

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-024

[Published on 11 March 2022 and officially closed for comments on 08 April 2022]

Commenter 1: Lufthansa Technik AG – Andreas Uhl – 04/04/2022

Comment # 1

- (A) 'Reason' section, last sentence: NOTE: SB A350-71-P011 reflects modification status at time of delivery. Engines might have already been changed. Therefore we recommend to also mention Engine SB Trent XWB71-J652, which shows applicability on Engine ESN basis.
- (B) We recommend an additional paragraph Modification (3), which describes the mandatory modification in case of pre mod 112589 bracket is installed.

EASA response:

Comment partially agreed. The reference to SB A350-71-P011 has been removed in the final AD, which refers now to SB A350-71-P006 only.

Commenter 2: Delta Air Lines – James Thompson – 06/04/2022

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-024, dated 11 March 2022
- (B) Airbus Service Bulletin (SB) A350-54-P006, dated 13 Jan 22
- (C) Airbus Service Bulletin (SB) A350-71-P011, dated 13 Jan 22

Comment # 2

Commenter Request

Modify Ref (A) PAD, Definitions, to include Ref (C) SB



Request justification

The “Required Actions” section of PAD Ref (A) state to accomplish corrective actions as identified in SB Ref (B) if any discrepancies are detected. While SB Ref (C) is mentioned in the “Reason” section of PAD Ref (A), it does not explicitly add a requirement to complete SB Ref (C) concurrent with SB Ref (B).

List paragraphs that change; describe (nonobvious) changes

Definitions: New Definition for the SB: A350-54-P006 and A350-71-P011

*Comment # 3*Commenter Request

Modify Ref (A) PAD, Corrective Action, to include Ref (C) SB

Request justification

The “Required Actions” section of PAD Ref (A) state to accomplish corrective actions as identified in SB Ref (B) if any discrepancies are detected. While SB Ref (C) is mentioned in the “Reason” section of PAD Ref (A), it does not explicitly add a requirement to complete SB Ref (C) concurrent with SB Ref (B).

List paragraphs that change; describe (nonobvious) changes

Add requirement to complete SB 71-P011 concurrent with SB 54-P006 for all Configuration 001 aircraft.

*Comment # 4*Commenter Request

Modify Ref (A) PAD, to address Ref (C) SB previous accomplishment

Request justification

Accomplishment of SB Ref (B) requires simultaneous accomplishment of SB Ref (C) for all Config 001 aircraft. However, SB Ref (C) is not mandatory and can be accomplished by applicable operators at any given time before the compliance time of 10000 FC. And Ref (C) does not specify concurrent accomplishment of Ref (A). PAD Ref (A) does not address the case of an operator has already completed SB Ref (C) on Config 001 aircraft.

List paragraphs that change; describe (nonobvious) changes

Add new sentence or paragraph to Required Action(s) and Compliance Time(s) paragraph similar to as follows:

“Whereas SB 54-P006 calls for concurrent accomplishment of SB 71-P011 for Config 01 A/C, this AD allows for either previous accomplishment or concurrent accomplishment of SB 71-P011.”



Comment # 5**Commenter Request**

“In accordance with” language regarding SB 71-P011.

Request justification

Accomplishment of SB Ref (B) uses the “in accordance with” language to call for implementation of SB 71-P011. See page 53 of 54-P006 as an example. The 71-P011 SB does not have the paragraph about what is “Required for compliance” (RC) or not. This “in accordance with language” might otherwise be inferred as the entire SB is mandatory.

List paragraphs that change; describe (nonobvious) changes

Add new sentence or paragraph to Required Action(s) and Compliance Time(s) paragraph similar to as follows:

“Where SB 54-P006 uses the “in accordance with” language to refer to 71-P011, that is to be interpreted as only those steps in 71-P011 which are “in accordance with” in 71-P011 must be followed exactly as written but those in 71-P011 which use the “refer to” language, the operator may use another equivalent approved procedure.

Comment # 6**Commenter Request**

Test Section in 54-P006 and 71-P011 do not use “in accordance with” or “Refer to” language, leaving confusion.

Request justification

The “Test” section of 54-P006 states “This Service Bulletin requires the accomplishment of Tests given in other topics which are referenced in the table below: Ref. SB A350-71-P011.” The “Test” section of 71-P011 states “Do the test procedure as specified in the installation of the demountable power plant (FIN 4000EM1 and FIN 4000EM2), refer to Ref. MP A350-A-71-00-51-00ZZZ-720Z-A.”.

List paragraphs that change; describe (nonobvious) changes

Add new sentence or paragraph to Required Action(s) and Compliance Time(s) paragraph similar to as follows:

“Whereas the Test Section in 54-P006 and 71-P011 do not state “refer to” or “in accordance with”, the Test sections should be interpreted to as “refer to” and then the manual reference.

EASA response:

Comment # 2 and # 3 : Comments not agreed. The intent of the AD is to mandate all instruction of SB A350-54-P006 (and, in the final AD, SB A350-54-P008) including inspections and installations. Reference to SB A350-71-P011 has now been removed from the final AD. Application of SB A350-71-P011 is therefore necessary as per the instructions contained in SB A350-54-P006.



Comment # 4, # 5 and # 6: Comments noted. These comments have been provided to Airbus, and are taken into account in the individual SBs A350-54-P008 (RH side) and A350-54-P006 at Revision 01 (LH side).

