

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-187

[Published on 09 October 2019 and officially closed for comments on 06 November 2019]

Commenter 1: Qatar Airways – Vitto Paolo Sarceno – 23/10/2019

Comment # 1

We are presently reviewing PAD 19-187. We understand that in case of crack findings during inspection on the actuator clevis or actuator bracket, the applicable modification SB must be performed on the affected location, before next flight.

Therefore, to avoid confusion, we suggest to re-phrase Paragraph 2 of the PAD as follows:

If, during any inspection as required by paragraph (1) of this AD, any crack is found, before next flight, accomplish either of the following, whichever is applicable for the affected location(s):

- a) Accomplish the applicable corrective action(s) in accordance with the instructions of the applicable inspection SB, or;
- b) Accomplish the applicable modification in accordance with the instructions of the applicable modification SB.

EASA response:

Comment not agreed. The modification is an optional action and should not be confused (or combined in a single paragraph) with the required corrective action when finding cracks. Paragraphs (3) and (5) are deemed sufficiently clear to indicate what the options are.

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

Commenter 2: Air France – Matthieu Papin – 05/11/2019

Comment # 2

A. None of the listed modification SB's are applicable to AFR fleet yet. So full study of this dossier is not possible.



B. §(4) Terminating Action indicates that corrective actions per §(2) (accomplishment of corrective actions iaw instructions of the inspection SB's) do not constitute terminating action of the repetitive inspection. However, inspections SB's at Ribs locations (A380-57-8234, 57-8235, 57-8238, 57-8239, 57-8240, 57-8241, 57-8243, 57-8253, 57-8245, 57-8255, 57-8247, 57-8257, 57-8249, 57-8259, 57-8251, 57-8261) show 2 types of terminating actions:

- Application of the Modification SB or
- Replacement of all ribs per Airbus instructions.

This paragraph (4) should be corrected to consider the replacement of all ribs per Airbus instructions, as a terminating action of the repetitive inspection per §(1).

EASA response:

A. Comment noted. As this is unrelated to (the content of) this AD, the comment should be directed to Airbus. No changes have been made to the Final AD in response to this comment.

B. Comment partially agreed. Paragraph (6) has been added to the Final AD accordingly.

