

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-023

**[Published on 03 February 2020 and officially closed for comments on 02 March 2020]**

### **Commenter 1: Virgin Atlantic Airways – Martin Downey – 04/02/2020**

#### **Comment # 1**

In Test/Compliance (3) reference is made to “AMM task A330-32-33-00-710-809 , or AMM task A340-32-33-00-710-806, as applicable”.

The AMM Task reference format contained in the aircraft maintenance documentation does not contain the aircraft type designator as used in the AD wording. For clarity and consistency I propose that the wording should be amended to “A330 AMM task 32-33-00-710-809 , or A340 AMM task 32-33-00-710-806, as applicable”.

#### **EASA response:**

**Comment agreed. The Final AD has been amended in response to this comment.**

### **Commenter 2: Lufthansa Technik AG – Christoph Heinen – 13/02/2020**

#### **Comment # 2**

Airbus SBs A330-32-3293, A340-32-4317, A340-32-5120, respectively MOD 200949 modify the A/C to a configuration with only TY3409-01A FFA units that are not affected. Interchangeability is oneway from AR02404 to TY3409-01A.

Therefore, the AD applicability should exclude A/C that were modified/delivered with above mentioned references. Those SBs should also be included as an alternative into the terminating action.

#### **EASA response:**



***Comment partially agreed. The Final AD Applicability remains as in PAD 20-023, as Paragraph (7) of the Final AD must remain applicable to all aeroplanes. However, Airbus Mod 200949 and all related SBs have been introduced in the Final AD, Group 2 definition, confirming that an aeroplane post Mod 200949 or post SB (as above) is a Group 2 aeroplane. No replacement action is required for these aeroplanes.***

**Commenter 3: Delta Air Lines – Neil Duggan – 04/03/2020**

### **Comment # 3**

#### **References:**

- /1/ EASA PAD 20-023; issued 03Feb20
- /2/ Airbus Retrofit Information Letter (RIL) LR32M18008932 R02; dated 21Jan20
- /3/ Triumph Service Bulletin AR2404-32-L3409-1 REV 2; dated 21Oct19
- /4/ Airbus Alert Operations Transmission (AOT) A32L012-18 REV 03; dated 21Jan20

After reviewing reference document /D/ and related documents carried within, DAL is submitting the following comments:

- A. To ensure accurate compliance to the mandated tooling section 4.3, Spares and Tooling, Airbus AMM 32-33-18-400-801-A section 4(C) should be updated to accurately reflect the correct the tool part number (P/N) for the Left Hand MLG Rigging Pin Tool. It incorrectly states P/N “DNSA 2028080” and should accurately state P/N “98DNSA2028080”.
- B. DAL requests that AMM 32-33-18 and 32-33-19 be updated to reflect the operational check time limits requirements (17 seconds, 16 seconds, etc) contained within AOT A32L012-18 REV 03 Appendix 1.
- C. To ensure accurate compliance to the mandated tooling, the labeling on tool P/N 97F32001001000, Control Unit-Leg Free Fall Actuator was found to be incorrect where “A” and “B” labels were reversed. Delta requests EASA notify and confirm with Airbus, and then if appropriate, provide relief in the EASA AD for this confirmed error.
- D. In section 4.2.4 ‘Active Replacement’ of reference /4/; DAL requests correction on the industry support within reference /2/; as these documents are part of the mandate established by reference /1/. Reference /4/ mandates an active retrofit plan as defined in reference /2/ and /4/. Reference /2/ section 1 ‘General Evaluation’ states that for industry support, material and spares will be chargeable back to operators if units are returned prior to a FFA failed test as defined in reference /4/ Appendix 1. However, reference /4/ mandates the active removal campaign within a specified timeframe (2 or 4 years depending on where the FFA S/N is listed within the reference /4/ Appendix). DAL requests that the financial penalty



defined within reference /2/ section 1 'Industry Support' be removed as operators are being mandated to actively remove affected FFAs per reference /1/ which aligns with the 31Jan24 date March 03, 2020.

**EASA response:**

*Points A., B. and C. of this comment are noted. These comments were passed to Airbus and it may be expected that the necessary documentation will be amended. However, it is confirmed that Final AD compliance is achievable using Airbus AOT instructions as currently written.*

*As for point D. of this comment, this is not related to the Final AD and DAL should discuss these issues directly with Airbus.*

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

**Commenter 4: Qatar Airways – Genaro T. Villapando – 04/03/2020**

**Comment # 4**

Airbus AOT A32L012-18 Rev.03 (cited in the subject EASA PAD) requires active replacement of affected pre-Mod Free Fall Actuators (FFA) P/N AR02404 listed in the AOT Appendices. It is noted that the post-Mod FFA P/N TY3409-01A has been introduced through Airbus SBs A330-32-3293 and A340-32-4317 (related to Airbus MOD 200949).

*As such, the installation of post-Mod FFAs in-service in accordance with these Airbus A330/A340 SBs should also be considered as an optional Terminating Action to the AOT inspection requirements.*

Note: It is understood that the Modification SBs referenced above cover all Serial Numbers of pre-Mod P/N AR02404 whereas the AOT covers a specific population of the same pre-Mod Part Number.

Indeed, the terminating action of the AD / AOT inspection requirements is the replacement of all the affected serial numbers on aircraft.

An affected Free Fall Actuator/s can either be replaced by:

- a pre-Mod Actuator (P/N AR02404) whose serial number is NOT listed in any appendices of the AOT; or
- any post-Mod Actuator PN TY3409-1A (whatever its serial number); or
- *implementation of SBs A330-32-3293 or A340-32-4317 (as applicable) on all affected FFA positions on aircraft.*

QQE COMMENT:

Please review the above and kindly advise if EASA could consider including the Airbus SBs A330-32-3293 and A340-32-4317 as references for optional Terminating Action in the proposed AD to be issued?



***EASA response:***

***Comment partially agreed. See also EASA answer to Comment #2 above. In addition, there is no need to mention a reference to these SBs in Terminating Action paragraph as the paragraph, as currently written, considers terminating action to be installation of any FFA which is not an affected part.***

