

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-006

[Published on 19 January 2023 and officially closed for comments on 16 February 2023]

Commenter 1: Lufthansa Technik AG – John Donegan – 20/01/2023

Comment # 1

As for many of the WFD mods, Airbus has defined a window of embodiment, i.e. included a lower threshold, to ensure the modification is implemented late enough, that the affected structure will remain WFD free up to certification limit, assumed LOV. We have reviewed PAD 23-006 and would like to submit the following comment:

LHT is requesting clarification in the final AD, whether one or both parameters of the "lower bound" parameters (FC and FH) need to be reached, to comply with the implementation schedule.

LHT understands in Required Action §1 of the PAD that "before reaching XXX or XXX, whichever comes first" as meaning that only one of the utilization parameters needs to be reached, in order to comply with the requirement. In AD 2018-0276R1 and 2019-0243, LHT refers to Note 3, which seems to require that both lower thresholds must be passed ("whichever comes later" of the two). Based on the upper and lower thresholds proposed in PAD 23-006, Airbus averages a flight utilization of approx. 3 FH per 1 FC. As this is only an average, for operators outside of this profile, it may be problematic to pass both lower values and still be below the earliest of the upper limits.

EASA response:

Comment noted. The AD requires the modification “not before reaching 12 400 FC or 37 200 FH, whichever occurs first”. Only one value between FC and FH must be exceeded to allow accomplishment of the modification. No changes have been made to the Final AD in response to this comment.



Commenter 2: European Air Transport Leipzig GmbH – Vincent Seipelt – 30/01/2023**Comment # 2**

/A/ EASA PAD No. 23:-006 issued 19 January 2023

/B/ Airbus Service Bulletin SB A330-53-3309, original issue, issued 06 October 2022

/C/ Airbus Service Bulletin SB A330-53-3309, Rev.QI, issued 10 January 2023

/D/ Airbus communication dossier RMT 81141103 (attached)

The German operator European Air Transport Leipzig GmbH (BCS) operates three A330-243F and two A330-343P2F aircraft.

Thus BCS is affected by and would like to comment on the ref /A/ PAD.

The upcoming AD, proposed per ref /A/, will mandate the exact same schedule as introduced per ref /C/. This includes the lower limit of embodiment (12400 TFC, 37200 TFH) and the upper limit/ SMP (20200 TFC, 60700 TFH).

After ref /B/ SB has been issued BCS has been in contact with Airbus as per ref /D/ dossier attached to this letter.

The reason to contact Airbus was that as per the utilization forecast of affected BCS fleet at least one aircraft most likely will violate either the lower or upper limits. When complying with the lower limit of 12400 TFC the upper limit of 60700 TFH most likely will be violated. And when complying with the upper limit of 60700 TFH the lower limit of 12400 TFC will be most likely be violated.

To clarify this condition Airbus has been contacted and responded as per message 81141103/005 in ref /D/ dossier. Airbus has informed BCS that the embodiment of ref /C/ SB is not sensitive to FH and the embodiment schedule should be based on FC. The upper FH limit is a mathematical result based on FC limit and basic flight time (BFT) of 3 hours.

Airbus points out that in such case, where any upper limit might be violated, the ref /C/ SB embodiment should be based on FC.

Based on the information and recommendation provided by Airbus in ref /D/ dossier the upper limit of 60700 TFH is only a result of mathematical calculation based on TFC limit and BFT and thus should be obsolete.

BCS would like EASA to review the information provided and to adapt the requirement section by removing the upper limit of 60700 TFH.

EASA response:

Comment not agreed: see EASA answer to comment #1. No changes have been made to the Final AD in response to this comment.

NOTE: Airbus communication dossier RMT 81141103 has not been attached to this CRD.

