



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-088

[Published on 26 June 2018 and officially closed for comments on 24 July 2018]

### Commenter 1: HONG KONG AIR CARGO CARRIER – Crystal Tse – 27/06/2018

#### Comment # 1

Referring to subject PAD 18-088, noticed the applicability include A330-243 and did not include A330-243F, HKC would like to confirm that, in general, if the applicability of the AD/PAD included A330-243 but did not include A330-243F, then the AD/PAD should not be applicable to A330-243F.

Many thanks and look forward to your favorable reply.

#### EASA response:

**Comment noted. Airbus A330-243 and A330-243F aeroplanes are different aeroplane models. It is EASA standard practice to identify each affected model in the Applicability, except when a type design is out of production, in which case sometimes the expression ‘all models’ is used. Consequently, if an AD applies to A330-243 aeroplanes, it does not automatically follow that it also applies to A330-243F aeroplanes. For this specific topic, this AD is only applicable to A330-243 aeroplanes, if equipped with Flight Control Primary Computer (FCPC) having software standard MRTT3 (hardware 2K2), or earlier software standard. Airbus confirms that, according to their data, no Hong Kong Air Cargo Carrier aeroplanes should be affected by this AD.**

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

### Commenter 2: Avianca – Diego Lamartine – 28/06/2018

#### Comment # 2

As per PAD 18-088, is it possible to extend the timeframe of 9 months, as per parag. (1), to 12 months in order to avoid customs?

In Brazil, we have a lot problems with the customs that may impact on AD accomplishment with this timeframe (9mo).



**EASA response:**

***Comment not agreed. The 9 months compliance time is the result of the risk assessment calculation. Any extension of the determined period, which is subject to approval by the competent authority (State of Registry of the aircraft), would likely affect the safe operation of the aircraft. After consultation with Airbus, no Avianca aeroplanes should be affected by this AD.***

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

**Commenter 3: Etihad Airways – Borja Dosal Roiz – 15/07/2018**
**Comment # 3**

Even though Etihad does not fly A330 MRTT, we would like to express the following comments on recently released EASA PAD 18-088.

- A. EASA PAD 18-088 mentions software P/N LA2K2B100T30000 while referring to software standard MRTT3, but does not provide reference to software P/N LA2K2B100T40000 when referring to software standard MRTT4. Please consider the possibility to include software P/N LA2K2B100T40000 while referring to software standard MRTT4.
- B. According to latest revision of VSB LA2K2-27-024 R01, there are two possible ways to reach software P/N LA2K2B100T40000 (std MRTT4) on FCPC hardware LA2K2:
  - o Airbus SB A330-27-3225 (mentioned in the PAD) will evolve the FCPC from software P/N LA2K2B100T30000 (std MRTT3) to software P/N LA2K2B100T40000 (std MRTT4).
  - o Airbus SB A330-27-3227 (not mentioned in the PAD) will evolve the FCPC from software P/N LA2K2B100DH0000 (std P15/M24) to software P/N LA2K2B100T40000 (std MRTT4). Please consider including SB A330-27-3227 in the EASA AD as an additional way to reach the mandated software P/N LA2K2B100T40000 (std MRTT4).

**EASA response:**

***A. Comment agreed. The P/N LA2K2B100T40000 for software standard MRTT4 has been added in the Final AD.***

***B. Comment understood. After coordination with Airbus, it was decided to keep only Airbus SB A330-27-3225 as required by the Final AD. Airbus SB A330-27-3227 is part of an STC modification to convert a civil A330 aeroplane into a military MRTT version, to be done at the discretion of an operator. No changes have been made in the Final AD in response to this comment.***

