



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-012

[Published on 29 January 2018 and officially closed for comments on 26 February 2018]

Commenter 1: Lufthansa Technik AG – Tobias Doetsch – 31/01/2018

Comment # 1

I would like to comment on the time limit given for the modification. PAD 18-012 states, that all affected hoses have to be replaced before exceeding 12 years since first flight of the aeroplane. This is contrary to the maintenance clock starting point definition given in the MPD which states as a general rule:

“The date of first Transfer of Title (ToT) may be used as the starting point for [...] tasks with intervals expressed in airframe FH, FC or Calendar Time.”

The modifications of SB A380-35-8035 require a substantial effort for access and close up and therefore are only to be performed in a heavy maintenance event (D-Check) The given limit of 12 years is also indicating in this direction.

However, by starting the 12 years calculation at the date of the first flight, the D-Check starting point would have to be brought forward by 4-7 month!

Example D-AIMD (MSN 0048):

Date of first flight: 29 APR 2010

Date of ToT: 28 OCT 2010

Due date of PAD: 29 APR 2022

Scheduled date D-Check: 17 OCT 2022

Please revise the starting point of the 12 year limit. All D-Check starting dates are based on the transfer of title as the starting point and thus later than 12 years after first flight.

EASA response:

Comment agreed. The Final AD has been amended accordingly.



Commenter 2: Emirates – Muhammad Ali – 14/02/2018**Comment # 2**

Emirates being the fleet leader is heavily impacted by the nature of this AD, and in order to provide a cushion the following is proposed:

Proposal : Currently two aircraft from our fleet have already undergone 12 yearly check, therefore, in order to club the work required by this PAD/ A380-35-8035 with a scheduled grounding it is requested that the second condition “30 days from effective date of this AD” may please be changed to “36 MO from the effective date of this AD”.

Reason : This will enable the operators to club the task with upcoming C-Check and avoid standalone grounding considering the extensive preparation / work required.

Justification : The older aircraft are already inspected via EASA AD 2012-0267 (Leak check of distribution pressure line) at an interval of 5000 FH.

EASA response:

Comment partially agreed. Initially, a grace period was introduced when the compliance time was 12 years since first flight. Now (see EASA answer to Comment #1 above) the compliance time is amended to 12 years since date of manufacture. With this change applied to the Final AD, no aircraft will have exceeded the compliance time, therefore a grace period is no longer necessary. The risk assessment does not allow an extension to 15 years to perform the modification.

Commenter 3: Air France – Philippe Rudnianyn – 14/02/2018**Comment # 3**

Initially, this modification was introduced through RIL L35M16011321 R00 dated 11 may 2017 which specified that “Airbus SB A380-35-8035 must be accomplished during 12Y check and will be rendered mandatory. This modification is requesting significant access”.

Further to that, we have transmitted to Airbus the planning of the next 12Y checks of all our A380 fleet as follows:

MSN 0033 HPJA - 12Y 28OCT 2021 TO 15DEC 2021.

MSN 0040 HPJB - 12Y 09FEB 2022 TO 29MAR 2022

MSN 0043 HPJC - 12Y 13APR 2022 TO 31MAY 2022



MSN 0049 HPJD - 12Y 11AUG 2022 TO 28SEP 2022

MSN 0052 HPJE - 12Y 16MAY 2023 TO 03JUL 2023

MSN 0064 HPJF - 12Y 16JUN 2023 TO 03AUG 2023

MSN 0067 HPJG - 12Y 04JUN 2024 TO 22JUL 2024

MSN 0099 HPJH - 12Y 01MAY 2024 TO 18JUN 2024

MSN 0115 HPJI - 12Y 12SEP2025 TO 30OCT 2025

MSN 0117 HPJJ - 12Y 22JUN 2026 TO 09AUG 2026

At the same time, we had confirmation from Airbus Retrofit Operations Manager, Mr Pascal Mercier, on 22 May 17 that “as per RIL instructions, we highly recommend performing this modification during 12 years checks due to Man Hours involved and accesses required.”

Then, the RIL L35M16011321 R01 dated 24 January 2018 was issued to update EASA AD expected issuance date and modify the schedule by introducing the accomplishment of the modification within 12Y after first flight instead of 12Y check forecasted initially.

Few days after, the PAD 18-012 was issued on 29 January 2018 with the same compliance time.

The problem for us is that the compliance time is not in phase with our 12Y check schedule which generate a gap (delay for embodiment of the modification) of minimum 5 months for MSN 117 and maximum 9 months and 2 weeks for MSN 064 (see the excel file enclosed for the whole fleet).

Taking into account this gap, we ask you to review your position about the compliance time concerning the PAD 18-012 and in the frame of the future AD, to propose to all A380 operators a new compliance time as follow:

- either a target date which not exceed the 12Y check of the a/c (in phase with the Airbus recommendations);
- or a target date which not exceed 13Y after the 1st flight (in phase with our 12Y check schedule).

EASA response:

Comment agreed. See EASA answer to Comment #1 above.

