



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-148

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Commenter 1: UPS Airlines – Brad Walker – 14/11/2018

Comment # 1

Since EASA AD20 16-0 172 was issued, Airbus SB A300-24-61 03, Revision 05, was issued to include two sets of additional work instructions which were not clearly defined in Revision 04. EASA is proposing a new Airworthiness Directive (AD), PAD 18-148, to supersede existing EASA AD 2016-0172, dated 09/06/2016, which is against Airbus A300 aircraft wing wiring installations that have been modified by previous revisions of Airbus Service Bulletin (SB) A300-2400-61 03.

Airbus SB A300-24-61 03, Revision 04, has been incorporated on all fifty-two (52) UPS A300F4-622R aircraft. No other revisions of the service bulletin have been accomplished on the effective aircraft.

Airbus SB A300-24-6103, Revision 05, states "No additional work is required for aircraft which have embodied this Service Bulletin for the first time at Revision No. 4." Additionally, the separate Tasks identified with "ADDITIONAL WORK" within the Service Bulletin are not effective to aircraft which have embodied this Service Bulletin for the first time at Revision No.4. Therefore, UPS has taken no additional action at this time.

As written, UPS A300F4-622R aircraft corresponding to Configuration 3 as defined in the applicable SB fall under Group 3 of AD 18-148. UPS requests EASA to clarify the "Additional Work" section of PAD 18-148 "For Group 3" to reflect Airbus SB A300-24-61 03, Revision 05, "No additional work is required for aircraft which have embodied this Service Bulletin for the first time at Revision No.4."

EASA response: Partially agreed.

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

EASA concurs with the no additional action for the UPS A300-600 A/C based on the above information that the ISB A300-24-6103 has been implemented on these A/C for the first time at Revision 04.

However, EASA disagrees with UPS proposal to include the sentence "No additional work is required for aircraft which have embodied this Service Bulletin for the first time at Revision No.4." as this sentence is already covered in the PAD 18-148 by credit (5) Modification of a Group 1 or Group 3 aeroplane, accomplished before the effective date of this AD in accordance with the instructions of Airbus SB A300-24-6103 at Revision 04 and on which Airbus SB A300-24-6103 Revision 03 was not embodied, is acceptable to comply with the requirements of paragraph (1) of this AD for that aeroplane and is covered also by the credit (2) for A/C in conf 2.



