



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-052

**[Published on 12 April 2018 and officially closed for comments on 10 May 2018]**

**Commenter 1: Lufthansa Technik – Sebastian Eichentopf – 12/04/2018**

### Comment # 1

Please be informed that, in contrast to SB 57-8189, SRM task 57-56-338-809 is not mentioned in the PAD under §“Affected SRM repair”.

### EASA response:

**Comment agreed. The task number has been added to the definition of ‘Affected SRM repair’ in the Final AD.**

**Commenter 2: Qatar Airways – Vitto Paolo Sarceno – 30/04/2018**

### Comment # 2

- A. In reference to Paragraph (2) Corrective Actions, in case an existing repair is found on the inspection area but we cannot confirm the SRM repair reference used, please confirm that the following actions apply:
- Within 30 days, contact Airbus and provide as much information as possible on the existing repair, for approved corrective actions.
  - Within 12 months after the GVI and detection of existing repair, accomplish the approved corrective actions from Airbus.
- B. In reference to Paragraph (3) SRM Limitation, we want to highlight that the SRM illustration for outboard flap zoning can be confusing and may contribute to incorrect interpretation and inadvertent accomplishment of SRM repair on restricted areas (ZONE A). We find it difficult to distinguish between thicker solid lines (zone perimeter) and thinner broken lines (ribs/spars). We have reported this to Airbus for immediate enhancement to the SRM illustrations.

### EASA response:

**A. EASA confirms both actions are required, as specified.**



**B. Comment noted.**

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

**Commenter 3: Qatar Airways – Vitto Paolo Sarceno – 04/05/2018**

**Comment # 3**

In reference to Paragraph (1) Inspections, we want to clarify the actual requirements of the proposed AD. The current requirement in SB A380-57-8189 Rev 00 is to perform GVI of the inspection area to detect existing repair(s). Then, irrespective of the GVI results, the SB instructs to operators to check the aircraft records for repairs done in the inspection areas between September 2011 and June 2015.

Questions:

- A. From our understanding, all the possible SRM repairs that may exist on the inspection areas, can be detected visually. If necessary, paint can be removed from the inspection areas to enhance detectability. Therefore, we understand that in case there is no existing repair found on the inspection areas during physical GVI, then aircraft records check should no longer be necessary. Correct?
- B. If EASA agrees to QTR understanding, can EASA re-phrase the requirement in Paragraph (1) Inspections to read as follows:  
 “Within 10 months after the effective date of this AD, accomplish a GVI of the affected locations, **and if existing repair is found**, accomplish a records check of the related repair reports in accordance with the instructions of the SB.”

**EASA response:**

**A. Comment not agreed. Some repairs may not be detectable, even by GVI, which makes the records check still relevant.**

**B. Comment not agreed. See EASA answer to point A. above.**

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

