

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-063

[Published on 04 May 2021 and officially closed for comments on 18 May 2021]

Commenter 1: Singapore Airlines – Douglas Ho – 05/05/2021

Comment # 1

I would like to clarify the repeat inspection requirement for PAD 21-063 that is applicable to the A330-343 aircraft.

With regards to paragraph (1) and Table 2 of the PAD, if an affected part has performed Airbus SB A330 -55-3032, the initial inspection will have to be performed before exceeding 144 months since first flight of an affected part on an aeroplane, or within 24 months after 15 December 2009 [the effective date of EASA AD 2009-0255], whichever occurs later. Thereafter, the repeat DET inspection is to be performed at intervals not to exceed 72 months from the date of the elevator first flight after the last inspection.

If the initial inspection is performed at 100 months since first flight of an affected part, am I correct to say that the next inspection should be performed within 172 months from affected part first flight?

EASA response:

Comment noted. EASA confirms that, if the DET at 100 months since first flight was recorded as compliance with AD 2019-0138 (or previously, to AD 2009-0255), the next DET would be due within 72 months after that.

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

Commenter 2: Deutsche Lufthansa AG – Jann Rauschenberger – 05/05/2021

Comment # 2

A. Paragraph (1): The revised sentence implements that an aircraft which has been inspected and immediately stored e.g. for 24 month, the repetitive interval of 72 months starts when the elevator/ aircraft has its first flight. In this case, 96 months after last inspection is that correct? From a technical viewpoint, the elevator can also suffer damage due to ingress of water from freezing conditions, rain and so on. Therefore, the revision of

this sentence is not comprehensible. If this sentence is meant for storage of the inspected elevator only, than it should be more precise. For example:

(1) Within the compliance time specified in Table 2 of this AD, as applicable, and, thereafter, at intervals not to exceed 72 months from the date after the last inspection, accomplish a DET of each affected part in accordance with the instructions of the SB. If the inspected elevator is to be stored on shelf, the repetitive inspection interval should be counted from day of installation on an aircraft.

- B. Due to your intention of updating this airworthiness directive, we would like to use the opportunity to improve the reporting requirement mentioned in paragraph (8).

Reporting to Airbus is required since the first issue of this inspection program on the elevators in 2004. For data collection, the timeframe from 2004 up to 2021 should be sufficient to gain data about the behaviour of the elevators. For this reason, we do not see the requirement of the reporting to be compliant with the airworthiness directive any longer and ask EASA to improve this paragraph. As a minimum, the timeframe should be relaxed from 30 days to 90 days. Please consider that Airbus will be notified about most findings anyway, due to a very limited repair possibility given in the SRM and the repair requirements listed in the SB.

EASA response:

- A. Comment noted. EASA agree with the interpretation of the commenter. However, the intent of this AD revision is to retrieve the compliance time wording as it was in previous AD 2009-0255. For this reason and as the sentence is clear enough, no changes have been made to EASA AD 2019-0138R1 in response to this comment.**
- B. Comment partially agreed. While reporting is still deemed required, it is agreed to extend the compliance time as proposed.**

Commenter 3: Delta Air Lines – James Thompson – 18/05/2021

Comment # 3

Reference:

- (A) Airbus Service Bulletin (SB) A330-55-3039, dated 07 Aug 2009
- (B) Airbus Service Bulletin (SB) SB A340-55-4035, dated 07 Aug 2009
- (C) EASA Airworthiness Direction (AD) 2019-0255, dated 01 Dec 2009
- (D) Airbus Service Bulletin (SB) A330-55-3039 Revision 01, dated 15 Feb 2019



(E) Airbus Service Bulletin (SB) SB A340-55-4035 Revision 01, dated 15 Feb 2019

(F) EASA Airworthiness Direction (AD) 2019-0138, dated 12 June 2019

(G) EASA Proposed Airworthiness Directive: PAD No. 21-063, dated 04 May 2021

(H) Airbus Service Bulletin (SB) A330-55-3039 Revision 02, dated 13 Apr 2021

SUMMARY:

Historically, there have been reports of disbonding on A330/340 elevators which prompted an investigation. After analysis, it was identified the disbonding was a result of water ingress. If not detected and corrected, this condition could affect the structural integrity of an elevator, possibly resulting in reduce control of the aeroplane. To address this unsafe condition, a DGAC France Airworthiness Directive was issued requiring repetitive inspection of elevators. After continued reports of water ingress, a new investigation was performed and determined that a new inspection program of the elevators was necessary. As a result, Airbus issued Ref (A) and (B), and EASA issued Ref (C) addressing this. Later, it was also identified that elevators post-modification (mod) 56519, to incorporate A330 freighter aeroplanes needed to be addressed, thus, prompting Ref (D), Ref (E), and EASA Ref (F) in response. Since the issuance of Ref (F), it was identified that the AD Compliance Times did not align with the SB Compliance Times. Ref (G) has been issued to amend/correct the paragraph (1) inspection interval for the repetitive DET to re-align with the interval previously defined prior to Ref (F) prompting Ref (G).

DELTA'S COMMENTS:

After review of Ref (G), it was identified that it still references Ref (D) within the SB listing within the Definitions. Airbus has issued Ref (H) which incorporated Airbus Technical Adaptations (TA), and updated accomplishment instructions. Due to the recent issuance of Ref (H), DAL requests within the Ref (G) Definitions and The SB listing that Ref (H) is referenced in lieu of Ref (D). DAL notes that it is observed that Ref (G) contains verbiage approving use of later approved revisions for compliance with the requirements of the AD, however, denoting the latest SB revision will highlight there is a later revision available.

EASA response:

Comment agreed. The reference to Airbus SB A330-55-3039 Revision 02 was added in EASA AD 2019-0138R1 in response to this comment.

