

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-187

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**Commenter 1: Delta Air Lines – Kimberly Davis, Tristan Perry – 24/12/2018**

### Comment # 1

#### REFERENCES:

/A/ PAD No. 18-187, issued 21-December-2018

/B/ Service Bulletin (S/B) A350-53-P007, dated 15-Nov-2018.

#### SUMMARY:

In Reference /A/ and /B/ Airbus and EASA propose inspections for and replacement of bad struts, as identified by P/N. Delta concurs with the proposed Proposal to issue an Airworthiness Directives (PAD). In support of this PAD, Delta would like to provide the following comments.

While Delta Air Lines does not technically operate under EASA rules, we see several benefits in participating in EASA rulemaking process. For Airbus Service Bulletins, the EASA PAD and AD language often becomes the framework for the FAA NPRM and AD. Also, the industry hoped for improvement are increased with greater participation in the coordination and review process.

#### DELTA'S COMMENTS:

The "Applicability" paragraph can create burdens to prove our compliance depending on exact wording. The current Applicability statement in EASA PAD 18-187 basically states "All 350 A/C". However, no Delta A/C are listed in the SB. The proposed "All A/C" Applicability paragraph places us in a position to write documents to prove that our A/C are not affected. In this example, a slight change in wording can have a big impact. For example, EASA AD wording such as "This AD applies to Airbus A350 aircraft as identified in S/B A350-53-P007" or "this AD applies to Airbus A350 aircraft without mod 108588 embodied" now defines only the applicable AC, and we are no longer burdened to author paperwork to show compliance for our fleet.

As further support, our A350 IPC does not list any of the "affected" (bad) P/Ns and only lists the noted "serviceable" (good) struts. Therefore we have no risk that we might install the "bad" struts. Also, the diagonal struts are not listed in the A350 RSC list, OIT 999.0058/16, indicating that the industry does not see them as swappable.

Therefore, Delta proposes that the applicability paragraph be reworded to something like "This AD applies to Airbus A350 aircraft as identified in S/B A350-53-P007" or "this AD applies to Airbus A350 aircraft without mod 108588 embodied". Either options now define only the applicable AC, and we



are no longer burdened to author paperwork to show compliance for our fleet. Since the IPC does not list the “bad” parts, we have no chance of installing the bad parts.

***EASA response:***

***Comment agreed. Based on the fact that the affected P/N is not part of the design definition of post-mod 108588 aeroplanes (i.e. not listed in the IPC as interchangeable with pre-mod parts), to allow installation of an affected part on any of those aeroplanes would require a modification approval and an SB – which would not be acceptable for EASA. Any other installation would be an illegal act, which are not to be addressed by AD action.***

***Consequently, the Final AD has been amended to exclude those aeroplanes from the Applicability. In addition, the Group definitions have been removed from the Final AD and paragraph (2) has been amended accordingly.***

