

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-102 & 20-102R1

[Original PAD published on 01 July 2020, revised on 02 July 2020 and officially closed for comments on 15 July 2020]

### Commenter 1: Cathay Pacific – Alfred Lee – 02/07/2020

#### Comment # 1

Regarding the compliance time scale of subject PAD, please unify the compliance time to “1000 FC after the AD effective date” in the final AD as the AOT A27L014-20 compliance time is “1000 FC from AOT issue date” which is different from what being proposed in the PAD.

#### EASA response:

**Comment noted, but not agreed. For the compliance time, both, Airbus AOT A27L014-20 (Original issue and Rev 01) and EASA PAD 20-102R2 are expressed in FH, not in FC.**

**No changes have been made to EASA PAD 20-102R2 in response to this comment.**

### Commenter 2: Airbus Transport International – Aurélien Person – 07/07/2020

#### Comment # 2

Airbus Transport International (ATI) has one comment related to the applicability chapter of this PAD. The AMM reference applicable to A330-743L is not listed in the PAD; the applicable AMM reference for A330-743L is 27-44-51-400-801-C.

Here is below the proposed modification in blue color:

"Applicability: Airbus A330-201, A330-202, A330-203, A330-223, A330-223F, A330-243, A330-243F, A330-301, A330-302, A330-303, A330-321, A330-322, A330-323, A330-341, A330-342, A330-343, A330-743L, A330-841 and A330-941 aeroplanes, all manufacturer serial numbers (MSN) up to MSN 1964 inclusive, except those on which Airbus Aircraft Maintenance Manual (AMM) task 27-44-00-210-801-A (Revision of July 2019 or later) or AMM task 27-44-51-400-801-A (Revision of July 2019 or later) or **AMM task 27-44-51-400-801-C (Revision of July 2019 or later)** has been accomplished; and "



ATI would like the EASA to review this comment and add the AMM reference in the applicability chapter of this PAD.

**EASA response:**

**Comment agreed. EASA PAD 20-102R2 has been amended in response to this comment.**

**Commenter 3: Delta Air Lines – James Thompson – 14/07/2020**

**Comment # 3**

**References:**

- (1) Airbus AOT A27L014-20 original issue dated 26 May 2020
- (2) EASA Proposed Airworthiness Directive: PAD No. 20-102 R1, dated 02 July 2020
- (3) Aircraft Maintenance Manual (AMM) task 27-44-00-210-801-A - Detailed Inspection of Following Items of Trimmable Horizontal Stabilizer Actuator: Fail Safe Nut, Upper and Lower Attachments (Primary and Secondary...– **Revision of July 2019 or later**
- (4) Airbus AOT A27L014-20 Appendix 1- Context and photo example
- (5) AMM task 27-44-51-000-804-A - Removal of the Bearing for the Primary Gimbal Joint – Any revision
- (6) AMM task 27-44-51-400-804-A - Installation of the Bearing for the Primary Gimbal Joint – Any revision
- (7) IPC Figure 27-44-04-01B comparison with AMM 27-44-00-210-801-A Figure

**SUMMARY:** Ref (1) details occurrences of incorrect installation of Trimmable Horizontal Stabilizer Actuator (THSA) lower attachment parts. The investigation concluded that this incorrect installation was due to human errors during production and maintenance.

Ref (2) requires a one-time detailed inspection of the THSA lower attachment parts to verify proper installation in accordance with Ref (1) and, depending on findings, accomplishment of applicable corrective action(s). Ref (2) also prohibits the use of certain AMM task instructions.

**DELTA'S COMMENTS**

- A. Ref (1) '4. SHORT TERM ACTION', Note 2 states: *"The accomplishment instructions of this AOT include procedures given in other documents or in other sections of the AOT. When the words 'refer to' are used and the operator has a procedure accepted by the local authority he belongs to, the accepted alternative procedure can be used. When the words 'in accordance with' are used then the given procedure must be followed."*



Ref (1) '4.2.2 RC – INSPECTION REQUIREMENTS' contains instruction to perform the one-time detailed inspection "as per Ref. 2 AMM task", where the Ref. 2 AMM task is Ref (3). The language provided here does not match with the language of 'refer to' or 'in accordance with' from Note 2 above. This is also present in the instructions found in Ref (1) '4.2.3 RC – FINDINGS'.

DAL is requesting clarification on these instructions and whether the accomplishment instructions of the AOT 'refer to' the AMM tasks or must be performed 'in accordance with' the AMM tasks.

- B. Additionally, Ref (4) 'Correct Assembly' point 3. States "Bolt touching cup washer and correctly torqued". It is believed that this note is in error, as the bolt should be touching the key washer, which is also supported by the instruction in Ref (3) to "Make sure that the bolt (11) touches the key washer (10)." DAL would like for the correction to be made to Ref (4) prior to AD release.
- C. Ref (1) '4.2.3 RC – FINDINGS' states that "disassembly of the parts will be required for inspection using Ref. 6 AMM task. These parts will then be reinstalled or replaced depending of their condition using support of Ref. 7 AMM task", where Ref 6. AMM task is Ref (5) and Ref 7. AMM task is Ref (6). Neither Ref (5) nor Ref (6) contains any criteria for the condition of the removed parts to be used for reinstallation.
- D. Comparing Ref (4) figure for the lower attachment bearing assembly with Ref (3) AMM figure for the lower attachment bearing assembly shows differences between the two figures. Ref (4) figure shows the left and right bearing assemblies as being identical, whereas Ref (3) shows the left-side assembly having a cotter pin while the right-side assembly does not. Ref (7) contains both figures side by side for comparison.

DAL would like clarification on the correct configuration of the left and right side bearing assemblies to provide the correct figure for the detailed inspection, and would like the necessary references to be updated to the correct configuration prior to AD release.

***EASA response:***

- A. Comment noted. Airbus published AOT A27L014-20 Rev 01 that addresses the matter.***
  - B. Comment noted. Airbus confirmed the mistake to EASA. AOT A27L014-20 Rev 01 addresses that matter.***
  - C. Comment noted. Airbus confirmed to EASA that each operator should be capable to determine if a part that was removed, because it was wrongly installed in production, could be reinstalled on an aeroplane or not.***
  - D. Comment noted. Airbus confirmed the mistake to EASA. AOT A27L014-20 Rev 01 addresses that matter.***
- EASA PAD 20-102R2 has been published in response to these comments.***

