

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-034

[Published on 18 March 2024 and officially closed for comments on 15 April 2024]

Commenter 1: Bangkok Airways Public Company Limited – Nopparut Jarusomboon – 19/03/2024

Comment # 1

According to EASA PAD 24-034 required repetitive GVI of the affected part which is described only by the P/N and the word "Antenna". There is no information regarding which antenna (should be more specific) or system is affected. It is quite hard to identify whether the operator has that plate installed on aircraft or not.

Can you provide more information?

EASA response:

Comment # 1 – noted. The applicable SBs listed in the PAD clarify that the affected part defined as “Antenna adapter plate having a part number (P/N) as listed in Appendix 1 of this AD.” Belong to the “Broadband transceiver system”. Figures are also present in the applicable SBs indicating where such antenna adapter plate is located on aircraft.

The “affected part” definition in the final AD has been enhanced specifying that it refers to “Broadband antenna adapter plate”.

Commenter 2: Cathay Pacific Airways Limited – Venugopal Ponnampalam – 08/04/2024

Comment # 2

This PAD is applicable to our A350 fleet and to ensure correct compliance to the requirements, below are our enquiries/feedback on this PAD:

- A. When can we expect the EASA AD issuance for this GVI task?
- B. PAD states the compliance time for each affected tail is from the effective date of the EASA AD. Is this correct?
- C. GVI at an interval of not exceeding 36 months, CX request Airbus to include in the MPD task to ensure proper control of the repetitive GVI.



D. If SB A350-44-P090 is revised, will there be a requirement for operators to perform additional task on tails embodied by this SB?

EASA response:

Comment #2 A – noted. Each EASA AD is issued after consultation period defined in the PAD.

Comment #2 B – confirmed. Paragraph (1) of the AD states “(...) Where the applicable SB refers to the “SB publication date”, the effective date of this AD must be used instead.”

Comment #2 C – noted and forwarded to Airbus.

Comment #2 D – noted. The need to perform additional actions on the fleet cannot be at present foreseen and is subject to future assessment. If need will arise to perform any additional action on the affected fleet such requirement will be covered most likely by a revision of the affected SBs and possible AD supersedure.

No changes have been made to the Final AD in response to these comments.

Commenter 3: Deutsche Lufthansa AG – Walter Press – 09/04/2024

Comment # 3

A. The PAD mentions in the Appendix 1 “Affected parts” the applicable adapter plate but this part number does not clearly describe the exact adapter plates which are affected, but identifies a kit number consisting of different parts. This could be misleading and results in a misinterpretation of the Airworthiness Directive. An operator will not find this kit part number in the relevant illustrated part catalogue or line maintenance document or supplement of the aircraft.

In order to identify the exact antenna adapter plate part number, you may refer to the relevant Airbus Service Bulletin, as an example, I mention the A330 case A330-44-3054. In order to find out that this document is only the container for the additional component, you need to refer service bulletin RDAA903194-01-44-00 raised by Panasonic. After looking in the Panasonic document you can notice that P/N 127928-01 [IPC P/N STR111A0005-3] is affected.

Below is a table where I had tried to identify the adapter plate part numbers for the other fleets, but I was not able to collect this information promptly.



KIT PART	DESIGNATION	PART NUMBER
RD-AA903366-01	TOP KIT - Antenna System, PAC GCS, A350 Single Panel antenna (SPA)	P/N 130594-01 [IPC P/N STR111A0003-2003]
RD-AA903008-01	TOP KIT - Antenna System, PAC GCS, A350 Dual Panel antenna (SPA)	No number named in SBC [IPC P/N STR111A0003-3] IPCS 10T179R009 (IPC Supplement)
RD-AA903141-01	Adapter Plate Installation Kit DPA (A380)	No number named in SBC [IPC P/N STR111A0004-3] IPCS 12T168R009
RD-AA903194-01	Adapter Plate Installation Kit DPA (A330 family)	P/N 127928-01 [IPC P/N STR111A0005-3]
RD-AA903528-01	Adapter Plate Installation Kit SPA (A330 family)	No information available for DLH
RD-AA903465-01	Adapter Plate Installation Kit SPA (A320 family)	No information available for DLH

In our opinion an airworthiness directive should be as clear as possible and not asking to dive in two other documents which could result in failures with regard to such a delicate topic as the radome adapter plate is. Airbus, respectively Panasonic, should be able to provide the part numbers of the affected adapter plates to you.

