

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-093R2

[Published on 20 July 2021 and officially closed for comments on 30 July 2021]

### Commenter 1: Eastern Airlines Technic – Zhao Qijun – 19/07/2021

#### Comment # 1

CES has some questions about the PAD 21-093R1 need EASA to explain. In paragraph 2 of the Required Action(s) and Compliance Time(s), For a Group 1 aircraft that, at any time after the effective date of this AD, is parked or stored for a period of 30 days or more, before next flight inspect each affected part in accordance with the instructions of paragraph 3.2 of the VSB.

CES would like to know whether the inspection before the next flight will need to be performed if the Repetitive Inspection is performed as required by paragraph 1 for these aircraft which are applicable to paragraph 2? In other words, as long as the Group 1 aircraft has been parked or stored for more than 30 days, the inspection before the next flight is required.

#### EASA response:

**Comment noted. It is confirmed that the inspection is required before release to service after each period of parking or storage of 30 days or more, regardless of when the last inspection was accomplished, to replace extinguishers that may have become inoperative during that parking or storage period. After the inspection upon release to service of the aircraft, the next inspection will be due within 6 months.**

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

### Commenter 2: Eastern Airlines Technic – LI Xingyang – 23/07/2021

#### Comment # 2

Repetitive Inspections:

(2) For a Group 1 aircraft that, at any time after the effective date of this AD, is parked or stored for a period of 30 days or more, before next flight inspect each affected part in accordance with the instructions of paragraph 3.2 of the VSB, or equivalent maintenance instructions issued by the design (change) approval holder. Thereafter, inspect each affected part on that aircraft as required by paragraph (1) of this AD.



**Recommendation:**

For A350 aircraft, the inspection requirement should be added in the <Parking and Storage Procedure-A350-A-10-1X-XX-00001-170A-A> and <Storage Periodic Ground Checks-A350-A-10-31-XX-05001-282A-A> by Airbus, and the Repetitive Inspections paragraph (2) should be deleted.

**EASA response:**

***Comment not agreed. The PAD states to “[...] inspect each affected fire extinguisher in accordance with the instructions of paragraph 3.2.C of the VSB, or equivalent maintenance instructions issued by the design (change) approval holder.” An operator can certify the inspection in accordance with the VSB if no AMM task yet exists.***

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

**Commenter 3: Japan Airlines – Hiroshi Ishikawa – 26/07/2021**
**Comment # 3**

According to PAD 21-093R2, the future AD will require inspection in accordance with the instructions of paragraph 3.2.C of the VSB issue B or later. As VSB paragraph 3.2.C.6 requires reporting the results to umlaut and design holder, we would like to confirm if paragraph 3.2.C.6 is including as a part of inspection or not.

If paragraph 3.2.C.6 is assumed as a part of inspection, we have to report the inspection results as a part of inspection before sign-off the aircraft log including AD accomplishment record before next flight.

Since the inspection results are reported by a different person from maintenance engineer, it may take several days depending on the day and time of the inspection at least. Therefore, it is requested to confirm that the reporting per paragraph 3.2.C.6 is not included in the part of inspection per paragraph 3.2.C or that there is no problem in the reporting at a later date.

**EASA response:**

***Comment agreed. Reporting of inspection results is not required, but a Note has been added to the Final AD for clarification.***



**Commenter 4: Airbus – Nicolas Charnay – 30/07/2021****Comment # 4**

For our aircrafts we don't have expositions during operations or parking to high temperatures.

When we follow the decision tree of the VSB we have the step "temperature history" of the equipment.

Do we have to take into account in the temperature history :

- The history before delivery of the aircraft for the extinguisher delivered with the aircraft
- The history of the transport for the spares parts?

If yes, for the next inspection do we have to reply again that we have a doubt for the temperature history or can we consider that we don't need to perform the inspection?

**EASA response:**

***Comment not agreed. The AD requires inspection of all affected parts (P/Ns as listed in the Applicability) in accordance with paragraph 3.2.C of the VSB. EASA has determined that it is not possible for an operator to determine the environmental conditions an extinguisher has been exposed to, and so the AD actions are not linked to temperature and duration of exposure. Where the AD deviates from the VSB instructions, the AD requirements take legal precedence.***

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

**Commenter 5: Airbus – Michael Bielenberg – 30/07/2021****Comment # 5**

A. Repetitive Inspections: Airbus propose the first inspection to be done within 90 days (not within 30 days) to give operators more flexibility in planning the inspection and subsequent actions (i.e. replacement by alternative part numbers). Due to the extreme prerequisites for this failure scenario (i.e. > 70°C for more than 288 hours / corresponding to 3 months in operation) it is not expected to get a high amount of findings.

This is further supported by the fact that Airbus did not receive any reports of this failure case since the affected p/n's were delivered into service (Nov 2016).



B. Terminating Action: Based on several comments Airbus propose to add a note or reference for clarification, that alternative part numbers are existing to terminate this AD.

***EASA response:***

***A. Comment not agreed. The unsafe condition is a latent failure which could affect all extinguishers on an aircraft at the same time, and it is not known how many individual aircraft may have been already affected. Therefore EASA has to be conservative for the initial inspection. Further, there will not be any reports of this failure case unless an operator has tried to use an affected extinguisher and the extinguisher has failed to operate.***

***B. Comment agreed. Although the inspections in the AD are only required for the affected part numbers, a Note has been added in the final AD to provide further clarification.***

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

