

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-007

[Published on 26 January 2022 and officially closed for comments on 23 February 2022]

Commenter 1: Qantas Airways Limited – Tomo Sugano – 28/01/2022

Comment # 1

References:

Ref [A] EASA PAD 22-007 issued on 26 January 2022

Ref [B] Inspection SB A330-32-3302 Revision 00 issued on 18 January 2022

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 an 'Affected Part' as "Nose landing gear (NLG) and main landing gear (MLG) main fittings, and MLG sliding pistons, having a Part Number and a serial number listed in the (Ref [B]) SB".

Ref [B] inspection SB does not provide for the check for affected serial numbers via means other than physical inspection, for which Qantas would like EASA to provide a written clarification [most suitably at AD Para (1)] in the final AD being published that a maintenance records check is also an acceptable method to identify affected serial numbers for the purpose of AD compliance. The following Note was previously appended by EASA to an unrelated (namely AD 2021-0285) as a result of PAD CRD correspondence.

"Note: Airbus SB [reference of the related SB] provides a method to identify affected parts, but a maintenance records check is also acceptable, provided such records are accurate and complete and can be relied upon for the purpose of identification. Any method of identification remains subject to agreement by the competent authority."

EASA response:

Comment noted: Paragraph (1) of the AD requires replacement of affected parts before exceeding the revised life limit; there is no requirement to inspect the part to determine its P/N and s/n. Furthermore, there is no reference to the SB instructions to inspect and replace the part, as there was in EASA AD 2021-0285.

The definition of "affected part" does not refer to a part inspection.

More in general, while in the past certain ADs positively required to inspect the part to identify its P/N and s/n (e.g., AD 2017-0185), current EASA



practice is not to specify any method to determine whether a part is affected. Consequently, any method, which is acceptable to the NAA responsible for AD enforcing, is acceptable. No changes have been made to the Final AD in response to this comment.

Commenter 2: Individual Contributor – Dave Edward P. Jandusay – 02/02/2022

Comment # 2

- A. Paragraph (1) requires replacement of the affected part before exceeding the applicable revised life limit, as published in the SB, or within 3 months after the effective date of this AD, whichever occurs later.
- a. As the compliance time is the latter of the two limits (LL or Calendar), there is a potential for affected parts to be operated beyond their life limits but within the 3-month period after the AD Effective Date. For example, an affected part with reduced life limit of XXXX landings and YYYY hours would have reached said XXXX landings and YYY hours in 2 months, but if it is replaced within 2.5 months (still below the 3-month period), the intent of the AD is defeated.
 - b. Hence it may be pragmatic to remove the calendar limit, or change it to a longer limit together with a “whichever comes first” threshold: before exceeding the applicable revised life limit, as published in the SB, or within XX months after the effective date of this AD, whichever occurs first, albeit this would be more stringent.
 - c. Or, the 3-month (or shorter) duration may be used as compliance interval for the identification of PN & SN of the parts installed on aircraft (with a Note “A review of maintenance records can be done in lieu of the inspection provided the part number and serial number of the main fittings and sliding pistons can be conclusively determined from that review” – especially that these components may be removed and installed across different aircraft.) – and to replace the affected part before exceeding the applicable revised life limit, as published in the SB.
- B. As this PAD also relates to the Airworthiness Limitation Section, should this be correlated with EASA AD 2021-0246, especially for Paragraphs 3 & 4 when installing affected parts which are repaired and/or considered serviceable (reduced life limit not exceeded)?

EASA response:

Comment 2A) Comment noted. In general, it should be noted that, even when a life limit is reduced in the ALS, a so-called “grace period” (or “compliance time”, as defined in the Airbus ALS documents) is allowed to avoid unnecessary grounding of aeroplanes, provided this is supported by available data. The life limit as published in the ALS already takes into account safety margins. For this specific case, according to available data, all affected parts are well below the reduced life limit.



Comment 2B) This AD addresses a limited batch of parts only, manufactured with improper material and/or using deviating manufacturing processes, while the ALS is typically addressing life limits applicable to parts not affected by deviations. The requirements of EASA AD 2021-0246 remain applicable to all parts having a P/N listed in the ALS: this new AD is not superseding AD 2021-0246.

No changes have been made to the Final AD in response to these comments.

Commenter 3: American Airlines – Neil Gary – 04/02/2022

Comment # 3

American Airlines (AAL) does not see any provision in EASA PAD 22-007 or Airbus SB A330-32-3302 to allow for a maintenance records review to determine if an affected part is installed or held in the airline's inventory. Typically in cases like this, a maintenance records review is acceptable, provided an accurate identification of affected and non-affected parts can be made. For example, EASA PAD 17-028R1, dated 22 August 2017, contains this language under Required Action(s) and Compliance Times(s), Part Identification, Para. (1). AAL requests that similar language be added before the final rule is published for this proposed AD.

References:

/A/ EASA PAD No. 22-007

/B/ Airbus Service Bulletin (SB) A330-32-3302, Rev 00, Dated Jan 18, 2022

/C/ EASA PAD No. 17-028R1, Dated 22 August, 2017

EASA PAD 22-007 (Ref. /A/) proposes a new AD to mandate inspection of the part number (PN) and serial number (SN) on the enhanced main landing gear (MLG) main fittings, enhanced MLG sliding pistons and nose landing gear (NLG) main fittings and to revise the airworthiness limitations as applicable for the affected PN and SN listed in Airbus Service Bulletin A330-32-3302 (Ref. /B/).