B. As a further issue we have identified the Part Installation:

“(5) For Group 1 and Group 2 aeroplanes: From the effective date of the AD, it is allowed to install an affected part on an aeroplane, provided that part is new and, after installation, GVI and corrective action(s), as applicable, are accomplished on that affected part, as required by this AD. After that installation, the aeroplane is effectively considered a Group 1.”

Damages on the adapter plate are not only driven by corrosion and cracking. EASA and Airbus should be aware that the adapter plates could be equipped with a special absorbing coating, which can become loose over the time. The coating may be re-applied during a repair station visit within Haeco/Panasonic on an in-tact adapter plate and your statement that only “new” parts can be installed will be a penalization. The coating may not be applied directly on the aircraft due to processing and treatment restrictions. We anticipate that an adapter plate that is new or has passed the examination without corrosion or cracking is good to be installed on the same or another aircraft for at least one interval of the inspection.



EASA response:

Comment # 3 A – agreed. The affected part definition has been updated in the final AD referring to “Broadband antenna adapter plate, skirt, vents and attachment fittings installed, or eligible for installation on an aeroplane, by embodiment of Airbus production modification (MOD) as specified in Appendix 1 of this AD, or in accordance with the instructions of Airbus Service Bulletin (SB) listed in Appendix 1 of this AD”. Appendix A lists Airbus’s mods and SBs installing the affected parts.

Comment # 3 B – agreed. The AD Part Installation paragraph (5) requirement has been reworded to include instructions for the installation of used parts.

Commenter 4: TAP Maintenance & Engineering – João Franco – 12/04/2024
Comment # 4

In Required Action(s) and Compliance Time(s):

- A. Corrective Action(s) (2): It is not clear whether or not replacing the adaptor plate with another (repaired and serviceable or new) plate is considered an acceptable corrective action when corrosion/cracking is found during the mandatory GVI. The VSB/SB are not clear regarding the possibility of performing a plate swap in case repairable damage is found.
- B. Part Installation (5): Is the interpretation that only new parts (with the exception of a part removed and installed in the same airplane during a single maintenance visit) can be installed in a Group 1 aircraft correct? If so, does this mean that installing a repaired and duly certified plate is not possible? This interpretation does not allow for much flexibility in case an unscheduled radome opening in operation is required (for example due to antenna repair) that leads to the finding of a corroded/cracked adaptor plate.

EASA response:

Comment # 4 A and B – agreed. See answer to Comment # 3 B.



Commenter 5: Swiss International Air Lines Ltd. – Vasiliki Kontosi – 15/04/2024

Comment # 5

The GCS system in our fleet is installed as an STC (not line fit).

Therefore, I would appreciate it if you could advise regarding the below concerns we have as per the PAD info.

A. At the first page of the PAD at the Applicability section you have mentioned “all manufacturer serial numbers”.

Of course, if we check the pages below like the Definition part, the applicable SB A330-44-3054 (page 2 out of 6) which is mentioned there or at the reference publications’ part (page 3 out of 6) does not include our fleet SNs.

Could you please confirm that it is not applicable to our fleet due to the fact that we have performed the system installation as an STC?

Do you need to define the exact SNs affected from this PAD on the first page of the document? Or mention “not applicable to the STC installations”?

B. Additionally, as this installation has been performed as STC in Swiss Air Lines fleet, are you going to add any extra information on this PAD for those cases? Or are you going to issue a separate PAD ?

C. At the affected parts section you mention Panasonic P/Ns but we have installed HAECO P/Ns. Do you have to mention those too?

EASA response:

Comment # 5 A – not agreed. The Part Installation paragraph (5) of the AD makes this AD applicable to all MSNs installing or which will install the affected PN through Airbus’ design solutions.

No changes have been made to the final AD in response to that comment.

Comment # 5 B – noted. The AD identifies the holder (Airbus) of the design solutions affected by the unsafe condition addressed by this AD, and applies to all aircraft embodying such designs. Any STC holder of similar design solutions is expected to review its own designs also in the light of the content of this AD and assess whether such design solutions are also affected by the same unsafe condition hereby addressed. See also remark 4 of the AD.

No changes have been made to the final AD in response to that comment.

Comment # 5 C – agreed. This AD applies to all affected parts defined as per the AD, installed in accordance with Airbus design, regardless of the commercial identification of the affected part manufacturer. The final AD has been updated accordingly.

