



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-008

[Published on 22 January 2018 and officially closed for comments on 19 February 2018]

Commenter 1: Delta Air Lines – Kimberly Davis – 16/02/2018

Comment # 1

Delta concurs with the proposed PAD 18-008. In support of this PAD, Delta would like to provide the following small comments.

While Delta Air Lines does not technically operate under EASA rules, we see several benefits in participating in EASA rulemaking process. For Airbus Service Bulletins, the EASA PAD and AD language often becomes the framework for the FAA NPRM and AD. Also, the industry hoped for improvement are increased with greater participation in the coordination and review process.

- A. The “Applicability” paragraph can create burdens to prove our compliance depending on exact wording. The current Applicability statement basically states “All 350 A/C, except with mod x or y embodied in production”. Due to the effectivity in the SB, only 1 Delta A/C is affected. However the proposed Applicability paragraph places us in a position to prove that all remaining A/C are not affected. In this example, a slight change in wording can have a big impact. For example, EASA AD wording such as “This AD applies to Airbus A350 aircraft as identified in S/B A350-52-P012” now defines only the applicable AC are we are no longer burdened to prove compliance for our remaining fleet. Therefore Delta proposes that the applicability paragraph be reworded to “This AD applies to Airbus A350 aircraft as identified in S/B A350-52-P012”.
- B. There is a lack of clarity if reporting is mandatory. The S/B includes reporting procedures, located just after the installation images. Since the installation images are mandatory, the reporting could be interpreted as mandatory. The first General Note attempts to clarify what is mandatory, but the reporting procedures page does not state “refer to” or “in accordance with”, and therefore it is unclear if reporting is mandatory. Delta believes that reporting is not related to correction of the identified problem, and therefore Delta proposes that the EASA AD state that reporting is not mandatory.
- C. The “Test” Section in S/B A350-52-P012 actually consists of “Close” tasks not “Test” tasks. If you compare the task numbers in Section 3.D with the task numbers in Section 3.E, you find they are the same numbers. The fifth General Note states that Sections 3.C and 3.D are Required for Compliance (RC), whereas the other sections are granted more flexibility. Since Section 3.D is actually a close section in this S/B, Delta proposes that the AD state that only 3.C is required for compliance (RC), and that Section 3.D is granted the additional flexibility discussed in the fifth General Note.



EASA response:

- A. Comment understood. The final AD will be updated accordingly. : “Airbus A350-941 aeroplanes, manufacturer serial numbers as listed in Airbus Service Bulletin (SB) A350-52-P012.”***
- B. Comment understood but, the common practice for reporting is to report only if the AD mandates this.***
- C. Comment understood but, as this is related to Airbus SB common practice (policy), should be addressed to Airbus.***

No changes have been made to the Final AD in response to points B and C of this comment.

