

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-039

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Commenter 1: Delta Air Lines – Tara Jain – 10/04/2019

Comment # 1

Reference:

- (1) Airbus Maintenance Review Board Report (MRBR) task 52.10.00/09
- (2) Airbus Maintenance Review Board Report (MRBR) task 52.22.00/09
- (3) EASA AD 2010-0135, effective date 19July10
- (4) FAA AD 2011-09-06, effective date 05May11
- (5) Global AMoC ANM-116-14-125, dated 16Jan14
- (6) Airbus Aircraft Maintenance Manual (AMM) task 55-10-00-200-805
- (7) Airbus Aircraft Maintenance Manual (AMM) task 55-22-00-200-805

SUMMARY:

During testing of the escape slide deployment on the left-hand forward passenger/crew door on an A330 aeroplane, the girt bar attaching the escape slide to the fuselage was found not in the locked position and was found detached from the aeroplane. After an investigation, it was determined that the component of the slide release mechanism (slider) was in an unserviceable condition due to the spring function being corroded or missing. If not corrected or detected, this condition could result in the slide detaching from the door after being inflated, which, during an emergency, would impair the safe evacuation of occupants, which could result in personal injuries.

To address this unsafe condition, Airbus previously issued Ref (1) and Ref (2) as applicable to address this issue. However, due to the investigative findings it was determined that repetitive functional checks and lubrication of the door girt bar sliders were necessary. The repetitive inspection and corrective action are accomplished via the applicable tasks Ref (1) or Ref (2).

DELTA'S COMMENTS

After review of the proposed airworthiness directive, DAL has compiled the following comments for review:



- A. Upon reviewing the requirements of this EASA PAD 19-039 proposed ruling and the requirements of Ref (3), it was observed the subject matter of both documents align being that both are applicable to the functionality of the spring of the emergency exit door slider mechanism and lubrication of the door girt bar slider on A330 aeroplanes. In addition, it was noted Ref (3) para (4) also accepts accomplishment of Ref (1) and Ref (2). Due to the similar subject matter of Ref (3), DAL proposes Ref (3) be revised/superseded to add the A330-941s, and address the repetitive inspection and corrective actions via Ref (1) and Ref (2) in a new requirement Ref (3) paragraph.
- B. Following issuance of Ref (3), the FAA issued Ref (4) addressing the Ref (3) requirement for U.S. operators. Ref (5) was later issued, to Ref (4), approving use of Ref (6) and (7) for the accomplishment of the initial and repetitive functional check of the spring function of the emergency exit door slider mechanism and lubrication of the door girt bar slider on the applicable A330 A/C. During review of Ref (6) and (7), it was verified that these manuals are also applicable (based on operator) to the A330-941s. Therefore, based on there being a previous Global AMoC for use of these AMM tasks and the applicability to the A330-941s, DAL requests use of Ref (6) and (7) be incorporated as an approved method for inspection in addition to Ref (1) and (2).

EASA response:

A. Comment agreed. The PAD has been revised accordingly, retaining the requirements of AD 2010-0135, which will be superseded.

B. Comment agreed. The PAD has been revised accordingly.

