

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-078

[Published on 31 May 2021 and officially closed for comments on 28 June 2021]

Commenter 1: Emirates Airlines – Tarek Al Sabouni – 03/06/2021

Comment # 1

Ref. /1/: EASA PAD 21-078 (dated 31 May 2021)

Ref. /2/: Airbus SB A380-53-8215

On 31 May 2021, EASA had published (PAD) 21-078 for consultation until 28 June 2021. This proposed PAD requires the inspection of the rear fuselage structure geometry Ref/2/ SB. Ref/1/ PAD is applicable on three in-service aircraft with UAE (MSN: 009 - 0016 - 0017).

However, review of Ref/1/ PAD required actions / compliance is showing the following:

A: Before exceeding 4 200 flight cycles (FC) or 31 300 flight hours (FH), whichever occurs first since aeroplane date of manufacture.

B: Within 36 months after the effective date, but without exceeding 8 400 FC or 62 600 FH, whichever occurs first since aeroplane date of manufacture.

Further to Emirates review, all applicable MSNs have already exceeded compliance “A”. UAE would like EASA to review the above and adjust the expected AD compliance “B” to 8 800 FC in order to meet the 12-year C check grounding.

EASA response:

Comment partially agreed. The compliance times represent the outcome of a risk assessment. However, depending on new justification, SB and AD might be revised to refer to 8 800 FC instead of 8 400 FC.

At this time, no changes have been made to the Final AD in response to this comment.



notCommenter 2: Qantas Airways Limited – Wayne Nelson – 07/06/2021**Comment # 2**

Ref./1/ SB A380-53-8215 Rev00 dated 25 May 2021

Ref./2/ EASA PAD 21-078

Ref./3/ MSN 0014 & MSN 0015

QANTAS is currently reviewing the Ref./1/ SB and Ref./2/ PAD and we have some comments and queries regarding the requirements and intent.

QANTAS notes that requirement (1) of the PAD (i.e. the initial inspection in accordance with the Ref./1/ SB) is intended to confirm the existing geometry in the subject area and to report the findings. Requirements (2) & (3) specify new inspection Programs be adopted in the case of geometry B or C being found. However, there is no statement regarding what actions, if any, are required by the proposed AD if aircraft are found to be geometry A. According to the Ref./1/SB in the case of geometry A, operators should continue with ALI inspections at the intervals defined in the ALI.

- A. QANTAS believes there should be a termination statement in the AD in the case of Geometry A findings, with no further action required by the Ref./1/ SB or the Ref./2/ PAD.
- B. QANTAS has already carried out the existing ALI inspections on the Ref./3/ aircraft (with nil findings). Where the Ref./2/ PAD requirement (3) points to compliance times in the Ref./1/ SB for 'NEW' inspections that are to be carried out in accordance with the ALI, there should be a note that the threshold for the next inspection can be set from the last inspection.
- C. Also in relation to Requirement (3) Geometry C inspections (referenced below), QANTAS notes there is no grace period for the TH and both the Ref./3/ aircraft are already beyond the thresholds given. Either Ref./1/ or Ref./2/ need to include a grace period for the TH inspections for aircraft that are already beyond the times given in the SB:
 - A380-A-53-XX-8215-07ZZZ-300Z-A TH 4200 FC/31300 FH Int 3100 FC/23200 FH
 - A380-A-53-XX-8215-09ZZZ-300Z-A TH 4200 FC/31300 FH Int 3100 FC/23200 FH

NB: Given the MSN's applicable to the Ref./1/ SB, QANTAS would be surprised if any of these aircraft had not already exceeded the TH's given.
- D. In addition to the above comments, given that QANTAS has already been carrying out the existing ALI tasks, we would also appreciate confirmation that it is acceptable to perform the initial inspection (to determine the aircraft geometry) and launch the inspections as applicable (either Geometry A, B or C) at a later time provided they comply with the intervals specified?

EASA response:

A. Comment not agreed. This AD does not (need to) contain follow-on requirements for aircraft having geometry A, as they remain subject to existing ALS inspections, already required by existing EASA AD 2020-0232.

This new AD action is intended to specifically address the geometry B and C cases and have these inspected until corrected.

EASA only uses the wording ‘terminating action’ when repetitive actions (once started) can be stopped. For certain aircraft, only a one-time inspection is required to make the determination that they have a geometry A rear fuselage structure.

Follow-on actions are required ONLY for geometry B and C aircraft, as specified, therefore (by default) no follow-on actions are required for geometry A aircraft. According to EASA standards, an AD does not need to state what is not required.

B. Comment not agreed. The AD is clear about the thresholds (Table 1 – amended, see EASA answer to Comment #1 above) for the initial inspection, and refers to the SB (section E.1, Table 3) for the next inspection and interval(s) of the follow-on inspections, applicable only for those aircraft having geometry B or C, as determined by the first inspection.

It should be noted that the existing ALI tasks (previously accomplished, as the commenter states) were not for the purpose of identifying the rear fuselage structural geometry. Consequently, there is no need (retrospectively) to record those previous actions as ‘credit’ for, and ‘compliance’ with, the initial inspection as required by paragraph (1) of this new AD.

An inspection interval, by its very nature, always means that the next inspection is due within that interval since the last inspection. As it is believed that this is commonly understood, EASA see no need to make this explicit in the AD.

If in future, it is found that widespread uncertainty or confusion does exist on this aspect, EASA may reconsider and revise the AD.

C. Comment partially agreed. See EASA answer to Comment #1 above.

Any follow-up inspections are required from the initial (i.e. geometry identification) inspection, for which the AD provides a ‘grace period’ – see Table 1 of the AD, under ‘B’.

According to information provided by Airbus to EASA, no aircraft in the fleet has exceeded either 8 400 FC or 62 600 FH.

D. Comment partially agreed. See EASA answer to Comment #1 above; and EASA answers to Points B and C above.

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

