

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-116

[Published on 18 October 2023 and officially closed for comments on 15 November 2023]

**Commenter 1: PLUS ULTRA LÍNEAS AÉREAS, S.L. – Juan Moreno Pérez – 24/10/2023**

### Comment # 1

Paragraph “Ref Publications” says:

“Airbus A330 ALS Part 3 Revision 08 dated 02 October 2023.

The use of later approved variations or revisions of this document is acceptable for compliance with the requirements of this AD.”

Where it indicates “...later approved variations or REVISIONS...” it could drive to a misunderstanding due to Airbus referring to revision when a documents changes from revision 08 to 09, and issue 08.xx (where xx is an integer) when a new review of the current revision released.

I.e.: revision 008 issue 02 means a later reviewed of revision 008 but the document continues being revision 08. Revision 09 means a new revision of the ALS has been released superseding the revision 08.

When the AD says “Revisions,” are you including later revisions (09, 10, etc.)?

If it refers to later issues of the current revision, could you change the paragraph as suggested below?

“Airbus A330 ALS Part 3 Revision 08 dated 02 October 2023.

The use of later approved variations or ISSUES of this document is acceptable for compliance with the requirements of this AD.”

### EASA response:

**Comment noted: EASA confirm that later Revisions are acceptable for compliance (e.g., with reference to this AD, A330 ALS Part 3 Revision 9, once issued, will be acceptable for compliance with the requirements of this AD). The statement also allows using later Issues of an ALS revision for compliance with the requirements of this AD. No changes have been made to the Final AD in response to this comment.**



**Commenter 2: Delta Air Lines – Cecilia Teeuwen – 09/11/2023****Comment # 2****Reference:**

- (A) EASA Proposed Airworthiness Directive: PAD No. 23-116, dated 18 Oct 23
- (B) EASA Airworthiness Directive: No. 2013-0251 (Correction), dated 16 Oct 13
- (C) EASA Airworthiness Directive: No. 2020-0054, dated 11 Mar 20
- (D) A330 Airworthiness Limitations Section (ALS) Part 3 Rev 08, dated 02 Oct 23

**Commenter Request**

Delta Air Lines requests that PAD 23-116 Ref (A) be revised to mark EASA AD 2013-0251 Ref (B) and EASA AD 20020-0054 Ref (C) as superseded as the requirements of this AD were transferred into A330 ALS Part 3 Rev 08 Ref (D) task 276400-00001-1-C.

**Request justification**

EASA AD 2013-0251 (Correction) Ref (B) and EASA AD 2020-0054 Ref (C) were issued because it was identified that seven SSC had lost their hydraulic locking function. The results of the subsequent technical investigation accomplished in-shop by the part supplier confirmed the system failure was due to a sheared seal on the blocking valve, ensuring the blocking function of the spoiler. It is suspected that the seal damage may have occurred during accomplishment of a modification to fit a new design of maintenance cover on wing.

EASA PAD 23-116 Ref (A) was issued on 18OCT23 to mandate the operators to incorporate the A330 ALS Part 3 Revision 08 Ref (D) into the operator's maintenance programs within 12 month of the AD effective date. The A330 ALS Part 3 Revision 08 Ref (D) revised task 276400-00001-1-C increasing the limit from 48 Month up to 72000 FH and revised the applicability from A330-800 to all A330s. Additionally added a note that states, CREDIT CAN BE TAKEN FROM THE LAST INSPECTION IN ACCORDANCE WITH SB A330-27-3195 (EASA AD NO.: 2013-0251), OR REQUIRED ACTIONS TO COMPLY WITH EASA AD NO.: 2020-0054 OR THE LAST ACCOMPLISHMENT OF MRBR TASK 27.64.00/03 TO COMPLY WITH THIS REVISED CMR TASK 276400-00001-1-C". This revision transferred the EASA AD 2013-0251 Ref (B) and the EASA AD 2020-0054 Ref (C) repetitive maintenance requirement into task 276400-00001-1-C.

**List paragraphs that change; describe (nonobvious) changes**

Revise Supersedure to state, "This AD supersedes EASA AD 2013-0251 (Correction) dated 16 October 2013, EASA AD 2020-0054 dated 11 March 2020 and EASA AD 2021-0248R1 dated 12 October 2022."

***EASA response:***

*Comment partially agreed: While EASA agree with the technical content of the comment, EASA do not agree to supersede EASA AD 2013-0251 (including its correction) with this new AD. EASA AD 2013-0251 also includes requirements for A340 aeroplanes, which cannot be retained in an A330-only AD. The requirements of EASA AD 2013-0251 will be taken over by this AD (for A330 aeroplanes) and by the corresponding ALS AD for A340 aeroplanes; a cancellation notice, effective on the same date as the ALS ADs, will be published concurrently. EASA agree to supersede AD 2020-0054, being that AD only applicable to A330-941 aeroplanes. Final AD has been updated accordingly.*

