

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-183

[Published on 20 December 2021 and officially closed for comments on 17 January 2022]

Commenter 1: Cathay Pacific – Joe Chu – 21/12/21

Comment # 1

AHK A300 only have GP 2 PN installed.

Ref PAD Para (2),

Table 3 – Group 2 Affected Parts – Initial DET / ETM

Compliance Time (whichever occurs later, A or B)	
A	Within 800 FH or 4 months, whichever occurs first after the effective date of this AD
B	Before exceeding 800 FH or 4 months, whichever occurs first since the date of first installation

The compliance time is within 800FH or 4 months whichever occurs first after the **effective date of this AD.**

SB-56-6007 specified the initial inspection within 800FH or 4 months whichever occurs first after the **D0 of the original SB release date, which is 19NOV2021,** for the windshield without unknown maintenance history or had history of L/R windshield heat ECAM message.

AHK would expect that the effective date of the AD will be later than D0 of the SB and therefore the compliance time for the initial inspection would be extended beyond 19MAR2022 if calendar day count occur first. Is this anticipation correct?

EASA response:

Comment noted. The ‘effective date of the AD’ will be determined at the time of AD publication. In addition, any AD is always published later than its associated technical references.

Finally, in case of discrepancies between Service Bulletin and AD, the AD information takes precedence.

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



Commenter 2: Cathay Pacific – Winggo Ng – 04/01/22

Comment # 2

In PAD 21-183, there is no dedicated “Credit” paragraph.

As the associated SBs were issued in Nov 2021, the initial inspections might have already been completed before the effective date of AD.

For any Groups to follow compliance time “A” or “B” in the PAD/AD, does it mean that, those initially inspected by the SBs will have to be inspected again within “A” or “B” regardless of previous results?

Or will EASA consider to create a dedicated “Credit” paragraph to explain?

EASA response:

Comment noted. The AD states “Required Action(s) and Compliance Time(s): Required as indicated, unless accomplished previously”. Any actions, accomplished before the effective date of the AD using the same instructions (i.e. SB issue) as required by the AD are acceptable to demonstrate compliance with the AD requirements. If the initial inspection has been accomplished before the AD effective date, the next inspection is due at the applicable interval as specified in the AD.

Note that a Credit paragraph usually supports actions different from the actions required by the AD.

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

Commenter 2: Deutsche Lufthansa AG – Walter Press – 05/01/22

Comment # 2

Paragraph (3):

(3) For Group A aeroplanes: The initial DET followed by ETM, as required by paragraph (2) of this AD can be postponed to the special compliance times specified in Table 4 of this AD, provided the conditions specified in Table 4 of this AD are met.

Despite, that the table 4 has the header “Table 4 – Group 2 Affected Parts – Initial DET / ETM” could you please identify in the text that only Group 2 windshields are affected by this relaxation only, this may give more clarity:



Proposal for Paragraph (3):

(3) For Group A aeroplanes: The initial DET followed by ETM, as required by paragraph (2) of this AD can be postponed **of each group 2 affected part** to the special compliance times specified in Table 4 of this AD, provided the conditions specified in Table 4 of this AD are met.

Paragraph (4), (6), (7) and (9):

(4) If, during any ETM as required by paragraph (2) of this AD, the results are found to be in the “amber area”, as identified in the SB, accomplish subsequent DET and ETM of that affected part at intervals not exceeding 800 FH or 4 months, whichever occurs first.

Within paragraph (3), a postponement of the DET/ETM inspection was allowed and therefore you should respect this relaxation in paragraph (4) also:

Proposal for Paragraph (4):

(4) If, during any ETM as required by paragraph (2) **or (3)** of this AD, the results are found to be in the “amber area”, as identified in the SB, accomplish subsequent DET and ETM of that affected part at intervals not exceeding 800 FH or 4 months, whichever occurs first.

The same applies to paragraph (6), (7) and (9), and the results of paragraph (4) needs to be taken into account.

(6) If, during any DET as required by paragraph (1), (2), **(3)** or (5) of this AD, as applicable, any defect, as identified in the SB, is found on an affected part, before next flight, replace that affected part with a serviceable part in accordance with the instructions of the SB.

(7) If, during any ETM as required by paragraph (1), (2), **(3) or (4)** of this AD, as applicable, the results are found to be in the “red area”, as identified in the SB, before next flight, replace that affected part with a serviceable part in accordance with the instructions of the SB.

(9) For Group A aeroplanes: Replacement on an aeroplane of each affected part with a windshield having a P/N not affected by the requirements of this AD constitutes terminating action for the repetitive inspections as required by paragraphs (1), (2), (3), (4) and (5) of this AD, as applicable for that aeroplane, provided that, following that replacement, no affected part is installed on that aeroplane.

Reporting paragraph (11), (12):

All operators understand that the reporting of the inspection results is crucial for this inspection program in order to manage the spare part situation within Airbus and SAINT-GOBAIN SULLY.

However, the integration of the reporting requirements within the Airworthiness Directive results in an extra maintenance burden for the operators, since the compliance time of each report needs also to be monitored, nowadays. Due to the relation with the retrofit program of SGS and Airbus (RIL LR56M21001080 as well as the limited spare situation, we are confident that Airbus/SGS will get the inspection results in timely manners even when a strict reporting will not be highlighted in the AD. Therefore, we propose to relax the AD requirements of the reporting and recommend to delete both paragraphs (11) and (12).



Furthermore, the reporting time frame of 90 days (three months) for the repetitive inspections seems not be well adjusted due to the very low inspection interval of 800 FH and 4 months (for group 1, group 2 with “amber” TSM inspection result and group 3 windshields). From an organizational point of view, there is now reason to differ between the first and repetitive inspection since both can affect the inspection campaign on the complete A330/A340 fleet. At a global view, we assume that due to different aircraft operation and staggering of the inspection an overlapping of first and second inspections could occur fleet-wide. In the event that EASA insists on the reporting requirement, we propose to combine paragraph 11 and 12 together in one paragraph. As previously noted, we would like to emphasize that the report itself does not establish the airworthiness of the aircraft.

EASA response:

Comments on paragraphs (3), (4), (6), (7) and (9) agreed.

Paragraph (3) has been amended in the final AD as follows:

- *The initial DET followed by ETM of each Group 2 affected part, as required by paragraph (2) of this AD, can be postponed to the special compliance times specified in Table 4 of this AD, provided the conditions specified in Table 4 of this AD are met.*

Paragraph (4), (6), (7) and (9) have been amended in the final AD as follows:

- *Paragraph (4): If, during any ETM as required by paragraph (2) or (3) of this AD, as applicable, the results are [...]*
- *Paragraph (6): If, during any DET as required by paragraph (1), (2), (3) or (5) of this AD, as applicable, any defect [...]*
- *Paragraph (7): If, during any ETM as required by paragraph (1), (2) or (3) of this AD, as applicable, the results are [...]*
- *Paragraph (9): [...] constitutes terminating action for the repetitive inspections as required by paragraphs (1), (2), (3), (4) and (5) of this AD, as applicable for that aeroplane, provided that [...]*

Note that paragraph (3) does not actually require an action, but provides an optional deviating compliance time for the actions required by paragraph (2). The wording “as required by” is used in this AD also for paragraph (3) in order to simplify the text.

Comments on paragraphs (11) and (12) are disagreed.

Reporting paragraphs (11) and (12) are deemed necessary to organise the logistics for maximising the Ground Support Equipment availability and the reporting timeframes adequate considering the risk. No changes have been made to the final AD in response to this comment.

