

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-057

[Published on 26 April 2021 and officially closed for comments on 24 May 2021]

Commenter 1: Emirates – Mohamed El Basri – 02/05/2021

Comment # 1

Ref /A/: EASA PAD 21-057 (dated 26th April 2021)

Ref /B/: Airbus SB A380-57-8132 (RH Wing Tip) & SB A380-57-8133 (LH Wing Tip)

Ref /C/: Airbus SB A380-57-8145(LH Wing Tip) & SB A380-57-8146(RH Wing Tip)

Description: In 26th April 2021, EASA had published (PAD) 21-057 for consultation until 24 May 2021. This proposed PAD requires the modification of the wing tip assemblies in accordance Ref/B/ SBs (As applicable). Ref/A/ PAD is effective to All A380 Fleet Pre-Mod 76718 & 76719 and therefore should be modified as per Ref/B/ SB's.

However, review of Re/A/ PAD required actions / compliance is showing the following:

Post-SB A380-57-8145 (for LH wing) Within 7 years after SB A380-57-8145 embodiment

Post-SB A380-57-8146 (for RH wing) Within 7 years after SB A380-57-8146 embodiment

Pre-SB A380-57-8145 (for LH wing) & Pre-SB A380-57-8146 (for RH wing) Before exceeding 7 years since aeroplane date of manufacture

Action: And further to Emirates review, and due to the COVID19 world situation and aircrafts in a parking / Storage position, the PAD proposed compliance is not feasible for many affected A380 A/C's in our EK fleet. UAE would like EASA to review the above and adjust the expected AD compliance to meet 8 years since aeroplane date of manufacture or since SB A380-57-8145 /8146 embodiment (as applicable) OR with 1 Year Grace Period from EASA AD effective Date.

EASA response:

Comment not agreed. The compliance time specified in the AD has been defined, based on the risk assessment associated to the operation of wingtips manufactured from 7449 aluminium. Based on this, no grace period can be accommodated. Airbus can be contacted for further support and assistance.

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



Commenter 2: Air France – Mickaël Gorka – 11/05/2021**Comment # 2**

Regarding PAD 21-057, no grace period appears. AFR has aircrafts PRE SB A380-57-8145 & 46 which are more than 7 years old.
 Could you confirm us that a grace period will be introduced in the AD to apply the final fix (A380-57-8132/33)?

EASA response:

Comment not agreed. See EASA answer to Comment #1 above.

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

Commenter 3: British Airways – Jim Thomson – 19/05/2021**Comment # 3**

Until this PAD was issued, SBs A380-57-8132 and A380-57-8133 were recommended only, with a compliance time of “6 years from aircraft Entry Into Service (EIS) without exceeding 8 years from EIS for aircraft that had already passed their 6 years maintenance visit”. They also state that an AD was expected, but it was “anticipated that the AD will confirm the thresholds given”. On this basis, and owing to the Covid-19 pandemic, BAW elected to postpone the embodiment of these SBs on 2 a/c until the 8Y checks.

These 2 a/c have since passed their 6Y check maintenance input. If they are required to be embodied before 7 years, it will cause these large mods to fall outside the heavy check cycle.

Given that the applicable SBs previously allowed a/c which have passed their 6Y check to be embodied at 8 years, BAW requests that the AD be updated to include this grace period to prevent these mods being called as unscheduled maintenance outside a heavy check input.

EASA response:

Comment not agreed. See EASA answer to Comment #1 above.

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

