

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-132

[Published on 10 October 2022 and officially closed for comments on 24 October 2022]

Commenter 1: China Airlines – Chia-Hao Chang – 11/10/2022

Comment # 1

For SB A350-29-P020, the AD compliance time is 6 years from date of manufacture.

This SB requires KIT 29P020D01R02, but the lead time of this kit should be 280 calendar days

It can occur that the schedule of kit providing cannot match the compliance time for some aircraft which need to perform this SB.

We would like to know whether the AD compliance time has any flexible range?

EASA response:

Comment not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter.

Airbus retrofit management team is attempting to reduce the lead time for the availability of the kits. If the kits are not available in due time, operators may approach Airbus for technical justification to use to apply for an Alternative Method Of Compliance (AMOC) to extend the compliance time given in the AD.

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

Commenter 2: Finnair Plc – Janne Albäck – 12/10/2022

Comment # 2

The mandatory SB A350-29-P020 issued by Airbus is applicable to three MSNs in FIN fleet. Unfortunately, two of the applicable MSNs will not be able comply with the proposed deadline of 6 years from manufacture date. This is due to the fact that MSN 0097 already had its 6Y heavy maintenance check and MSN 0113 will not be able to get the needed modification kits in time for its 6Y heavy maintenance. According to latest information received



from Airbus, the earliest chance to get the required modification kits for the SB is in Q2/2023. Nobody will be able to perform the modification before this. Please check the table below for more information regarding dates.

MSN	Registration	MFG	AD due if 6Y from MFG	6Y check performed	Possible to perform 29-P020 at 6Y check	Next heavy visit after 6Y	Possible to perform 29-P020 before proposed AD deadline
0097	OH-LWH	3.4.2017	3.4.2023	Yes, 9.8.-16.9.2022	No, it was not possible to get mod-kits in time	late 2025 during C04	No
0113	OH-LWK	30.6.2017	30.6.2023	No, to be performed 24.1.-24.2.2022	No, mod kits available earliest Q2/2023	Jan 2026 during C04	No
0134	OH-LWL	22.9.2017	22.9.2023	No, to be performed 11.9.-10.10.2022	Yes, if mod-kits are available		Yes

FIN recommends to change the compliance time from 6 years to 9 years from aeroplane date of manufacture for the SB A350-29-P020. This would give FIN and other operators the chance to perform modification A350-29-P020 at the next suitable heavy maintenance visit after 6Y for those aircraft that do not have the possibility to perform it at 6Y heavy maintenance visit.

EASA response:

See response to the Comment # 1.

Commenter 3: Air France – Antoine Wasse – 21/10/2022

Comment # 3

We are surprised of the important compliance time for SB A350-29-P021 and -P023 application. Are you sure "flight cycle" is the good unit for compliance time?

We experienced an incapacity to perform SB A350-29-P020 in September, because the kit was not available on time. According to Airbus, the kit cannot be shipped before the end of the year. We have some concerns about the capability of Airbus to ship kits on time in order to comply with the AD.

EASA response:

See response to the Comment # 1.

Further, EASA has ensured the most appropriate units have been used for the compliance time.



Commenter 4: Delta Air Lines – Stephen Hill – 21/10/2022**Comment # 4****Reference:**

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-132, dated 10 Oct 22
- (B) Airbus Service Bulletin (SB) A350-29-P020 R01, dated 28 Jul 22
- (C) Airbus Service Bulletin (SB) A350-29-P021 R01, dated 13 Sep 22
- (D) Airbus TechRequest Reference # 81087991

Commenter Request

It has been indicated to Airbus in TechRequest # 81087991 that ESPM reference is incorrect in SB 29-P020 and SB 29-P021. Both service bulletins have been revised but the ESPM references to Bonding class and resistance values shown in Figures ICN-A350-A-29XXP020-A-FAPE3-04NCW-A-001-01 Fig.AB Sol.AA (in Ref (B)), and Figure ICN-A350-A-29XXP021-A-FAPE3-04RW1-A-001-01 Fig.AA Sol.AA (in Ref (C)) are incorrect.

Request justification

Airbus SB Appendix contains a maintenance error, TechRequest referenced in attachment.

List paragraphs that change; describe (nonobvious) changes

Referenced Service Bulletins require revision to correct erroneous data.

EASA response:

Comment noted. Airbus acknowledges the incorrect ESPM reference and is preparing a revision of SB 29-P020 and 29-P021 to correct the reference. A RDAF is planned to be issued pending the availability of the SB revisions.

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

