

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-125

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Commenter 1: Hainan Airlines Aviation Technic – Xiaoping Luo – 23/09/2020 & 24/09/2020

Comment # 1

Ref (1): EASA PAD No.: 20-125, issued 26 August 2020

Ref (2): Airbus SBA330-53-3297R00, published January 29, 2020

Ref (3): A330 IPC53-35-11 Figure 53-35-11-02, revised July 01, 2020

A. The Ref (1) EASA PAD and Ref (2) Airbus SB are applicable to Airbus A330-243, A330-343 and A330-941 aeroplanes, which have manufacturer serial number (MSN) 1889, 1891, 1893, 1894, 1895, 1896, 1897, 1898 and 1899, the affected part numbers (P/N) are F5335002000000, F5335001900000, and F5335001900200 in according with Ref (2) Airbus SB, and NO series number (S/N) limited. However, the affected part numbers are applicable to all aeroplanes as shown in Ref (3) A330 IPC. Thus the affected parts may not be inspected and replaced in case of they are exchanged to other airplanes before or after the subject AD effective. Hence,

(1) HNAT requests EASA to revise the applicability from “Airbus A330-243, A330-343 and A330-941 aeroplanes, manufacturer serial number (MSN) 1889, 1891, 1893, 1894, 1895, 1896, 1897, 1898 and 1899.” to “Airbus A330-243, A330-343 and A330-941 aeroplanes, //ALL// manufacturer serial numbers (MSNs)”; AND,

(2) Add a new //Part Installation// requirement paragraph into //Required Action(s) and Compliance Time(s)// of final published AD to avoid suspected parts installing to other aeroplanes; OR,

(3) Specify detailed S/Ns of affected parts definitely in //Applicability// of final published AD.

B. In Ref (2), Airbus required operator to //INSPECT// and //REPLACE// the affected rods, In order to avoid confusing, HNAT requests EASA to revise the words in //Required Action(s) and Compliance Time(s)// from “....., replace each affected part with a serviceable part in accordance with the instructions of the SB.” to “....., //INSPECTION // AND replace each affected part with a serviceable part in accordance with the instructions of the SB” in final published AD.

- C. The requirement is not clear in both subject PAD and Airbus SB for affected parts in case of the P/N is not clear or unknown during perform inspection in accordance with the instructions of the SB. HNAT recommends EASA to clarify it in final published AD. Such as replace the affected parts directly as a conservative actions.

EASA response:

- A. Comment not agreed. The AD and SB are applicable to these MSN only, as the manufacturing issue is limited to a certain number of affected parts. As these parts have no serial numbers, Airbus identified on which aeroplanes these affected parts were installed on the assembly line during production of the aeroplanes <2 years ago. For the time being, EASA consider that there is no need to extend the AD to all aeroplanes for this reason. If these parts have already been removed from these aeroplanes, the operator should contact Airbus.**
- B. Comment not agreed. It has become EASA standard not to require an inspection when the sole purpose of the inspection is to identify if an affected part is installed or not.**
- C. Comment partially agreed. The inspection as specified in the SB is not required by the Final AD (installed P/N is expected to be known by the operator), only the replacement action is required. In the case of having a part installed for which the P/N cannot be identified, it is advisable to contact Airbus and the competent authority (mostly, State of Registry of the aeroplane) for guidance.**

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

