

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-034

[Published on 07 March 2019 and officially closed for comments on 04 April 2019]

Commenter 1: Lufthansa Technik AG – Walter Press – 01/04/2019

Comment # 1

Please find below comments in regards to announced Airworthiness directive for the thermographic inspection on A330/A340.

- A. Operators may have made this comment to a few Airworthiness Directives but somehow the Authorities and Airbus does not consider practical aspects from the airlines. The most operator maintenance programs are counted from the day of aircraft delivery and hand over of the certificate of acceptance. For the operators it is not evident at which date Airbus installs an elevator during the aircraft production and therefore the compliance time of 144 months since first installation of an affected part of the airplane is not recommended. Even the first flight date as start point is not very helpful because the first flight of an aircraft and the delivery to the customers are not necessarily the same. In some case we have noticed up to two months between these both dates.

For this reason EASA and Airbus are kindly asked to reconsider the start date of this Airworthiness Directive and to formulate a better wording, which allows an accomplishment of the elevator inspection during the scheduled heavy maintenance visits as defined in the MRB and MPD without the need to ask for special compliance times per AMOC/ASAC.

- B. For the effectivity LHT had noticed that the elevators with certain part numbers are affected and that elevator part-numbers F55280002003 and F55280002003 are excluded. These elevators are installed on A330 aircraft as well as on A330-900 aircraft. However it seems to us that the elevators are interchangeable and that it could be technically possible to fit an affected elevator on A330-900 also. For this reason EASA is kindly asked to check the applicability of the AD which may needs to be adapted to A330-900.

EASA response:

- A. **Comment partially agreed. In the Final AD, the reference date for the first inspection has been amended to make it similar (same intent) as in EASA AD 2009-0255, which is in place for years and should be understood by operators. Regarding aeroplane first flight, that is the appropriate reference point for parts installed on the production line; this date is well known to operators and available in Airbus system.**
- B. **Comment not agreed. The affected parts (elevators with P/N as specified in the final AD) were not installed by Airbus on the A330-941 production line as these parts are not part of the type design definition of these aeroplanes. Only elevators with different P/Ns (F552-80002-002 and -003)**



are eligible for installation. In principle, for the same reasons, no operators would have installed an affected part on an A330-941 aeroplanes. No approved instructions exist to do that. No changes have been made to the final AD in response to this comment.

Commenter 2: Delta Air Lines – Haley Erickson – 03/04/2019

Comment # 2

Reference:

- (1) Docket No. PAD-19-034; ATA 55 – Stabilizers – Elevators – Inspection
- (2) EASA Airworthiness Directive (AD) 2009-0255: ATA 55 – Stabilizers – Elevators – Inspection
- (3) SB A330-55-3032 Rev 1
- (4) SB A340-55-4029 Rev 1

SUMMARY:

Reference (1) proposes to adopt a new airworthiness directive (AD) for Airbus A330 and A340 aircraft. This proposal supersedes Reference (2) to clarify the difference between aeroplanes fitted with elevators post Airbus modification (mod) 56519. Both the proposed Reference (1) and existing Reference (2) inspect for liquid ingress damage on the elevator and implement corrective actions as a proactive means of preventing elevator skin panel disbonding on A330 and A340 series aircraft. Delta has reviewed the proposed rule and concurs with the intent of the proposal.

DELTA'S COMMENTS

- A. Reference (1) Table 2, identifies the compliance time for aeroplane condition - affected part(s) not inspected per Ref (3) or Ref (4), as applicable, which utilizes the identical numerical threshold (e.g. 144 mo) for compliance as given in the superseded Reference (2). However, the wording has been changed from “since the date of elevator’s first flight” (previously in Ref (2)) to “since first installation of an affected part” (in Ref (1)) which lends to confusion. For example, during production (Final Assy Line at Airbus) an elevator is installed on an aircraft prior to service (= first installation) but the aircraft does not induct into service until one month later (=first flight), the first installation and first flight dates do not match. DAL requests review and clarification of the intent and revise wording if/as necessary.
- B. Reference (1) Table 2 provides two different options for determining compliance time (based on whichever scenario occurs later), the first of which is based on installation date of the elevator and the second of which is considered a “grace period” based off the reference date, 15-DEC-2009. In the case where an operator purchases an A330 elevator from the surplus market and cannot determine the “first installation” date (the EASA Form 1 or the records only includes total Flight Hours/Flight Cycles), the operator would legally not be able to take compliance (since 24 months after 15-



DEC-2009 = 15-Dec-2011). This is a date that occurs in the past and, therefore, cannot be used to claim compliance. DAL requests review and clarification for operators on how to comply with this Ref (2).

