



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-127R1

[Published on 26 September 2018 and officially closed for comments on 11 October 2018]

Commenter 1: Cathay Pacific Airways Limited – Hyphen Choi – 09/10/2018

Comment # 1

- A. CPA strongly recommends to indicate the “Applicable Airbus SB” in Table 1 for clarity, like AD 2014-0149 Table 2. CPA consider SB 57-3114 is applicable to A330 (pre-mod 44360), except A330-200F; SB 57-3116 is applicable to A330 (post-mod 44360), except A330-200F; and SB 57-3115 is applicable to A330 (post-mod 44360 and pre-mod 55306), except A330-200F.
- B. The AD language is tedious long which should be improved, it is easily to induce confusion. Like Para 1 aims to talk about “Threshold” and “Interval” only, while the requirements linked to so many conditions, however the entire Para 1 has only one “full stop”, I was breathless reading this para together with Para 2 & 3. It is suggested to deliver the requirements (Para 1 – 3) with bullet points or tabulated.
- C. Para 4, 5 and 6 specify corrective actions only to SDI inspection from the SB’s quoted in Para 1, however, these SB’s have SDI and Rototest Inspections mentioned separately in the SB instructions. It is confused if EASA only focuses on the SDI inspection finding. CPA believes rototest finding should be taken into account as well.
- D. Para 6 is confusing which side for which action. Please specify “repaired side” and “non-repaired side” like AD 2017-0069 Para 3 well presented.
- E. To avoid confusion, Para 9 please specify the “Applicable Airbus SB” for post-mod 55306 and pre-mod 55792 a/c, and post-mod 55792 and pre-mod 205225 a/c. CPA consider applicable modification SB of A330-300 in Table 2 is SB 57-3129 learning from AD 2017-0069 Para 5 presentation.
- F. The accomplishment of the optional mod per Para 12 and 13 only terminates the SDI inspection of the applicable inspection SB’s. How about the rototest inspection in the applicable inspection SB’s? Can the rototest inspection be terminated as well?
- G. 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 45 days after the AD issuance date, so that to allow us to have adequate time to setup the AD compliance requirements, especially the compliance of the previous issued AD 2017-0069 is providing certain protection for the a/c operating safely.

EASA response:

A. Comment not agreed. Operators should have easy access to Airbus SBs, allowing them to determine which SB is applicable to each aeroplane type/model, MSN and configuration. In case of difficulties with that standard process, Airbus can be contacted.



- B. Comment partially agreed.** *There is a process in place that may lead to simplification of ADs, but whether this may lead to shorter sentences is too early to say. It should be noted that, since ADs have strong legal value (required to be accomplished through regulation), the wording must leave no margin for error or interpretation. Nevertheless, §(1) of the Final AD has been simplified, improving readability.*
- C. Comment agreed.** *The Reason section of the Final AD has been amended to emphasise that, where the AD refers to SDI, that includes rototest.*
- D. Comment not agreed.** *Paragraph (6) allows the mod (partial at aircraft level) to be accomplish on “the opposite side, provided no RDAS was found to exist, as specified in the applicable Inspection SB, on that side”. This already makes clear that the side on which the mod is allowed must be non-repaired (no RDAS as specified in the SB). Any other repair (Airbus RDAS or otherwise) that may exists on that side is not relevant for the purpose of this AD. In EASA view, the wording is not open to interpretation.*
- E. Comment not agreed.** *See EASA answer to point A. above.*
- F. Comment noted.** *The rototest, being part of the SDI instructions, can be terminated as well. Paragraphs (12) and (13) of the Final AD have been amended accordingly. See also EASA answer to point C. above.*
- G. Comment agreed.** *The latest SBs were released between September 2017 and May 2018. The PAD, announcing the intent to require the instructions of those SBs, was issued 13 September 2018. EASA considers that sufficient time has already been available to operators to start the review and planning process.*

No changes have been made to the Final AD in response to points A, D, E and G of this comment.

Commenter 2: Lufthansa Technik AG – Benedikt Brück – 10/10/2018

Comment # 2

- A.** LHT has received the newest PAD 18-127R1 in regards to the beloved FR40 inspection and modification for A330 and A340 aircraft. The FR 40 cracking issues accompany these aircraft types since a decade, and we clearly understand that due to the design of this critical junction the matters are complicate and complex. For such difficult and comprehensive Service Bulletins which interact to each other it is essential to have a distinct advise which does not have room for misinterpretation from the authority as well as the manufacturer and operators. The key is to have a clear and easily to understand Airworthiness Directive which does not introduced additional agitation to the complete process. For the PAD 18-127R1 we clearly can see that the spirit of improvement is somehow missing. Please consider that the up-date of relevant work instructions and coordination of the measures for implementation of a new EASA AD Note reference in a running program is complicated and very time consuming. The impact on the documentation is massive and extensive. For this reason Airbus and EASA have to consider that a revision of an AD Note document respectively new creation of the Airworthiness Directive should also have some benefit for the operator. The operator understand that it is necessary that



mistakes and errors have to be eliminated and corrected as well as the growing aircraft fleet including the freighters have to be respected. But sometimes it is appropriate to scale big things to small pieces which are then easier to digest.

