

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-004

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Commenter 1: Japan Airlines – Hiroshi Ishikawa – 03/02/2022

Comment # 1

Paragraph (1) of the referenced PAD requires that "Within 30 days after the effective date of this AD", operator should amend the operator's MEL on the basis of MMEL update. But this cannot be done at this stage because the contents of MMEL and referenced Maintenance Procedures are insufficient as follows:

- A. The MMEL 36-22-01C and MMEL 36-22-01D refer to the Maintenance Procedure (MP) xx-xx-xx-xx-xxx, but Airbus A350 Line Maintenance (LM) 01 JAN 2022 revision does not yet have an MP task set for these MMEL items.
- B. In relation to MMEL, Airbus published MP task A350-A-36-22-XX-06001-560A-A on LM 01 JAN 2022, but this MP task is not usable as it incorrectly references MMEL 36-22-01B, as well as some errors and issues. JAL received a response from Airbus stating that "The MP task A350-A-36-22-XX-06001-560A-A is not relevant, and should not have been published. It creates conflict and it should be disturbed so far. ".
- C. And since the MMEL does not specify the MP and associated MPs have not been issued, an insufficient revision of the operator's MEL from these resources will not be accepted by the JCAB, local authority in Japan. At a minimum, the amendment of the operator's MEL should be deferred until the referenced MPs have been issued and MMEL reflects the correct MP task numbers.
- D. If EASA cannot postpone issuing AD and revised MMEL, please consider for include alternative actions into the AD that can be reflected in operator's MEL.

EASA response:

EASA recognises the current maintenance actions for the referenced MMEL items has not yet been published. Airbus plans to create the maintenance procedure and reference it in the MMEL as soon as possible. Nevertheless, as it is important to ensure the new MMEL restrictions are put in place in a timely manner to reduce the risk of operations with an undetected leak, if an operator wishes to make use of the referenced MMEL items before they are amended, the operator should contact Airbus for the necessary maintenance instructions, as described in Airbus FOT 999.0023/21 and OIT 999.0061/21. The final AD has been updated to include a clarification.

