



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 15-154

[Published on 16 December 2015 and officially closed for comments on 13 January 2016]

**Commenter 1: Lufthansa Technik – John Donegan – 16/12/2015**

### Comment # 1

- A. As noted in A330/A340 operator caucus dating back already to 2014 (attached document) at which EASA was present and similar discussion at the A300/A310 meeting in 2015 (at which EASA was also present), operators clearly stated the difficulties in showing compliance with a single AD which mandates several SBs. An individual AD was clearly requested for each SB by the operator body, representing the industry (Page 23 of 25 SMWG MEETING # 36 AND STG #10 REPORT - attached). While a single AD is clearly reducing the workload for EASA and Airbus, a compliance issue will become very burdensome with a single AD with very many different compliance dates, mixed effectivities, some steps which will be closed while others will remain open until final embodiment of the very last SB; most of the technical subjects also have no relevance to each other. In recent years the EASA has held several workshops to improve ADs for operators with a mind to increase usability. With this at the forefront, we reiterate the industry request for an individual AD for each individual SB as has been the traditional way of mandating actions (perhaps with the exception of the AD on the ALS Part – which at least refers to a single Airbus document). We would plead not to launch a precedent for grouping/bundling SBs, just because they were launched out of the same exercise, particularly when they are not dealing with the same technical subject.
- B. We request removal of all mention of the Limit of Validity (LOV) “extension” within the Reason section as this does not reflect the EASA definition of this term, which relates solely to a defined time period which precludes widespread fatigue damage. The LOV has not been extended, the definition has been completely changed. In the case of the A340-200/-300 the “extension” of the aircraft life to LOV, does not mean that it was extended from the old LOV, as that value (e.g. Design Service Goal/DSG/ISG/ESG/ESG2/MPPT) does not have anything to do with WFD. As this PAD may be taken as a basis for further aircraft models (but we very much hope not; see point 1) language referring to LOV extensions should be avoided, which would only make it unclear as to technically, what was extended. This problem was already foreseen by the operators as noted on Page 3 of 9 S-MWG/STG/ZWG 2015.1 – Operator Caucus (attached), where authorities were encouraged not to use terminology which already exists in the industry, for new definitions.
- C. SB 53-4201 and 53-4202 are presumably also available on operator’s request (contact Airbus), as these were not yet distributed to operators.
- D. Lufthansa request EASA not to “pre-mandate” any SBs which have not been published, as they will not appear on our “SB status” list until such time as a publication date and document has been issued to the CAMO for evaluation. This would also set a precedent, to issue an AD before a service action has been set.



Lufthansa Technik had already queried the deletion of Section 3 in an Airbus Service Request where we clearly saw the need for clarity before a decision was made on how to proceed (see email attachment). Unfortunately, it would appear not to have been considered in the publication of 15-154.

**EASA response:**

- A. Comment partially agreed. An action number has been inserted for each required SB/MOD in Table 3, which will facilitate identifying and recording separate compliance with each modification required by this AD, e.g. paragraph (1) – Action (3).**
- B. Comment agreed. The Reason section of the Final AD has been amended accordingly, making reference to Airbus OIT-999-0133-14.**
- C. and D: Comments understood and agreed. The references to those SBs that are not yet published (currently only made available on request) have been deleted from the Final AD. These references should be inserted in a revision of the AD when the SBs are published and made available to operators.**

**Commenter 2: Cathay Pacific – Miikka Antila – 23/12/2015**

**Comment # 2**

Regarding this new PAD 15-154 Appendix 1 (3) table 2, Window of embodiment: For the SB 53-4135 there is a requirement not to accomplish the SB too early but CPA has already accomplished the modification as per earlier revision.

- A. CPA requires EASA to add a statement that if already accomplished it still comply with the AD requirement. The modifications have been accomplished between 7,622 and 8,112 FC. Just earlier than PAD proposal of 9300 FC.
- B. Also there are several typo errors on the table 3 with SB 53-4201 and 53-4202.
- C. [received later] For SB 53-4201 and 53-4202 the compliance time for LS and SR operation seems to be same and we feel that should not be right.

**EASA response:**

- A. Comment partially agreed. The relevant Note (3) in Appendix 1 of the Final AD has been amended accordingly.**
- B. Comment understood – see EASA answer to Comment #1, points C. and D.**
- C. Comment not agreed. The compliance time was determined by risk assessment (calculation) and the outcome was a single FC limit. No changes have been made to the Final AD in response to this comment.**



**Commenter 3: Lufthansa Technik – John Donegan – 15/01/2016****Comment # 3**

Lufthansa has performed a further internal review of PAD 15-154. While the consultation period is unfortunately closed, we feel the following additional comments are of high importance and can hopefully be considered before a decision is released:

- A. With regards to Service Bulletin 53-4065 and 53-4135, the PAD refers to Revision 04 and Revision 03 respectively. Allowance is required for aircraft on which the SB was already performed at an earlier revision. For example, 53-4135 Revision 03 states that “No additional work is required for aircraft modified by any previous issue”. Therefore, the performance solely in accordance with the latest revision should not be required.
- B. Appendix 1 Note (3) of PAD 15-154 gives a window of embodiment, before which the modification is not to be performed. These SBs in Section 1.E “Compliance” do not contain any such restrictions. In fact, worse, they gave much lower thresholds by which the modification must be embodied, leading to an early implementation. Allowance is required for aircraft which have already embodied the modification before the limits given in Appendix 1 Note (3). The applicable embodiment limit for 53-4135 in accordance with SB 1.E. is 8000 FC at the latest (excluding grace period). Now, operators are ordered not to embody before 9300 FC. Operators were pushed for early implementation and now have been penalized.
- C. Appendix 1 Table 3 lists compliance times. After a spot check, Lufthansa notes that some of those values do not match with the Paragraph 1.E. “Compliance”. E.g. A340-53-4135 R03 for Group 43B in the LR configuration is 12000 FC/81400 FH. In accordance with 1.E. of the Service Bulletin, the corresponding threshold would have been 8000 FC and 54300 FH. Is it intentional to deviate from the published SB compliance limits?

We appreciate you considering these comments, in order to have workable documents and full compliance.

**EASA response:**

**A. and B: Comments agreed – see EASA answer to Comment #2, point A.**

**C. Comment noted. The correct values are those in the Final AD, and the AD prevails over the SB indications. The mismatch is intentional. These SBs were published at a point in time when those values were correct. The activities described in the Reason section of the AD have led to reconsider those values, as a result of which they have become obsolete. Airbus has committed to correct those values in the SBs at the next revision opportunity. No changes have been made to the Final AD in response to this comment.**

