

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-165

[Published on 09 November 2021 and officially closed for comments on 07 December 2021]

**Commenter 1: Qatar Airways – Muhammad Asad Khan – 10/11/2021**

### Comment # 1

This is in reference with EASA PAD 21-165, which gives following definitions:

**Affected part:** Aileron servo controls, having Part Number (P/N) 31132-130 or P/N 31132-170, as identified by s/n in the VSB (in-service mod 75534) or Aileron servo controls fitted through Airbus production line mod 75388.

**The SB:** Airbus A380-27-8071 (only issued to identify affected s/n physically) and SB A380-27-8072 (removal of affected parts for in-shop correction and installation of serviceable parts).

#### Desired Action:

Since Aileron SC P/N & s/n are already indicated in the Aircraft Equipment List and in-service P/N & s/n transaction/ installation details are traced through Airline ERP system. Therefore affected s/n identification through aircraft records is possible as an alternate acceptable to Airbus A380-27-8071.

EASA is requested to include the review of aircraft record as an alternate to Airbus A380-27-8071 (only issued to identify affected s/n physically).

#### EASA response:

**Comment partially agreed. Note that the AD requires only the action to “remove that affected part from service and replace it with a serviceable part”. Since the AD does not explicitly require any inspection or identification (in fact, it is assumed operators are aware of P/N and s/n installed), there are different methods of inspection and identification (if necessary).**

**The Final AD has been amended in response to this comment by replacing the (erroneous) heading “Inspection” of paragraph (1) by ‘Replacement’ and by inserting a new Note 1 for clarification.**



**Commenter 2: Qantas Airways Limited – Tomo Sugano – 18/11/2021****Comment # 2****References**

Ref [A] EASA PAD 21-165 issued on 9 November 2021

Ref [B] Inspection SB A380-27-8071 Revision 00 issued on 18 October 2021

Ref [C] Modification SB A380-27-8072 Revision 00 issued on 18 October 2021

Ref [D] VSB 31132-27-07 Revision 00 issued on 8 October 2021

Ref [E] Airbus Technical Request Dossier ref 80984331 dated 17 November 2021 (Airbus proprietary)

With regard to Ref [A] PAD (hereinafter referred to as the PAD), Qantas Airways would like to consult EASA on the following:

The PAD defines 'Affected Parts' as aileron servo controls, having Part Number (P/N) 31132-130 or P/N 31132-170, as identified by Serial Number (S/N) in Ref [D] VSB. The proposed AD Inspection (for affected servo control S/N's by the VSB) and removal of affected servo control S/N's are mandated by PAD Para (1) in accordance with the instructions of the (related) SB, which collectively refers to Refs [B] and [C] Airbus SB's pertaining to the identification and the removal of the affected servo control S/N's, respectively. Ref [B] inspection SB does not provide for the check of servo control S/N's via means other than physical inspection, for which Qantas corresponded with Airbus via Ref [E] communication.

At Qantas, we rely on an electronic Maintenance Information System (MIS) to track the identities of component inventory, including the P/N and S/N information of the aileron servo controls affected by the PAD. The use of the MIS has been continuously approved by our National Aviation Authority (NAA), namely CASA of Australia, since the commencement of the Qantas A380 fleet operation. Qantas has since received correspondence from Airbus via Ref [E] communication recommending that we redirect our inquiry to EASA for the inclusion of operator eligibility for complying with Ref [B] inspection SB and thereby (partially) complying with PAD Para (1) via review of maintenance records.

Unless the forthcoming AD (to be released after PAD consultation) explicitly provides for the eligibility for the identification of the affected servo control units by way of the review of maintenance records (or MIS data in the case of Qantas) in lieu of physical inspection, our aviation maintenance technicians would be unnecessarily subjected to personnel safety hazards while working at heights. For Qantas, the physical inspection of servocontrol P/N and S/N's on wing is without merit, as our MIS continuously tracks the same information electronically and we are already fully aware of the units and installation positions and parent aircraft thereof that require to be removed and replaced with serviceable units in accordance with Ref [C] modification SB.

**EASA response:**

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



**Commenter 3: Qatar Airways – Muhammad Asad Khan – 18/11/2021**

**Comment # 3**

QTR appreciate EASA's acknowledgement. In addition to our earlier email dated 10-Nov-2021, further review has raised following additional comments:

This EASA PAD provide following definition for serviceable Part:

- A. **Serviceable part:** Aileron servo controls, having P/N 31132-140 or P/N 31132-180. QTR understand from the **Affected part** definition that S/Ns not included in **the VSB 31132-27-07** are not affected. Hence those unaffected S/Ns shall be considered as **Serviceable part** along with upgraded P/N 31132-140 or P/N 31132-180.
- B. This EASA PAD restrict **Part(s) Installation** from the AD effective date. Such mandate will impose a challenge to upgrade the affected Parts in stock prior to the effective date of this AD. From Operators perspective such restrictions should be applicable from date of modification on respective airplane.

**EASA response:**

- A. *Comment not agreed. The component SB contains a full list of s/n, which means that all aileron servo controls, having P/N 31132-130 or P/N 31132-170, are 'affected parts'.*
- B. *Comment agreed. Paragraph (2) of the Final AD has been amended and the related Note 1 has been removed accordingly.*

**Commenter 4: ALL NIPPON AIRWAYS CO.,LTD. – Kyohei Takamizawa – 18/11/2021**

**Comment # 4**

I am writing to ask you a question about the following Proposed AD and associated SB.

REF /A/: PAD 21-165

REF/ B/: SB A380-27-8071, Inspection SB for the PN of Aileron SC



**Description:** As I reviewed REF/B/, the SB instructs to check the P/Ns in the Aircraft. However REF/A/ does not state the method to inspect. I believe the Delivery Documents, such as the Aircraft Inspection Report, provided by AIRBUS and our maintenance history record is adequate information to identify whether the P/N is equipped or not.

**Question/Request:** Is it acceptable for EASA to identify the P/N by the delivery document and our maintenance record, without the inspection in accordance with REF/B/? If yes, ANA would like EASA to add into the AD that P/N identification by the delivery document and the maintenance record is acceptable.

***EASA response:***

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

