



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-040R1

[Published on 26 September 2018 and officially closed for comments on 10 October 2018]

**Commenter 1: SunExpress Deutschland GmbH – Stefan T. Ströker – 26/09/2018**

### Comment # 1

Regarding the newly issued EASA PAD 18-040R1, I would recommend to insert a chapter of informative nature that revision of Aircraft Maintenance Programs (AMPs) has to be taken into consideration. And that the time is restricted for that measure, because of mandatory Competent Authority approvals of AMP's. Relevant EASA PAD excerpt:

After EASA PAD 18-040 was published, it was determined that the compliance time for the DET needs to be reduced, which would make the proposed required action more restrictive. In addition, some editorial changes are introduced to align the requirements of the AD with the content of the SBs. This PAD is revised accordingly for additional consultation.

### EASA response:

**Comment not agreed. The final AD only contains the required actions (repetitive inspection) and a terminating action (optional, at the discretion of an operator) for these repetitive inspections. EASA consider that there is no need to insert any action related to amendment of the AMP in cases where a terminating action is available. It is at the discretion of an operator to insert these inspections into an AMP, and then up to the competent NAA to accept or not that amendment of an AMP as acceptable for compliance with the final AD.**

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



**Commenter 2: Delta Air Lines – Tara Jain – 08/10/2018****Comment # 2****References:**

(A) EASA Proposed Airworthiness Directive: PAD No. 18-040R1, dated 26 September 2018

(B) Airbus Service Bulletin (SB) A330-71-3035

(C) Airbus Service Bulletin (SB) A330-71-3036

(D) Goodrich Aerospace Service Bulletin (SB) CF6-80E1-NAC-71-048

Based on the Ref (A) Applicability paragraph, all manufacturing serial numbers of Airplanes A330-201, A330-202, A330-203, A330-301, A330-302 and A330-303 aeroplanes are affected.

Upon further reading Ref(A) Reason paragraph, it is identified that only A330-201, A330-202, A330-203, A330-301, A330-302 and A330-303 aeroplanes fitted with General Electric CF6-80E1 engines equipped with air inlet inner barrel lower panel P/N 277-1121-505 and P/N 277-1121-509 (which are identified in Ref (B), (C), and (D)) are applicable to this proposed ruling.

Comparing the two paragraphs, it seems that while the Ref (A) Applicability paragraph indicates a wider range of A/C being effective which identify the affected units at the airframe level and citing all manufacturing serial numbers. Whereas the requirements of the proposed ruling pertain to specific affected part number installed on the General Electric CF6-80E1 engines fitted on particular A330 configurations.

Therefore, DAL requests additional clarification in the Applicability paragraph to indicate all serial manufacturing numbers of A330-201, A330-202, A330-203, A330-301, A330-302 and A330-303 aeroplanes fitted with General Electric CF6-80E1 engines installed with P/N 227-1121-505 and 227-1121-509 (post mod 203989) as being effective.

**EASA response:**

***Comment not agreed. EASA consider that this AD must be applicable to all MSN for which the affected parts are eligible for installation. Having defined Groups of aeroplanes, it is ensured by paragraph (6) that, for aeroplanes that currently do not have an affected part installed (Group 2 aeroplanes), in case an affected part is installed in future, that aeroplane (which then effectively becomes a Group 1 aeroplane) is subject to the inspections required by the AD.***

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

