

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-027

[Published on 22 February 2021 and officially closed for comments on 22 March 2021]

Commenter 1: The Emirates Group – Nasser Mohamed Almawed – 23 February 2021

Comment # 1

- A. There is no consideration for aircraft that have had the post-mod duct installed IAW IPC 36-12-42. Please confirm, if an aircraft has had post-mod duct installed IAW with the IPC 36-12-42, can this be considered as the accomplishment of the SB 36-8060, and therefore terminating the requirement for the mandatory inspection SB 36-8083 and this AD? Also, will this scenario be included in the AD?
- B. There is no compliance paragraph specifically for Group 2 airplanes. Paragraph 1 is related to Group 1 airplanes and Paragraph 2 is related to the repeat inspection.

EASA response:

- A. The commenter should consider that the IPC is only a catalogue of parts, indicating those which are eligible. Installation of a different P/N part on an aeroplane must be accomplished using approved aeroplane modification instructions such as Service Bulletins. In this specific case, installation of a cross-bleed duct P/N L3611513700000 or P/N L3611513800000 can be done only by applying the modification SB A380-36-8060.**

EASA suggest the commenter contacts Airbus and the authority of the State of Registry for advice, to determine whether the accomplished part replacement actions can be considered equivalent to the instructions of the Airbus modification SB.

The eventuality of an aeroplane already embodying, at AD effective date, the modification SB is already covered by the Terminating action paragraph (6). Aeroplanes that have cross-ducts P/N L3611513700000 or P/N L3611513800000 installed in production by means of application of modification (mod) 78093 are covered by the definition provided for Group 3 aeroplanes.

- B. For Group 2 aeroplanes, the actions specified in paragraph (2), (3), (4) and (7) must be accomplished and they all contain compliance times for Group 2 aeroplanes. The requirement in paragraph (2) also specifies, for Group 2 aeroplanes, when to accomplish the first DET inspection (ref Table 1, “within 1 500 FH or within 7 months, whichever occurs first after the effective date of this AD”).**

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



Commenter 2: All Nippon Airways (ANA) Co., Ltd – Yuta Kobayashi – 25 February 2021

Comment # 2

It looks like the compliance statement shown in paragraphs (1) and (2) is not consistent with Group 1 compliance statement in Table 1.

Our understanding based on paragraphs (1) and (2) for Group 1: It is necessary to perform detailed inspection before exceeding 36 500 FH since Airbus date of manufacture, or within 7 months after the effective date of this AD, whichever occurs first. After that we need to repeat inspection at intervals not to exceed 1 000 FH.

Group 1 compliance statement in Table 1: Before exceeding 36 500 FH since Airbus date of manufacture, or within 1 000 FH after the inspection as required by paragraph (1) of this AD, whichever occurs later.

A. Please clarify the compliance time for Group 1 aeroplanes.

B. Please fix and reflect it upon AD issuance as necessary.

EASA response:

Comments noted. For Group 1 aeroplanes, a first DET inspection must be accomplished before exceeding 36 500 FH since Airbus date of manufacture or within 7 months, whichever occurs first (see paragraph (1) of the AD).

The next DET inspection is then due before exceeding 36 500 FH since Airbus date of manufacture, or within 1 000 FH after the first inspection as required by paragraph (1) of the AD (see paragraph (2), Table 1 of the AD), whichever of these two events occurs later. DET inspections must then be repeated at intervals not exceeding 1 000 FH (see paragraph (2) of the AD).

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

Commenter 3: British Airways (BAW Engineering) – Matt Dennis – 19 March 2021

Comment # 3

Question A: Could EASA please confirm BAW understanding of the actions is correct as listed below?

Actions required as per PAD:

Action as per Paragraph 1: Inspection before 36 500FH or within 7 months from the effective date of the AD.



Action as per Paragraph 2: Carry out an inspection before exceeding the compliance times in Table 1 and thereafter, carry out an inspection every 1000FH (max).

Table 1: Cross Bleed Duct Inspection Compliance Time for Group 1: Carry out an inspection before exceeding 36 500FH or within 1 000FH after inspection as per Paragraph 1, whichever occurs later.

Consequently, given the current FH for the G-XLEA is 28 000FH, this means the inspection is to be carried out before 36 500FH.

Based on the PAD Actions, BAW understands the following is required for aircraft in Group 1.

1. A stand-alone inspection is to be carried out before the aircraft FH exceeds 36 500 or within 7 months of effective date of AD (the latter being applicable to G-XLEA)
2. A repetitive inspection is required. It is to have:
A threshold of either 36 500FH or 1 000FH after the stand-alone inspection, whichever occurs later.
The repetitive inspection is to be repeated at an interval not to exceed 1 000FH.

Question B: Could EASA please consider revising the text / table in order to clarify whether a stand-alone inspection and a repetitive inspection is required?

In addition, BAW believe grouping the relevant actions / compliance time-scales for Group 1 and 2 separately would make it easier to interpret.

EASA response:

A. Regarding G-XLEA, currently reported having accumulated 28 000 FH since Airbus date of manufacture, the DET inspection as required by paragraph (1) of the AD must be accomplished before reaching 36 500 FH since Airbus date of manufacture, or within 7 months after AD effective date, whichever occurs first. EASA therefore does not agree with the commenter's statement that "given the current FH for the G-XLEA is 28 000FH, this means the inspection is to be carried out before 36 500FH" as also the 7 months calendar limit must be taken into account to identify when the one-time DET as required by paragraph (1) must be accomplished, which of the two events occurs first will depend on the aeroplane usage rate.

B. Comment partially agreed. In EASA view, the AD clearly specifies that, for Group 1 aeroplanes ONLY, a single DET is required by paragraph (1); thereafter, the next DET for Group 1 aeroplanes (which is also the initial DET for Group 2 aeroplanes; see Table 1) is required by paragraph (2), which also requires repetitive DET for both Group 1 and Group 2 aeroplanes. Nevertheless, the Final AD has been amended (Reason section and §1) to emphasize that there is a one-time inspection for Group 1 aeroplanes, prior to implementing repetitive inspections.

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

