

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-012

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Commenter 1: Lufthansa Technik AG – Maximilian Pitzner – 17/02/2021

Comment # 1

- A. There is a typo in “Serviceable THSA” definition. Referenced AD 2014-0275 is not the correct one.
- B. Furthermore, if AD 2014-0257R1 was the AD to be mentioned, LHT would like to draw attention to the latest AD 2021-0037R0 which is the background to the issuance of this PAD. A serviceable THSA as defined by AD 2014-0257R1 is not in line with a serviceable THSA as defined in AD 2021-0037R0. AD 2021-0037 prohibits installation of affected THSA, defined in §4 of AD 2021-0037.
- However, this PAD complements AD 2014-0257 (for [PN 47175-200, 47175-300 are prohibited per AD 2014-0219] PN 47175-500, 47175-520) but for some of the latest THSA evolution status (for PN 47175-501, 47175-521).
- LHT proposes to reference both ADs 2014-0257R1 and 2021-0037R0 with a pre/post mod applicability configuration using for example the words “...unless the THSA has been modified as required by EASA AD 2021-0037, as applicable.”
- C. In the Definitions section, the PAD 21-012 is using the wording “Life Limit”. As per ALS Part 4 - Basic Rules - §5.5, a “Life Limited” component “shall be mutilated beyond repair limits to prevent rework to appear to be airworthy”. This means basically that the component will be scrapped. As the PAD is addressing its requirement to the regular No Back Brake (NBB) replacement, this wording is misleading as a NBB replacement is at least a “Servicing Limit”.
- Comparing the wording with AD 2014-0257, the wording “THSA FC Limit” with an explanation is used; or ALS Part 4 Variation 6.3 the wording “Remove complete THSA for No-Back Brake (NBB) carbon disk discard and replace with serviceable THSA unit” is used.
- Consequently, using the wording “Life Limit” could result in the scrapping THSA unwillingly. With the background, that these THSA PNs are no longer under production, the A340-500/-600 world fleet could be put out of service.
- LHT proposes to use a different wording, e.g. “THSA FC Limit” or “Servicing Limit”. Furthermore, LHT proposes to make the NBB replacement requirement more clear.



D. §1 of PAD 21-012 does not make it clear to replace a THSA for a No Back Brake replacement. Furthermore, it is not clear how to count the limit. LHT proposes to make it clear that the “Servicing Limit”, as defined, counts from first installation on an aeroplane, or from last NBB replacement, (or 30 days) after the effective date of that AD, whichever occurs later. However, if the Definitions are more precise, this comment may be obsolete.

EASA response:

A. Comment agreed. The typo has been corrected in the Final AD.

B. Comment not agreed. The AD identifies by P/N the THSA for which action is required. The Applicability of the Final AD remains unchanged, as the AD must apply to all aeroplanes for which these P/N are eligible. In that way, THSA Installation is regulated by paragraph (2), a requirement for the entire affected fleet.

C. Comment agreed. ‘Life Limit’ as specified in EASA PAD 21-012 was replaced in the Final AD with ‘THSA FC Limit’. In addition, the ‘THSA FC Limit’ definition was amended to consider FC accumulated since first (THSA) installation on an aeroplane, or since last NBB replacement (whichever is later). This is now aligned with EASA AD 2014-0257R1.

D. Comment acknowledged. The ‘life limit’ is not actually for the THSA itself, but for the NBB discs. The Final AD has been amended to make this (more) clear. See also EASA answer to point C above.

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

