

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-220

[Published on 20 December 2019 and officially closed for comments on 17 January 2020]

Commenter 1: British Airways – Russ Marshall – 02/01/2020

Comment # 1

British Airways Engineering would like to offer the following observations, concerns and recommendations regarding the mandating of this SB:

BA currently operates a fleet of 12 A380 a/c within the range of applicability of this PAD / SB. Approximate average utilisation figures for our fleet are 500FC per year and 10FH per cycle. We believe this to be longer flight times than the A380 worldwide average resulting in BA accommodating very short FH driven thresholds and intervals for many SBs. The BA fleet is entering a period where an increasing number of the a/c have or will soon reach the 26,000FH threshold called up by the SB. We would generally be reliant therefore on the alternative threshold of 2000FH from the AD's effective date. The proposed inspection threshold of 2000FH corresponds to less than 5 months for our fleet. This will make it impossible for our fleet to make it to their next C checks before reaching the threshold. In addition the short 2000FH subsequent interval (again <5 months) would also make future planning very difficult and expensive. Considering all 16 doors are required to be inspected and the work that involves, BA believe that the operational consequences of this for the BA fleet would be severe resulting in additional down time.

BA would like to make the following observation and recommendation / request which represents our preferred option going forward:

- A. As the nature of the damage being inspected for is environmental, we would suggest that it would be more appropriate for the inspection threshold and interval to be date driven and not defined in terms of FH or indeed FC. In order to greatly reduce the operational impact of this SB for both BA and I'm sure other operators, BA would like to propose a 24month threshold and interval from effective date of the AD. This would allow BA to plan in the task in an effective and non-disruptive manor.
- B. As an alternative, a staggering of the inspection requirements from door to door over a 24 month period would alleviate the potential issue highlighted above. However, our first recommendation above remains our preferred option.

Please could I ask that EASA takes into consideration the above comments prior to mandating the subject SB and if possible in conjunction with Airbus make the requested changes if considered acceptable.

EASA response:



- A. TRCS corrosion is a time-related effect and estimated on FH basis. For this system, a safety system analysis is also estimated on FH basis. Threshold and interval as proposed are in line with the calculated risk. A final fix is expected and will be proposed (when available), which would cancel the need for the repetitive testing.**
- B. Comment not agreed. The PAD does not specify that all doors must be inspected simultaneously, or during the same maintenance visit; as long as the compliance times are not exceeded, 'staggering' the inspections within those periods is allowed.**
- No changes have been made to the revised PAD in response to this comment.**

Commenter 2: Emirates – Azaib Al Shamsi – 13/01/2020

Comment # 2

Para (1) of the PAD provides the requirements as follows:

Before exceeding 26 000 flight hours (FH) since first installation of the affected part on an aeroplane, or within 2 000 FH after the effective date of this AD, whichever occurs later, and, thereafter, at intervals not to exceed 2 000 FH, inspect (wake-up test) the affected part in accordance with the instructions of the SB.

- A. Since it is extremely difficult for UAE to trace the installation of the TRCS on all doors on all airplanes (16 x 117 airplanes = 1,872 doors), we request that the AD uses the compliance which is stated in Airbus SB as follows: 26000 Flight Hours (FH) from (aircraft) entry into service.
- B. Also, could you please clarify if the repeat inspection is set at 2000 FH, regardless whether the TRCS is replaced or not.

EASA response:

- A. Comment agreed. Nevertheless, referring to entry into service date (date of aircraft manufacture) is acceptable, except if any TRCS has been installed on an aircraft post entry into service. In such a case the actual FH accumulated by the TRCS have to be referred to, to determine when the TRCS has to be inspected in accordance to the PAD. The PAD has been revised accordingly.**
- B. Comment noted. It is confirmed that inspection is to be repeated every 2 000 FH, regardless whether the TRCS is replaced or not.**
- No changes have been made to the revised PAD in response to point B of this comment.**

