

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-145

[Published on 23 September 2020 and officially closed for comments on 21 October 2020]

Commenter 1: Deutsche Lufthansa – Walter Press – 29/09/2020

Comment # 1

DLH had received your announcement for a further airworthiness directive with PAD 20-145 and want comment this document.

- A. [SB 1] The PAD mentions SB A340-53-4117 for a specific bunch of aircraft. For the requested modification the concurrent modification SB A340-53-4198 exists, which renders Service Bulletin No. A340-53-4117 obsolete. Therefore, you may have to add this modification also. However, despite this concurrent requirement I have doubts that all mentioned aircraft for SB 1 still exist. Could you please check if MSN 243 and MSN 264 were scrapped already? If so, it is not beneficial to have an airworthiness directive requirement for pieces of aluminium instead of an aircraft ☐. MSN 262 seems to be stored, but may be this aircraft will be scrapped soon.
- B. [SB 7] The modification as per SB A340-57-5023 is applicable to the spoilers of A340-500/600 aircraft. Due to the possibility of an exchange of these components, you may have to consider that a spoiler of the affected aircraft was removed and placed on another aircraft, which will not be in the scope of the PAD or AD, as it is restricted to specific MSN only. Nevertheless it involves some effort to integrate an Airworthiness Directive for multiple Service Bulletins in the database of all operators and is penalizing all of us when there are only a few aircraft are affected. For this reason we highly appreciated that the applicability of the PAD/AD is limited.

EASA response:

A. Comment agreed. EASA confirm that Airbus SB A340-53-4198 must be accomplished on all A340 aeroplanes and its accomplishment is required by EASA AD 2019-0243. That SB indicates that Airbus SB A340-53-4117 is obsolete and is no longer to be accomplished. As a consequence, this final AD no longer requires accomplishment of Airbus SB A340-53-4117 and it has been removed from the Final AD accordingly.

As for the mentioned MSN, EASA and Airbus have no confirmation that these planes are in service or not. Based on the removal of any reference to SB A340-53-4117, it has been decided to remove these MSNs from the Final AD Applicability accordingly.

B. Comment acknowledged.

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

