

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-108

[Published on 27 July 2021 and officially closed for comments on 24 August 2021]

Since PAD 21-108 was issued, it was realised that only pre-mod aeroplanes are affected by the unsafe condition. In addition, as any new MMEL item results in less restrictive aeroplane operation, there is no need (safety or otherwise) to require implementation of such items by AD. Operators are anyway expected to introduce these approved MMEL items into their MEL, as they provide relief for a situation that would otherwise be 'NO GO'.

The Applicability and Table 1 of the Final AD have been amended accordingly.

**Commenter 1: All Nippon Airways – Takaaki Ohnishi – 11/08/2021**

### Comment # 1

REF/A/ EASA PAD No. 21-108 "ATA 28 – Fuel – Master Minimum Equipment List – Fuel Pumps – Amendment"

REF/B/ Airbus Technical Request No. 80951354/003 (copy provided to EASA)

#### ===Description

ANA reviewed REF/A/ PAD, and contacted Airbus for ANA's Master MEL detail. According to REF/B/ [see extract below], depending on A380 operator's aircraft configuration, some A380 operators need to revise (amend) their company MEL, and others do not need to revise (amend) their company MEL. Therefore ANA requests EASA to change the wording in the coming AD as below.

#### Extract of Airbus answer:

The items 28-26-06-Feed Tank 1 Main Pump and 28-26-15 - Feed Tank 4 Standby Pump are modified in January 2021 MMEL Revision (REF/B/) only for aircraft equipped with fuel pipes prone to corrosion, that is to say aircraft with none of the following MODs embodied:

- MOD 75900 / MP T76219 - FUEL - INTRODUCE MODIFIED FUEL PIPES WITH INCREASED ANGULATION CAPABILITY OF THE PIPE END FITTINGS - FEED.
- MOD 76287 / MP T76222 - FUEL - ENG FEED FUEL PUMP SYS-INTRODUCE REVISED FUEL PIPE END FITTING TO PROVIDE INCREASED ANGULATION (SB ONLY).
- MOD 76292 / MP T76247 - FUEL - ENGINE FEED FUEL PUMP SYSTEM - ADAPT FUEL PIPE INSTALLS WITH NEW PIPES WITH INCREASED ANGULATION END FITTINGS.

ANA fleet has the improved fuel pipes, therefore ANA MEL does not show any change of the item 28-26-06-Feed Tank 1 Main Pump and item 28-26-15 - Feed Tank 4 Standby Pump.

#### ===ANA's comment and request



Please change the sentences below in the coming AD.

\*\*\*\*\*Existing PAD No.21-108\*\*\*\*\*

MMEL Changes:

(1) Within 3 months after the effective date of this AD, amend the MEL on the basis of the MMEL update, as defined in this AD, inform all flight crews, and, thereafter, operate the aeroplane accordingly.

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\*\*\*\*\*ANA's proposed sentences\*\*\*\*\***(red text is added)**

MMEL Changes:

(1) Within 3 months after the effective date of this AD, amend the MEL **or ensure the MEL updated** on the basis of the MMEL update, as defined in this AD, inform all flight crews, and, thereafter, operate the aeroplane accordingly.

***EASA response:***

***Comment agreed. The Final AD has been amended to reduce the Applicability by excluding post-mod aeroplanes (i.e. those with mod 75900 or mod 76292 embodied) and post-SB A380-28-8050 aeroplanes.***