EASA response:

A. Comment partially agreed. See EASA answer to point A of Comment #1 above.

B. Comment agreed. For a used affected part bought 2nd hand, if the number of months since first flight cannot be determined, inspect the part prior to installation on an aeroplane. The Final AD has been amended in response to this comment by inserting a new paragraph (6), later paragraphs re-numbered accordingly.

Commenter 3: Cathay Pacific Airways Limited – Hyphen Choi – 04/04/2019

Comment # 3

To comply with PAD 19-034, CPA needs to know clearly the elevator configuration of the SB A330-55-3039 Rev 01 in order to perform the inspection. However, the configuration definition of the SB A330-55-3039 Rev 01 is based on the followings:

- A/C MSN that the elevator initially installed on a/c delivery
- Effectivity of SB A330-55-3032, depending on a/c MSN, that the elevator installed initially
- Mod 56519 status, against a/c MSN

CPA has some second hand elevators installed on our a/c, while we have no idea these elevators initially installed on which a/c MSN.

SB A330-55-3039 Rev 01 is the elevator inspection, but the SB configuration is based on a/c MSN without considering the elevator is an RSC item. The SB configuration definition is not clearly defining the elevator Config, which will lead to the operation cannot comply or mis-comply the AD.

CPA suggests EASA to postpone issuing the AD, not before Airbus well defining the elevator configuration in the next SB revision.

EASA response:

Comment not agreed. In case of an elevator for which the date when the part made its first flight on an aeroplane is unknown, it is advised to contact Airbus to assist in determining that date. See also EASA answer to point A of Comment #1 above. The comment on SB related to MSN is understood; this is why the AD (unlike the SB) applies to 'all MSN'. The SB contains adequate instructions, if an affected part is installed, to comply with the AD requirements, even if the aeroplane MSN is not listed in the SB.



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

Commenter 4: Lufthansa Technik AG – John Donegan – 04/04/2019

Comment # 4

Following on from LHT comments previously submitted for the Proposed AD 19-034, operators kindly request that the final AD use the same terms as used on the official certification papers and delivery documentation by the OEM (Airbus), for the basis of such compliance limits, e.g. "Date of First Flight or Date of Manufacture", if the date of original transfer or title of Certificate of Airworthiness for Export cannot be used. This will remove any ambiguity. Airbus has previously not been able to provide additional support to operators to determine dates of specific stages of the manufacturing or installation processes or part numbers, when not part of standard recording in the delivery documentation of an aircraft.

We note, however, that the "Date of Manufacture" stated in the Airbus Delivery Documents is always some time after the first flight!



Example:

AIRCRAFT INSPECTION REPORT APPROVED ON :	20 November 2017
DATE OF FIRST FLIGHT :	01 September 2017
DATE OF MANUFACTURE : (According to ICAO Annex 16)	20 November 2017
PLACE OF MANUFACTURE :	TOULOUSE (FRANCE)

FORM 52

NUMBER :	T 7465
DATE :	20 November 2017

OTA : It is the responsibility of the A/C operator to maintain up-to-date these A/C records in

accordance with A/C registration Authority requirements.

Established at : TOULOUSE

Signature and stamp of issuing Authority :

J. PETIT

Production Approval

Number EASA.21G.0001

**EASA response:**

Comment partially agreed. First flight (after installation, or after last inspection) of an affected part was finally chosen for the initial compliance time, as it was in previous AD 2009-0255. See also EASA answer to point A of Comment #1 above.