- B. At the current stage many A330/A340 operators are forced to fulfil the initial inspection requirements of the EASA AD 2017-0069 and have or will carry out inspections on the FR 40 until 23. November 2018. In the last quarter we have recognized that many crack findings are in the hole position 260. This specific position is treated with a double cold working procedure. For the operators there is the question if the inspection respectively modification program is applicable and effective after the finding currently noted? Since Airbus normally gets all inputs from the operators and is responsible for the creation of the Repair Design Approval Sheets, Airbus should be in the position to analyse the outcome of these inspections which are carried out until end of this year. Therefore it is highly appreciated to have a feedback in regards to current inspection status.
- C. Furthermore the new PAD takes over existing requirements from EASA AD 2014-0149 and EASA AD 2017-0069 and the calendar time limits of these AD notes for the thresholds are already reached. (For example the compliance limit of A330 (Pre-mod 44360) is defined with 2400 FC or 24 months after 27.June 2014, whichever occurs first, and this limit is in the past). Is it possible for Airbus and EASA to determine which requirements of the published AD notes have to be maintained in the future?
- D. Table 2 refers to the window of embodiment of the CWB modification and is linked to the applicable modification, SB A330-57-3129 and SB A340-57-4123 are available in Rev 00 and 01, and it is possible that an operator had carried out the modification at revision 00. For this case is no specific requirement respected.
- E. Paragraph (3) of previous AD 2017-0069 states that, “if, during any inspection of a post-mod 44360 aeroplane, as required by paragraph (1) of this AD, a crack is detected only on the LH or RH side, as previously repaired by an Airbus RDAS, it is acceptable to partially apply the applicable Optional Modification SB (optional terminating action – see Note 2 and paragraph (8) of this AD), on the non-repaired side.” To our understanding this implies that if you have a repaired hole on one side of the aircraft it is not acceptable to apply the optional terminating modification on that side (LH or RH side of the aircraft). Contrary to this interpretation, after repairing a hole, Airbus has repeatedly advised for applying the optional terminating modification on the non-repaired holes on the same side as the repair. Even stating that SB A340-57-4137 could be applied on an already repaired Hole #260 resulting in a termination of the mandatory inspections. LHT has contacted EASA and Airbus multiple times to clarify this issue. EASA advised us to wait for this PAD and Airbus explained that it is acceptable to perform the modifications if they have been contacted and agreed to the application, which to our understanding does not comply with the AD. Sadly, PAD 18-127 does not clarify this issue as promised. In fact it seems that paragraph (6) and (13) of PAD 18-127 are emphasizing that application of the optional terminating mods is not allowed on a side with a repaired hole. From a technical point of view LHT concurs with Airbus that a partial application of the optional terminating modification should be possible on non-repaired holes even when a repair exists on the same side, given the right circumstances. But to our understanding this does not comply with the AD, if the current wording stays as is. Therefore LHT asks to change paragraphs (6) of PAD 18-127 to include a passage stating that, if you have a crack or RDAS on a side, you have to contact Airbus for approval of the modification on that side and on paragraph (13) that a partial application will terminate the mandatory inspections on the modified holes.



- F. Additionally in Table 1 the applicable Aeroplane configuration for the “above” CWB area inspection is defined as “A330 and A340 (post-mod 44360 and pre-mod 55306), except A330-200F” does this mean that the inspection is only applicable for an aircraft that is both post-mod 44360 and pre-mod 55306 or is it applicable for all aircrafts that are either post-mod 44360 and/or pre-mod 55306? Please clarify your intention in the AD wording.

For above mentioned reasons Airbus and EASA are asked to review the complete document again and to clarify the open questions and proposed changes from the operators.

EASA response:

A. Comment noted.

B. Comment noted. Airbus can be contacted for information on reported findings and modification/repair results and effectiveness.

C. Comment noted. There is no method to establish whether all actions, for which compliance times have expired, have indeed been accomplished on-time and on all affected aeroplanes world-wide. For this reason, previous requirements are retained (re-stated) to ensure that, in case of not-yet-accomplished, the authority of an affected aircraft knows which action(s) still need to be enforced before release to service, or C-of-A renewal.

D. Comment agreed. A ‘Credit’ paragraph (10) was inserted to clarify the condition under which the original issue of the applicable modification SB is acceptable.

E. Comment not agreed. The understanding of the commenter does not match the facts as provided by Airbus to EASA. Nevertheless, in case an RDAS is found to exist on an aeroplane on a side where the optional mod is intended, the operator (or Airbus on their behalf) can apply to EASA for an AMOC approval, providing mitigating actions (e.g. inspections, additional modification actions) that would allow that action.

F. Comment not agreed. Where the AD states “post-mod 44360 and pre-mod 55306”, this means exactly what is stated: this action is for aeroplanes that are in post-mod 44360 and pre-mod 55306 configuration. This means that (e.g.) the action is not valid for aeroplanes that are in post-mod 44360 and post-mod 55306 configuration; in EASA view, this is not open to interpretation.

No changes have been made to the Final AD in response to points A, B, C, E and F of this comment.

