

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-011

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

Commenter 1: Lufthansa Technik – Maximilian Pitzner – 21/01/2020

Comment # 1

- A. MRB Revision 19 is not available at PAD 20-011 release date. Please refer to a released MRB Revision when releasing the AD.
- B. PAD 20-011 (equal to AD 2013-0251) requires an operational test of the spoiler locking function of the SSCs of the blue and yellow hydraulic circuit. MRB task 27.64.00/03 (MRB Rev 18 and MRB Rev 19-Draft) does not limit the inspection to blue and yellow. Since the Future AD might be combined with the MRB Task in the Aircraft Maintenance Program it is, on LHT point of view, not required to restrict the inspection to the blue and yellow system only. Thus LHT propose to inspect the Spoiler SSCs of blue, green and yellow with the AD or to implement the 48mth interval into the MRB Task for PAD 20-011 and AD 2013-0251.
- C. As a calendar date interprets environmental influences, what is the justification that PAD 20-011 requires a calendar date interval?

EASA response:

- A. **Comment agreed. MRBR Revision 19 task 27.64.00/03 (operational check of spoiler servo-control hydraulic locking function) has not been revised, the content is identical to MRBR Revision 18. Therefore, the AD has been amended to refer to the MRBR at both Revisions 18 and 19.**
- B. **Comment not agreed. There is a higher risk to loose the Blue or Yellow pressure in the event of an engine failure at take-off (only one engine pump on Blue and Yellow circuits). The risk is lower on Green circuit (two engine pumps on Green circuit). Therefore the unsafe condition is only present for Blue and Yellow circuits. The same logic applied for A330 (non Neo) and A340 aeroplanes, hence the DET required by AD 2013-0251 is only to be accomplished on blue or yellow hydraulic circuits. In addition, it is acknowledged that the scope of the MRB task is wider than the scope of this Final AD. Operators can perform the functional test in the green system too (no need to extend the scope of the Final AD).**
- C. **Comment noted. The interval specified in the Final AD is the result of the safety analysis accomplished during the certification of the A330-941 aeroplane. It is to also be noted that the calendar time (threshold/interval) covers the necessary time in terms of FC/FH.**

No changes have been made to the Final AD in response to points B. and C. of this comment.



Commenter 2: Liebherr-Aerospace Lindenberg – Michael Koros – 24/01/2020**Comment # 2**

The reason mentioned in the PAD 20-011 is based on the wording used in the AD 2013-0251.

The AD2013-0251 is one of the successor ADs released in the frame of spoiler servo control actuators MZ series lost their hydraulic locking function after implementing the replacement of maintenance cover as requested according AD 2008-0160.

In addition the AD2013-0251 states that after Airbus reassessment they determined that it is necessary to introduce a repetitive inspection of the spoiler servo control irrespective of SCC type. Therefore Airbus issued three SBs for those repetitive inspections on all A330, A340 and A340-500/600 aeroplanes.

As supplier for the spoiler servo controls Liebherr has cleared all failures due to a sheared seal on the blocking valve on the outdated MZ-type Spoiler Servo Controls. Liebherr-Aerospace wants to make clear that the repetitive inspection of the hydraulic locking function of the SSC is not due to these failure. We therefore propose to refer in the PAD 20-011 to the AD 2013-0251 with the remark that the required action is also extended to A330 NEO (A330-941).

EASA response:

Comment agreed. It is also agreed that it was determined that actions are necessary regardless of spoiler servo control actuator type. For clarifications, the Reason paragraph of the Final AD has been amended in response to this comment.

