



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-116

[Published on 16 August 2018 and officially closed for comments on 13 September 2018]

Commenter 1: Company name – N/A – Dahg Ramy – 02/09/2018

Comment # 1

As the cause of this issue has been identified, all the bushes on all types of aircraft where the application of zinc and nickel surface protection has been applied should be identified. Or such protection has been applied only at the bulk cargo door level of the A350?

Since loose luggage are allowed at the bulk cargo compartment, the door is subject to damage causes if the nets have not been placed correctly, does such damage (hinge arm disconnection) been reported only on the bulk cargo doors with the affected PN of the AD due to the A350 bulk door design ? Generally what kind of damage a loose luggage could cause to the bulk cargo door if not protected with nets or other means ?

EASA response:

Comment not agreed. The design principle of bonded zinc nickel coated bushes and its repercussions are unique to the A350 bulk cargo door; the design has been modified in the meantime. Therefore only bulk cargo doors with the S/N determined by the AD are affected. As per the instructions published by Airbus, the door area of the bulk cargo compartment, when loaded, must be protected by cargo nets; provided that is done, loose luggage cannot cause damage to the bulk cargo door.

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

Commenter 2: Cathay Pacific Airways Limited – Hyphen Choi – 03/09/2018

Comment # 2

EASA is suggesting the re-identification method in Note 1. However, the instruction is not technical specific enough. CPA would like EASA to confirm, if it is acceptable for re-identify the post-SB BCD with stenciling method (i.e. A350 MP Task A350-A-11-XX-XX-00001-691A-A) as alternative.



EASA response:

Comment agreed. The door re-identification method in Note 1 has been coordinated with Airbus; it is expected that a future revision of the SB will contain a re-identification method, which will be very similar. Alternatively, using the stenciling method (A350 MP Task A350-A-11-XX-XX-00001-691A-A) for permanent marking onto a standard alu identification plate instead of indelible ink, is acceptable.

The Final AD has been amended accordingly.

Commenter 3: Finnair Plc – Harri Kuisma – 13/09/2018
Comment # 3

”Note 1: In absence of detailed instructions for BCD re-identification in the original issue of the SB, the following method is acceptable: After cleaning of a suitable surface next to the door label, install a standard identification plate (e.g. NSA9117M7S), write the SB number on the identification plate with indelible ink, and protect it with polyurethane varnish for external structure.”

This is good requirement. We have noted the traceability problem of SB’s implemented to DOOR. The traceability is not readily available and require some investigation during door removal/Installation.

Re-identification is missing on other DOOR related SB’s as well.

EASA response:

Comment noted. In future door-related SBs and SB revisions introducing a modification, Airbus will include a re-identification step to ease door identification. See also EASA answer to Comment #2 above.

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



Commenter 4: Lufthansa Technik AG – Andreas Uhl – 13/09/2018**Comment # 4**

In chapter “Reason” of the PAD the inclusion of a Re-Identification Procedure with an upcoming SB A350-52-P015 Revision 01 is announced. Until the SB revision is available, the installation of a “Standard Identification Plate” stating the SB number is mentioned as an acceptable interim solution.

Airbus engineering already stated that with revision 01 of the SB, above solution, an identification Plate displaying modification SB information will be the selected type of identification.

According to our understanding of Part 21 Subpart Q - 21.A.804 und 805, critical parts must be serialized and must have a definite partnumber in relation to their applicable design data. In the case of a change in design/redesign, with differing design data, as in the case of SB A350-52-P015, a new partnumber has to be created. Therefore only the installation of a “Standard Identification Plate” with modification SB number is not an appropriate method to cover this rule, nor an appropriate way to trace critical parts throughout their life. The part/sparepart handling systems/software widely used in the aviation industry are all working on a partnumber basis.

Using the same partnumber for different AD configurations jeopardizes compliance with the regulations set forth in M.A.501, since Part-145 personnel (ref. AMC M.A.305(b)) has no other options but to rely on reference to the (S)TCH’s parts catalogue in this case. The A350 AIPD has no installation restrictions on the partnumber in question, and the additional SB placard proposed by Airbus does also not create any effective information in the maintenance data (AIPD, MP) about AD restricted installation configurations. Referring to an SB (as suggested by AMC M.A.305(b)) would work for Part-145 staff for the modification as per SB A350-52-P015, but not thereafter for an active control of the Removable Structural Component’s AD compliance, for the reasons explained above.

EASA response:

Comment noted. Already in the past, Airbus re-identified doors modified in-service using a modified P/N, usually by changing the suffix from (e.g.) 00 to 95, or by labels / plates showing the MOD number(s) or SB number(s). We agree this is not the best method. Nevertheless it is considered to be compliant with Part 21, Subpart Q. See also EASA answers to Comments #2 and #3 above.

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

