroplane on which the RAT Module is re-identified (new P/N), as required by this AD, that aeroplane remains compliant with the corresponding re-identification requirement (previous P/N) of EASA AD 2015-0008.

This is due to the fact that the final AD will require accomplishment of SB A330-29-3130 and A340-29-4098, which give instructions for concurrent application of SB A330-29-3126 (RAT actuator) which is required by EASA AD 2015-0008. Re-Identification according to the Final AD will create a



higher configuration level (new P/N) of the RAT module. However, since EASA AD 2015-0008 (compliance time expired July 2017) remains valid, the actions required by that AD are a pre-requisite for compliance with the new AD. For that reason, SB A330-29-3126 or SB A340-29-4097, as applicable, are identified in SB A330-29-3130 and SB A340-29-4098 as 'concurrent requirements'.

The Final AD has been amended to clarify paragraph (3) [was §(4) in the PAD].

Commenter 2: Air France – Clément Spanneut – 26/12/2017

Comment # 2

We just checked the PAD 17-169 and we understood from this that only the replacement of affected pumps and the re-identification of RAT modules fitted with affected pumps are mandatory. Indeed, contrary to EASA 2013-0274 & 2015-0008, which deals also with replacement/re-identification of RAT sub-components, the re-identification of not affected pumps and RAT modules is no longer mandatory in this PAD.

On our side, we think that it would be better if the re-identification of not affected pumps and RAT modules remained also mandatory. This will reduce the number of configurations to manage at level of RAT pump and RAT module P/N and allow us to have a better overview of RAT configuration. As this step is less urgent than replacement of affected pump, we can imagine a longer deadline if needed.

EASA response:

Comment understood, but not agreed. EASA considers that AD action is necessary when an unsafe condition is present. For non-affected RAT hydraulic pumps, no unsafe condition is present, hence no AD action is necessary.

The re-identification in the SB is useful for tracking purposes, so it is highly recommended. It will help to organize a clear and traceable configuration management of parts installed on aeroplane and in stock, hence contributing to airworthiness and safety.

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



Commenter 3: Sichuan Airlines – Zhong Jiefu – 27/12/2017**Comment # 3**

CSC schedule to perform EASA PAD 17 -169(Airbus SB A330-29-3130) on B-8962(MSN 1780).According our Material Dep feedback, Airbus FHS Dep only provide the spare pump (PN:4207903) rather than the PN:4207906 required by Hamilton SB ERPS06M-29-22(SB ERPS06M-29-22-3.ACCOMPLISHMENT INSTRUCTIONS-D. Assembly paragraph) due to PN:4207906 has not been approved by CAAC.

CSC want EASA to confirm whether the PN:4207903 is available to meet the upgrade requirement of EASA PAD 17-169(SB A330-29-3130)?

EASA response:

Comment understood, but not agreed. After some contact with Airbus, the issue seems to be related to parts availability depending on approval status in front of national Aviation Authorities which is not subject of EASA responsibility. This cannot be regulated by this Final AD. For further support, Airbus has to be contacted.

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

