

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-074

[Published on 25 April 2019 and officially closed for comments on 09 May 2019]

Commenter 1: Mahan Air – Aydin Taghinejad – 29/04/2019

Comment # 1

In according to SB A340-57-4124 R03 required inspection for CWB above area is only applicable to A/Cs on which MOD 55306 and MOD 55792 are not embodied (same effectivity as AD 2014-0149), but in AD 2017-0069 the applicability of this inspection (CWB above area) was changed to PRE MOD 55306. After issue of AD 2018-0249 the applicability of CWB above area inspection (which is related to SB A340-57-4124 R03) is changed to PRE MOD 55306 and POST MOD 44360 which cause applicability of several A/Cs in our A340-300 fleet are changed to Not Applicable due to not embodiment of MOD 44360 on these A/Cs.

As we review PAD 19-074, this change still exist with no reason described. Could you please clarify this problem for us if there is not any mistake in issuance of this AD regarding to applicability of SB A340-57-4124 R03.

EASA response:

Comments partially agreed.

The compliance times for each aeroplane configuration are specified in the applicable Inspection SB (see paragraph 1 of the Final AD). Table 1 of the Final AD only provides grace periods for certain aeroplanes. Other aeroplane configurations may have no grace period but are still affected.

In addition, after clarifications with Airbus, it is confirmed that aeroplanes in pre-mod 44360 configuration are affected by the inspection requirements of the Final AD, except those on which the optional terminating action is embodied. This aspect has not changed in the revised AD, compared to original AD 2018-0249.

A Note has been added to the Final AD to clarify that Table 1 of the AD only provides grace period for certain aeroplane configurations.



Commenter 2: Cathay Pacific Airways – Hyphen Choi – 09/05/2019**Comment # 2**

- A. This PAD is related to number of SB's which will create much documentation works upon the AD is issued. CPA would like EASA to consider to have the AD effective date to be at least 30 days after the AD issuance date, so that to allow us to have adequate time to setup the AD compliance requirements, especially it is already protected by the compliance of previous AD 2018-0249.
- B. To avoid confusion, CPA suggests to introduce a Applicable SB column in Table 1 (like previous AD 2014-0149 Table 2), to explicitly correlate the affected aeroplane with the corresponding SB.

EASA response:

- A. Comment agreed. Given the complexity of the AD, the Final AD becomes effective 30 days after its issue date.**
- B. Comment not agreed. The Final AD is a revision of EASA AD 2019-249, so heavy changes of the Table is not preferred and it is considered that, on that aspect, it is clear enough. No changes have been made to the Final AD in response to this comment.**

