



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-133

[Published on 01 October 2018 and officially closed for comments on 29 October 2018]

Commenter 1: Ethiopian Airlines – Yonas Fantahun – 02/10/2018

Comment # 1

As we all know the A350 fleets are a very young fleet, even with respect to B787. Aircraft OEMs shall give due attention on their process of airworthiness approval well before flight testing of the aircraft. I am observing too much to the extent of safety related aircraft systems such as fire detection and/or extinguishing system, flight control systems and so on. For instance, there are AOTs and/or SBs that are released due lack attention during process of assembly and release to service such as:

1. Per Airbus Alert Operators Transmission (AOT) A26P004-18 original issue, which tries to address one of the unsafe condition, after engine installation, protective caps were found still in place on fire extinguishing lines at engine zone 1 and zone 3. This is a highly safety related issue, in case of engine fire and its consequence on the aircraft.
 2. Per Airbus Alert Operators Transmission (AOT) A57P011-18 Rev 00 on progress to be released, requires to inspect/check the gap and apply sealant. The funny part of this AOT is that it requires 45 hrs aircraft ground time and look to what extent it creates maintenance burden to operators and/or airlines.
 3. SB A350-27-P022 REV 00 Jun 06/18, requires to inspect whether or not the existence of untorqued nuts at the slat and flap shaft junction. Depending on our inspection findings, torqueing the affected nut(s) or remove and reinstall the shaft. Because this SB is going to be the reference document for the subject PAD, here are my comments specific to this SB:
 - A) Here it requires to inspect the area within six(6) months and if there is a finding, no further flight. Look the burden it creates on airlines such as maintenance burden and may result surprise AOG, flight cancellations, especially for scheduled operators like my airline, Ethiopian.
 - B) The parts are not arranged for operators in advance before performing the inspection, this will minimize surprise AOG situations. Here it shall be clearly specified free of charge delivery, because this is Airbus final assembly line process gap.
 - C) Due to the above mentioned reasons, the compliance time of 3 months after the effective date of the AD is too small.
-The due date of the SB shall be increased, as you know Ethiopian is scheduled operator, it will be tough to ground the aircraft, but you document forces us to do so. Better to correct such concerns before releasing your mandatory document(EASA AD)



As a regulatory body we obey and fully guided per your policies and procedures, but your boundary and/or level of control shall equivalently cover aircraft manufacturers and/or part OEMs. The cumulative effect such defects by aircraft and/or part manufacturers, on their assembly and testing process gap, affects fully operators, by creating maintenance burden and finally resulting an increase in our total maintenance cost.

EASA response:

A. Comment not agreed. No further flight is allowed only after a very specific finding has been made i.e. if more than one bolt is missing or more than one nut is untorqued. Numerous findings in this condition are not expected and if there is one, Airbus should have shipped a spare Torque-Shaft Assembly in advance thus minimizing the ground time, as described in the Retrofit Information Letter (RIL Reference: V27M18001981 R00 dated 15-JUNE-2018) dispatched to concerned operators.

B. Comment noted, the subject is not related to this AD: Airbus informed EASA about: Commercial conditions are expressed in Airbus SB A350-27-P022. Labour & Material are free of charge.

C. Comment not agreed: The compliance time has been determined considering a maximum acceptable risk time during which a potential unsafe condition may develop.

No changes have been made to the Final AD in response to these comments.

Commenter 2: Cathay Pacific Airways Limited – Dicky Or – 05/10/2018

Comment # 2

The AD requires to accomplish a DET in accordance with SB A350-27-P022, but we found a typo in SB page 69 where Slat Torque-Shaft Assembly 4 RH is mistyped as LH, Airbus acknowledged this error. We request the AD to specify this mistake or Airbus has to publish SB revision before the AD effective date.

EASA response: Comment noted. Airbus Customer Support informed EASA that this typo (written LH instead of RH on a subtask dedicated to replacement) is considered as minor and usually no SB revision is raised for this purpose.

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

