



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-002

[Published on 11 January 2018 and officially closed for comments on 08 February 2018]

Commenter 1: Lufthansa Technik AG – Stefan Haberkorn – 06/02/2018

Comment # 1

After reviewing PAD 18-002, I would like to suggest amending the required action (2) “Replacement” as follows:

Replacement:

(2) For Group 1 aeroplanes: Replacing an affected THSA on an aeroplane with a THSA having the corresponding P/N listed as “new” in Table 1 of this AD, within 8 months after the effective date of this AD, is an acceptable method to comply with the requirements of paragraph (1) of this AD for that aeroplane.

This makes this part of the required actions as clear as actions 1 and 3 are.

1. Replacement concerns only group 1 aeroplanes since it is defined in the definitions part : Group 1 aeroplanes are those that have an affected THSA or affected ballscrew installed.

2. The Compliance Time is also clearly mentioned in the action “Replacement”.

EASA response:

Comment understood, but not agreed. Paragraph (2) is not a requirement, but an alternative (acceptable) method.

Since §(1) applies only to group 1 aeroplanes, there is no need to add that into §(2).

Since the purpose of the alternative method (replacement) is ‘to comply with the requirements of paragraph (1) of this AD’, the compliance time of §(1) applies for that alternative.

Based on these considerations, EASA is confident §(2) is clear enough.

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



Commenter 2: Air France – Olivier Nempont – 08/02/2018**Comment # 2**

- A. By reading the PAD and the SB related, I am surprised to see 5 SB Airbus and 1 VSB UTC. Is it not possible to make simpler with only one SB AIB knowing that there is only one SB UTC?
- B. In § (3) Part Installation, it is assumed that an affected ballscrew assembly can not be installed on post SB THSA. AD compliance is granted by THSA PN, so why do you had “or affected ballscrew assembly”?
- C. I have also noted a mistake on the Weight and Balance notified on SB AIB. SB UTC shows W/B : +0.384KG and SB AIB W/B : not changed.
- D. I think that it would be more simple for all to have directly the accomplishment instruction correctly detailed in the SB AIB instead to have “Modify in accordance With Ratier-Figeac SB FE380-27-11”. By this way 2 technical documentations must be take into account by the operator and create burden. Moreover, AIB SB has no reference to the UTC VSB rev number. Is it possible that the accomplishment instruction to be performe directly on aircraft, is correctly detailed on the SB AIB whitout refering to Vendor SB?
- E. Most of name plates of components installed on A380 are bar-coded, and are supplied only by the manufacturer. Therefore, part reidentification becomes more complex and requires additional time. Did AIB and the manufacturer take into account the additional time introduced by this new procedure? PAD notifies only 8 months to do the THSA modification with a summer period. So it is a short delay. To conclude: this is hard to manage appropriate reactivity in such short delay and associated process.

EASA response:

- A. Comment understood but, as this is related to Airbus SB common practice (policy), should be addressed to Airbus.**
- B. Comment understood. The Final AD has been amended to clarify the references to ‘affected ballscrew assembly’, as these need to be modified, and re-identified.**
- C. Comment understood but, as this is related to Airbus SB common practice (policy), should be addressed to Airbus.**
- D. Comment understood but, as this is related to Airbus SB common practice (policy), should be addressed to Airbus.**
- E. Ratier-Figeac has a substantial kits production capacity to sustain this retrofit. They have also already produced all name plates, customized to each aircraft MSN. Consequently, there should be no logistical problems causing delay.**

No changes have been made to the Final AD in response to points A, C, D and E of this comment.

