

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-075

[Published on 07 May 2020 and officially closed for comments on 21 May 2020]

**Commenter 1: Air France – Jérémy DUROU – 15/05/2020**

### Comment # 1

- A. SubTask A380-A-36-XX-8026-14001-920A-A - Replace the APU 1 Loop A and B OHDS Fasteners between FR47 and FR56 **\*\*CONF003\*\*** in page 462 of the SB A380-368026 REV02 is not applicable for A/C that have already embodied TA 80685511/012/2019 in accordance with NOTE 1. However this TA 80685511/012/2019 seems to have no direct link with the associated instructions. After detailed comparison between instructions of SB A380-36-8026 REV01 page 123 and SB A380-36-8026 REV02 page 462, there is no relevant differences in the procedure (item number, Part Number, Figure, localization...). Why this TA 80685511/012/2019 covers the application of the SubTask A380-A-36-XX-8026-14001-920A-A and what is the link and/or associated discrepancies coverage?
- B. In the case of A/C is embodied with A380-36-8026 REV01 but not with TA 80685511/012/2019, should we consider that the SubTask A380-A-36-XX-8026-14001-920A-A is still applicable?
- C. If [the answer to B above is] yes, the instructions of SB A380-36-8026 REV02 page 463 require to discard *BOLT item (39)* and *WASHER item (102)* but this operation was already perform through SB A380-36-8026 REV01 page 123. In addition it is required to install new parts *SPACER item (90)* ; *WASHER item (42)* ; *BOLT item (86)* that they are exactly the same of parts installed during embodiment of A380-36-8026 REV01 page 123. What is the objective of this Additional Work SubTask A380-A-36-XX-8026-14001-920A-A if the A/C was modified in accordance with SB A380-36-8026 REV01?
- D. In addition the SubTask A380-A-36-XX-8026-14001-920A-A requires the Part Kit 368026C10R00 that is not procurable and considered as "Administrative" Part Kit because already provide through SB A380-36-8026 REV01 kitting. Should the instructions not be "Retain SPACER item (90); WASHER item (42); BOLT item (86)" then after "re-install SPACER item (90); WASHER item (42); BOLT item (86)" instead of "Discard" and "install NEW parts"?

### EASA response:

**Comments noted. Since these are comments on the (detailed content of) Airbus documentation, not to the PAD, they should be addressed to Airbus, not to EASA. These cannot be taken into consideration for the Final AD.**



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

**Commenter 2: Lufthansa – J. Manuel Perez Fernandez – 18/05/2020**

**Comment # 2**

Airbus published following Technical Adaptations (TA 80445344 014 2018 1-12, TA 80605526 028 2019 1-8, TA 80605526 030 2019 1-6 and TA 80746902 022 2020 1-3) these TAs were published to reflect all changes that are now part of SB A380-36-8026 Rev 02. Could you please refer these TAs in your AD that they are an acceptable means of compliance for A/C modified before of the release of the new EAD.

**EASA response:**

***Comment not agreed. The number of TA issued by Airbus and the different combinations thereof, applicable for each operator or individual MSN, makes it impractical to include these into the AD. However, Airbus is committed to apply to EASA, on behalf of the affected operators, to have the various TA combinations recognised as AMOC to the AD 'additional work' requirements.***

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

