

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-157

[Published on 15 October 2021 and officially closed for comments on 12 November 2021]

Commenter 1: British Airways Plc – Tom Offord – 15/10/2021

Comment # 1

British Airways have reviewed EASA PAD 21-157 and believe that currently the available technical documentation does not allow us to comply with this AD on aircraft which have part number 4785A0000-04 installed from delivery, without production MOD 112379. PAD 21-157 states that affected aircraft are aircraft with part number 4785A0000-04 and 4785A0000-05 installed and that operators must “replace each affected part with a serviceable part, as defined in this AD, in accordance with the instructions of the SB.”

The instructions of SB A350-27-P055 does not allow the on-wing modification from a -04 to a -06 standard of PCU, only aircraft which are post-MOD 112379. As a result BAW cannot replace each affected part with a serviceable part, in accordance with the instructions of the SB A350-27-P055 if the affected part is 4785A0000-04 .

Can EASA please work with Airbus to ensure there is a way for operators with -04 standard PCU installed on aircraft to modify their aircraft to the -06 standard?

EASA response: Comment agreed.

Since the publication of EASA PAD 21-157 Airbus issued Service Bulletin Information Transmission (SBIT) 21-0048 (Rev00) dated 07 December 2021 , which makes reference to SB A350-27-P055 REV 00, and does not allow the replacement of -04 part with -06 part. For airlines who wish to embody Ref.1 SB for their aircraft with Pre-MOD slat PCU P/N 4785A0000-04 installed and before availability of Ref.1 SB revision, please contact Airbus Standard Service Bulletins for support (refer to Paragraph 5. CONTACTS of this SBIT).

The Final AD has been amended accordingly.

Commenter 2: Ameco – Guo Jianglong – 18/10/2021**Comment # 2**

"For Group 1 aeroplanes: Within 18 months after the effective date of this AD, replace each affected part with a serviceable part, as defined in this AD, in accordance with the instructions of the SB."

There are 15 aircraft in total affected in the CCA A350 fleet and belong to Group 1 in this PAD.

As for the Airbus SB A350-27-P055 accomplishment, the supplier LIEBHERR informed that there is no more FOC loan unit of the new PCU P/N 4785A0000-06 available at present and the FOC loan units are coordinated by Airbus. As AOT A27P016-20 R02 is now executed concurrently, only one spare part PCU P/N: 4785A0000-04 or -05 can be sent to upgrade at a time. And it takes about 45 days to update the PCU P/N 4785A0000-04/05 to 4785A0000-06, from delivery of old part to receipt of new part, which means that it may take about 30 months for CCA A350 fleet to complete the Airbus SB A350-27-P055 modification.



SB_27-P055_r00.pdf

Please review above information and advise if it can be taken into consideration to extend the deadline of Terminating Action to 30 months after the effective date of this AD?

EASA response: Comment not agreed.

The compliance time is calculated based on the risk to the fleet. No changes have been made to the Final AD in response to this comment.

Commenter 3: Cathay Pacific – Alfred Lee – 28/10/2021**Comment # 3**

1. For para (6) Modification/Replacement: understood that the PCU -06 can be installed by performing SB 27-P055 but the PCU can also be installed per AIPC without doing the SB (for example, existing PCU -05 found defect during line maintenance, and new spare PCU -06 being installed per AIPC as part replacement). Hence, is the PCU -06 installation per AIPC constituted a compliance to AD para (6) ? Note that the end result is the same (-06 installed) but just using different mean (by AIPC instead of SB).



2. For Ref. Publications: the SB should read as 27-**P055** not P035.

EASA response:

1. Comment not agreed. The AIPC shows which parts can be installed, but does not provide the authority to modify the aircraft. No changes have been made to the Final AD in response to this comment.

2. Comment agreed. The Final AD has been amended accordingly.

Commenter 4: British Airways Plc – Tom Offord – 04/11/2021

Comment # 4

After further review of PAD 21-157 BAW request further clarification. On multiple occasions the PAD states:

“Modification of an aeroplane as required by paragraph (6) of this AD constitutes terminating action for the repetitive health checks as required by paragraph (4) of this AD for that aeroplane.”

It also states that a DET of LH and RH slat transmission systems is only required for Group 1 aeroplanes. However, the PAD does not make it clear that the requirement for a detailed inspection is also terminated by the modification. Can you please amend the wording of the PAD to make it clear if the modification terminates both the Detailed inspection and the repetitive health checks or just the Health Checks.

EASA response: Comment not agreed.

The replacement of the affected parts as required by paragraph (6) does not negate the one off DET required by paragraph (1). No changes have been made to the Final AD in response to this comment.



Commenter 5: Singapore Airlines Limited – Abel Li – 12/11/2021**Comment # 5**

1. The PAD 21-157 defines an “affected part” as a pre-mod Slat PCU having P/N 4785A000-04 or P/N 4785A000-05, and a serviceable part as post-mod Slat PCU P/N 4785A000-06.
Airbus SB A350-27-P055 makes reference to Liebherr SB 4785A-27-04 Rev 1, which can be applied to upgrade the slat PCU from P/N 4785A000-05 to P/N 4785A000-06.
There is no Airbus SB available to upgrade the Slat PCU from P/N 4785A000-04 to P/N 4785A000-06, and consequently no Industry Support available for Operators to seek remedy from either Airbus or Liebherr for a mandatory and costly task. SIA’s request is for EASA to include an Airbus SB to permit a direct modification from P/N 4785A000-04 to P/N 4785A000-06, at no cost to Operators.
2. As the largest A350-900 Operator in the world as of date of writing, SIA has a mix of P/N 4785A000-04 and P/N 4785A000-05 in the fleet. By not replacing the pre-mod Slat PCUs, SIA continues to incur maintenance burden, high costs, and unnecessary ground time when required to perform the repetitive inspections per AD 2021-0053R1. SIA’s request is to have Industry Support from Airbus and Liebherr for the modification of affected P/Ns 4785A000-04 and 4785A000-05.
3. Additionally, there is a worldwide limitation on the Liebherr health check tool, which poses a maintenance burden on Operators when we have to perform the repetitive inspections on a growing fleet coupled with absence the tool when it is sent back to overseas shop for calibration (with lead time / shipping delays factored, more so in this current pandemic). SIA’s intent is to expedite the modification of Slat PCUs to P/N 4785A000-06 so as to terminate the repetitive inspections as required in AD 2021-0053R1 (which will be superseded by the new AD).

EASA response: Comment agreed.

See EASA answers to Comment #1 above.

