

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-143

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Commenter 1: Delta Air Lines – Cecilia Teeuwen – 21/11/2022

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 22-143, dated 25 October 2022

(B) Airbus Service Bulletin (SB) A330-73-3065, dated 17 August 2022

(C) Rolls-Royce SB Trent 1000 73-K766, dated 29 July 2022

Commenter Request

Modify Ref (A) PAD, Operational Limitations, paragraph (7) to allow the installation of an affected EEC SW, affected EEC unit and affected engine if the aircraft is operated in accordance with the EEC SW Intermix/Interchangeability requirements as defined in paragraph (2) and (4) and the Operational Limitations as defined in paragraph (6) of Ref (A) PAD.

Request justification

The Airbus SB (Ref B), which refers to Rolls-Royce SB (Ref C) for the installation of the serviceable EEC SW standard 5.3 on an aeroplane. Rolls-Royce SB (Ref C) contains instructions to modify a single EEC unit in both on-wing or off-wing environments. Therefore, an affected EEC SW can be replaced by a serviceable EEC SW once an affected EEC unit or affected engine is installed on-wing via the accomplishment of the Rolls-Royce SB post unit or engine installation. Furthermore, paragraph (2) and (4) of Ref (A) PAD define the intermix requirement of SW standard 5.3 with the affected SW. Therefore, once an aircraft is modified in accordance with the Airbus SB (Ref B), an affected SW, affected EEC unit or affected engine should be allowed to be installed on the modified aircraft as long as the intermix/interchangeability requirement is complied with and the two years limitation in paragraph (6) has not been exceeded. This would provide operational flexibility if an EEC unit/engine is required to be replaced on a modified aircraft, but only unit/engine with affected SW is available for replacement. And if necessary, the affected SW can then be modified once the affected EEC unit or affected engine is installed on-wing per the Rolls-Royce SB (Ref C).

List paragraphs that change; describe (nonobvious) changes

Operational Limitations:



(7) Delete or clarify the requirement “... provided, after that modification, no affected EEC SW, no affected EEC unit and no affected engine is re-installed on that aeroplane” from paragraph (7) as paragraph (2), (4) and (6) already provide EEC SW Intermix/Interchangeability requirement and time frame for which the requirements need to be complied with.

EASA response:

Comment not agreed: paragraph (7) of the AD does not prohibit reinstalling an affected EEC SW on an a/c, after embodiment of Airbus SB A330-73-3065. Paragraph (7) clarifies that if, after embodiment of that SB, an affected EEC SW is reinstalled on an a/c, the embodiment of that SB is no longer enough, per se, to record compliance with paragraph (6) of the AD; in such a case, the operator is expected to reassure, using a method which is acceptable to the NAA responsible for AD enforcement, that, starting from 2 years after the effective date of the AD, the a/c will not be operated if an engine has an affected EEC SW installed. No changes have been made to the Final AD in response to this comment.

