

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-102R2

[Published on 17 December 2020 and officially closed for comments on 31 December 2020]

Commenter 1: Air France – Amandine Raynal – 18/12/2020

Comment # 1

Airbus AOT A27L014-20 Rev 01 applicability excludes MSNs which have already been inspected in accordance with AOT Rev 00.

However, in PAD 20-102R2, it is not clear whether these MSN are still concerned by the PAD or not, even though they already accomplished the inspection IAW AOT Rev 00.

Can you please clarify?

EASA response:

Comment noted. Paragraph (3) of the Final AD confirms that DET and, depending on findings, corrective actions on aeroplane, accomplished before the effective date of this AD in accordance with the instructions of Airbus AOT A27L014-20 at original issue, are acceptable to comply with the requirements of paragraphs (1) and (2) of this AD for that aeroplane. So, no need to inspect again. However, for these aeroplanes, the other paragraphs remain applicable.

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

Commenter 2: Cathay Pacific Airways – Alfred Lee – 29/12/2020

Comment # 2

Regarding to subject PAD, CPA has the following concerns for PAD par. 5:

****Quote Beg****

For Group 1, Group 2 and Group 3 aeroplanes: From the effective date of this AD, it is allowed to use the instructions of the AOT, as defined in this AD, or to use the instructions of Airbus AMM task 27-44-00-210-801-A or AMM task 27-44-51-400-801-A (or -C), as applicable, provided that the task containing the instructions of the AOT.

****Quote End****

Does that mean operator need to use the AOT instructions as supplement to perform Airbus AMM task 27-44-00-210-801-A or AMM task 27-44-51-400-801-A (or -C) because the AMM Figure 27-44-00-991-01000-00-A (from 27-44-00-210-801-A) is still incorrect? If it is the case, then it would be very difficult for operator to control as the AMM 27-44-00-210-801-A is a MPD task in which only AMM 27-44-00-210-801-A will be called out to perform without AOT instruction. It is acceptable to perform the AOT as one-off instruction but very hard to mix with MPD task. Alternatively, could EASA issue the AD after all affected AMM being corrected?

Or can operator just use Airbus AMM task 27-44-00-210-801-A or AMM task 27-44-51-400-801-A (or -C) at rev of Jul 2019 or later?

EASA response:

Comment acknowledged. Airbus AMM task 27-44-00-210-801-A or AMM task 27-44-51-400-801-A (or -C) at rev of Jul 2019 cannot be used as it is an affected AMM task, as defined in the Final AD. So, only an AMM revision containing the instructions of the AOT for these tasks can be used.

As specified in Note 1 of the Final AD, Airbus plan to publish a revision of the applicable AMM in April 2021, which should contain the correct instructions as specified in the AOT, for these tasks.

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

Commenter 3: Virgin Atlantic Airways – Martin Downey – 05/01/2021

Comment # 3

References:

/1/ PAD 20-102 R2

/2/ AOT A27L014-20 Rev 01

Virgin Atlantic Airways has reviewed the Ref /1/ PAD and the Ref /2/ Airbus AOT. Our concerns relate to the quality of the maintenance instructions contained in the Ref /2/ AOT.

Firstly, Virgin Atlantic Airways wishes to highlight our concern that the Ref /2/ para 4.2.2 RC – INSPECTION REQUIREMENTS and Ref /2/ para 4.2.3 RC – FINDINGS are written in the *PASSIVE VOICE*, and do not satisfy industry standards or best practice for the authoring of maintenance instructions. To



ensure that the maintenance instructions are clearly and unequivocally communicated, specific/prescriptive step-by-step instructions shall be provided, and the imperative mood shall be used.

For reference, Ref /2/ para 4.2.2 states:

Verification of the correct installation of both LH and RH sides THSA lower attachment are to be performed by means of a one-time detailed visual inspection on aircraft while referring to the Ref. 2

AMM task revision of July 2019 (or later) and the additional information provided in AOT Appendix 1.

Specific attention must be paid to:

- Pin (item 330 / 280) inserted in one hole of cup washer (item 340 / 290),*
- Key of keywasher (item 320 / 270) inserted in the other hole of cup washer,*
- Bolt (item 310 / 260) flush with keywasher, itself flush with cup washer and bolt cannot move,*
- Both tabs of keywasher folded against 1 or 2 faces of bolt head.*

Refer only to AOT Appendix 1 for illustration and not to AMM Figure 27-44-00-991-01000-00-A.

NOTE: The LH and RH bearing assemblies are not identical. The LH assembly has a cotter pin while the RH assembly does not (refer to AMM Figure 27-44-51-991-01100-00-C (SHEET 2/2)).

The parts to be inspected in the frame of this AOT are the same on both sides (the cotter pin is not one of them).

For reference, Ref /2/ para 4.2.3 states:

In the event of incorrect installation on one or both sides (correct assembly provided in Appendix 1), the disassembly of the bolt (item 310 / 260), the keywasher (item 320 / 270) and the cup washer (item 340 / 290) on both LH and RH sides will be required for inspection using support of the Ref. 6 AMM task.

These parts will then be reinstalled or replaced depending of their condition using support of the Ref. 7 AMM task.

In any case, the keywasher (item 320 / 270) is considered as a consumable part and will need to be replaced.

NOTE 1: The correct insertion of the pin (item 330 / 280) in one hole of the cup washer will be checked but the pin does not need to be removed.

NOTE 2: Ref. 6 and Ref. 7 AMM tasks do not need to be entirely performed as the removal of the bearing (item 350 / 300) is not necessary. They are only mentioned as support for the removal/installation of the bolt (item 310 / 260), the keywasher (item 320 / 270) and the cup washer (item 340 / 290).

NOTE 3: For determining the condition of the removed parts (re-usable or not), industry standard practices or airline policy will be used. In case of doubt, the parts need to be replaced.



Examples of observed incorrect installation are provided in Appendix 1.

In case parts are found separated from the THSA:

- *Inspection referring to the Ref. 4 AMM task will be required and*
- *THSA has to be replaced referring to Ref. 3 revision of October 2020 (or later) and Ref. 5 AMM tasks.*

In case of findings in the accomplishment of Ref. 4 AMM task, contact Airbus.

The contents of Ref /2/ para 4.2.2 and para 4.2.3 do not provide prescriptive step-by-step maintenance/inspection instructions, and do not meet the expected standards for aircraft maintenance instructions. To avoid ambiguity and to ensure that the inspection is performed to a consistent standard, it would be necessary for operators to reword the required inspection work instructions to provide prescriptive and imperative worksteps. This would result in deviation from the wording of the Ref /2/ Required Compliance (RC) sections, and thus non-compliance with the AOT/AD requirements.

Virgin Atlantic Airways recommends that the Airbus shall revise the Ref /2/ AOT to provide adequate maintenance/inspection instructions prior to the issue of an EASA AD mandating compliance.

Secondly, Ref /2/ para 4.2.3 does not give specific guidance regarding the assessment of serviceability of the removed parts. Airbus shall specify the acceptance criteria in the AOT instructions; the existing statement “*industry standard practices or airline policy will be used*” is not satisfactory.

EASA response:

Comments noted, but not agreed. These comments are strictly on the Airbus AOT, not on the EASA PAD, and should therefore be addressed to Airbus, not to EASA.

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

