

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-035

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

Commenter 1: American Airlines – Blaklee Burgess – 03/04/2019

Comment # 1

After review of PAD 19-035, American Airlines would like to request the released AD address the relationship of previously issued FAA AD 2016-03-07 (EASA AD 2015-0119). Please clarify what additional requirements are necessary if a carrier has already complied with previous FAA AD 2016-03-07 (EASA AD 2015-0119).

EASA response:

Comment acknowledged. EASA AD 2015-0119 was published to manage the same unsafe condition for A330 aeroplanes, other than A330-941 aeroplanes. This new Final AD is applicable to A330-941 aeroplanes only. The 2 Final ADs will exist in parallel, with different Applicability.

Because of the different Applicability, an aeroplane that is compliant to EASA AD 2015-0119 does not need to comply with this new Final AD.

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

Commenter 2: Delta Air Lines – Cliff L Brown – 04/04/2019

Comment # 2

Reference: (A) EASA PAD 19-035

SUMMARY:

Ref (A) states that reports have been received indicating premature ageing of Collins Aerospace (formerly B/E Aerospace) chemical oxygen generators, having part number (P/N) 117042-XX, where XX represents any numerical value. This condition, if not corrected, could lead to failure of the generator to activate and consequently not deliver oxygen during an emergency, possibly resulting in injury to airplane occupants. Reference (A) is requiring that all of the listed oxygen generators be removed from service before the part exceeds ten (10) years since its date of manufacture.



DELTA'S COMMENTS

Upon reviewing Ref (A) Delta Air Lines is submitting the following comments:

- A. The listed effectivity of the proposed AD is all manufacturer serial numbers of the Airbus A330-941 fleet. The oxygen generators with (P/N) 117042-XX are also used on the A330-200 and -300 fleets. These aircraft should be experiencing the same conditions as the A300-941 fleet and should be included in the proposed AD. This inclusion will simplify with planning for removal of units since all 117042-XX units will have the same time limit.
- B. The proposed AD can be simplified to just one step: Incorporate Airbus A330 MRBR Task 35.20.01/05 Revision 17 dated August 2018 or later approved version. This revision delineates the 10yr limit for the generators in section 35.20.01/05. This would be incorporated into the operators maintenance program and satisfy the requirements of the proposed AD. This would be similar to ADs related to ALS.

EASA response:

A. Comment acknowledged. It is confirmed that the same unsafe condition, related to chemical oxygen generators, exists on other A330 aeroplanes. EASA published AD 2015-0119 to manage the situation for these planes. See also EASA answer to Comment #1 above.

B. Comment not agreed.

The ALS tasks are mandatory tasks, and ALS new revisions are mandated by ADs when incorporating more stringent tasks than the former revision. No similar approach is followed for MRBR revisions. MRBR tasks are recommended tasks unless mandated by a dedicated AD like in this case. Incorporation of the MRBR task into the operator AMP may not be equivalent to compliance with an AD, since the task threshold/interval could conceivably be escalated when in the AMP.

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

