

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-092

[Published on 08 June 2020 and officially closed for comments on 06 July 2020]

Commenter 1: British Airways – Daniel Fenwick – 09/06/2020

Comment # 1

Required Action (5) states that additional work must be carried out before 18 June 2020 for aircraft previously modified at SB A380-92-8103 Rev 00 or 01. This additional work is in accordance with SB A380-92-8103 Rev 02.

Required Action (6) states that additional work must be carried out within 7 months from AD effective date for aircraft previously modified at SB A380-92-8103 Rev 00, 01 or 02. This additional work is in accordance with SB A380-92-8103 Rev 03.

- A. The combination of actions (5) and (6) are confusing, as an aircraft can be applicable to both actions. Please can EASA consider removing action (5) and retaining action (6)? Example: For an aircraft previously embodied at Rev 00, must we first perform the additional work per SB Rev 02 before 18 June 2020 to comply with action (5), and then carry out further additional work per SB Rev 03 at a later date per action (6)? Surely it would be best to complete all additional work together as per the latest version of the SB, as SB Rev 03 clearly gives the work required depending on whether aircraft was previously embodied at Rev 00, 01 or 02.
- B. Regarding the timescales listed in action (6), BA has concerns about the ability to meet these deadlines, given the current worldwide situation with many aircraft parked. Currently the BAW A380 fleet is parked away from its normal maintenance facilities and it is possible that the proposed AD once published with a calendar only interval will expire before these a/c fly again, with the operator being forced to request an extension to the AD compliance interval. Please can EASA review the timescales with the view to either extending, or changing to be based on time from aircraft return to service date, or changing to be based on FH or FC from a certain date as a calendar equivalent FH/FC interval will not increase the risk of system failure per the original safety analysis?
- C. Regarding Required Action (7), please can you clarify. Completion of the referenced ALS CMR task after modification of the aircraft per SB A380-8103 Rev 01 or 02 eliminates the need to perform any additional work? So, additional work would only be required if the SB was accomplished at Rev 00?
- D. In advance of SB Rev 03 issuance, Airbus issued TA 80629793/006/2019. Please can EASA confirm that completion of SB Rev 02 + TA 80629793/006/2019 satisfies the additional work requirement of SB Rev 03, and therefore complies with required action (6)?



EASA response:

- A. Comment agreed. The requirement of paragraph (5) is unchanged in the Final AD, as this is a retained requirement, which should have been already done. References to the SB at original issue or Revision 01 have been removed from paragraph (6) of the Final AD to avoid conflict or confusion.**
 - B. Comment noted, but not agreed. For any aircraft that is out of service, compliance with ADs having a calendar time limit is not required until (just before) that aircraft is returned to service.**
 - C. Comment noted. EASA confirms that, since the 'additional work' of the SB at R03 would have been done during the referenced ALS CMR task, that would not need to be done again.**
 - D. Comment agreed. The Final AD has been amended to include credit for the affected TA.**
- No changes have been made to the Final AD in response to points B. and C. of this comment.**

Commenter 2: Emirates – Paul C. Runes – 21/06/2020**Comment # 2**

Prior to the release of Revision 03 of SB A380-92-8103, Airbus has issued by SBIT 19-0037. Following that, Airbus issued TA Ref: 80629793/006/2019 Issue 2. Subject PAD does not give reference to the SBIT nor to the TA.

Shouldn't the proposed AD also give credit to those aircraft that have been checked in accordance with the instructions given in the said TA prior to the issuance of SB A380-92-8103 Revision 3?

EASA response:

Comment agreed. See EASA answer to Comment #1, point D, above.

Commenter 3: Deutsche Lufthansa – Lars Weinerth – 06/07/2020**Comment # 3**

After reviewing EASA PAD 20-092, DLH has some concerns about the paragraph 6.

- (6) For an aeroplane that was modified, before the effective date of this AD in accordance with the instructions of Airbus SB A380-92-8103 at original issue, or Revision 01, or Revision 02, within 7 months after the effective date of this AD, accomplish the actions identified as “additional work” in the SB.

Paragraph 6 requires the accomplishment of the additional work described in SB A380-92-8103 Rev 03 for A/C that was modified on any further revision. The requirement does not take into account if an A/C was modified additionally with Technical Adaptations. The SB Rev.03 mentions the following:

NOTE: This revision satisfies the requirements of the subsequent Technical Adaptation(s) (TA 80629793/006/2019) issued for the related Manufacturer Serial Number (MSN)s.

The DLH A380 fleet is modified with different SB Revisions but always together with all available TA and SBIT information. Is it possible to adapt the paragraph 6 of the PAD in that way, that accomplishment of the SB revisions including the related TAs satisfies the requirements, or do we have to request an AMOC?

EASA response:

Comment agreed. See EASA answer to Comment #1, point D, above.