In response to Ref. /A/, American Airlines provides the following comments:

American Airlines (AAL) does not see any provision in Ref /A/ EASA PAD 22-007 or Ref /B/ Airbus SB A330-32-3302 to allow for a maintenance records review to determine if an affected part is installed or held in the airline's inventory.

Typically, in cases like this, a maintenance records review is acceptable for identification of the parts, provided the PN and SN of each component can be conclusively identified by that review. For example, EASA PAD 17-028R1, dated 22 August 2017, (Ref /C/) contains this language under Required Action(s) and Compliance Times(s), Part Identification, Para. (1).

AAL requests that similar language be added to the Ref /A/ proposed AD before the final rule is published.



EASA response:

Comment noted – see EASA answer to Comment 1

Commenter 4: Cathay Pacific – Bharat Yadav – 07/02/2022

Comment # 4

Why are ADs being issued for variations to the published ALS lives? The ALS variation should be issued rather than an AD. By issuing a AD there is no connection with the published ALS and AD, as neither is the AD referenced in the ALS **nor** is the ALS referenced in the AD.

EASA response:

Comment not agreed. This AD is not mandating an ALS variation, but a reduced life limit only applicable for a limited batch of parts. See also EASA answer to comment 2B

Commenter 5: China Southern Airlines Co. Ltd. – Jiao Wu – 08/02/2022

Comment # 5

For the "Re-assessment of Repair(s) ", on page 2 of 3, which part does the "repaired MLG sliding tube installed" refer to? I see no indication (PN, SN, ect....) of this in this PAD, nor is it required in SB A330-32-3301_R00.

EASA response:

Comment noted: the PAD refers by mistake to "sliding tube", in lieu of "sliding pistons". Final AD has been updated accordingly.

Commenter 6: Brussels Airlines – Dirk Biesen – 10/02/2022



Comment # 6

Can we use our maintenance records to determine that our A/C are affected in lieu of visual inspection of PN and SN on the A/C? I cannot find this info in the PAD.

EASA response:

Comment noted – see EASA answer to Comment 1

Commenter 7: Deutsche Lufthansa AG – Steffen Widmer – 15/02/2022
Comment # 7

PAD 22-007 § (1) mandates to replace affected parts as published in the SB A330-32-3302 and SB A340-32-4321. The SB requires to perform a physical inspection of the parts installed on aircraft. But it is also possible to perform the identification of affected parts by review of the aeroplane maintenance records as already done for the first batch of 300M parts i.a.w. EASA AD 2017-0185. It should be possible to perform the identification either by a physical inspection on aircraft or by review of the aeroplane maintenance records. DLH would prefer to perform the identification by review of the aeroplane maintenance records, as we can fully rely on these records and it saves us and other airlines a lot of effort and costs.

DLH requests EASA to address this issue with Airbus and to add a note to the upcoming AD saying that a review of aeroplane maintenance records is also acceptable for identification of the installed MLG and NLG main fittings and sliding pistons.

EASA response:

Comment noted – see EASA answer to Comment 1

Commenter 8: MNG Airlines – Burcu Kurnazoglu – 16/02/2022
Comment # 8

We have repaired sliding pistons in the fleet but their SNs are not listed in SB 32-3302.

Could you please check and confirm that “Repaired MLG sliding piston” in the definition part of the PAD corresponds to sliding pistons which are listed in SB 32-3302 and repaired iaw CMM? If they are not listed in the SB, are they still affected?



“Repaired MLG sliding piston: Affected part MLG sliding tube, repaired in accordance with the instructions of the applicable Component Maintenance Manual.”

EASA response:

Comment noted: parts not listed in the SB are not affected. See also EASA answer to Comment 5.

Commenter 9: Scandinavian Airlines System – Gabriella Klouda – 18/02/2022

Comment # 9

Will the AD state that there will be possible to do a maintenance records review instead of a physical inspection?

EASA response:

Comment noted – see EASA answer to Comment 1

Commenter 10: Delta Air Lines – James Thompson – 22/02/2022

Comment # 10

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 22-007, dated 26 Jan 22

(B) Airbus Service Bulletin (SB) A330-32-3302, dated 18 Jan 22

DAL requests clarification if a records review is an acceptable means in determination if an operator has an “affected part”.

Ref (A) defines an affected part as an Nose landing gear (NLG) and main landing gear (MLG) main fittings, and MLG sliding pistons, having a Part Number and a serial number listed in the Ref (B); and defines Groups as Group 1 aeroplanes are those that have an affected part installed. Group 2 aeroplanes are those that do not have an affected part installed.

Within Ref (A) requirements, para (1) identifies for Group 1 aeroplanes requires replacement of Ref (B) Appendix 01 affected parts with a serviceable part. Ref (A), does state whether the determination of the applicable MPN and S/N can be accomplished via a records review or if physical determination is required.



Ref (B) includes Job Set-up and Close-up instructions for physical inspection.

List paragraphs that change: Ref (A) Paragraph (1) clarification

EASA response:

Comment noted – see EASA answer to Comment 1

