

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-040

[Published on 09 April 2024 and officially closed for comments on 23 April 2024]

Commenter 1: Deutsche Lufthansa AG – Oliver Bender – 18/04/2024

Comment # 1

We do not have the SB 103004-7-8-25-A543, as referenced in the PAD.

An inquiry (dated 15 Apr 2024) to Collins Aerospace resulted in following excerpt from their E-mail:

“... The document 103004-7-8-25-A543 was mistakenly announced prior to being ready for distribution. Once this document is ready, a follow-up announcement will be sent indicating that it is ready for download. Apologies for any issues this may have caused.”

I ask you to check this and whether an extension of the evaluation period is possible. Period depending on the availability of the non-existent SB.

EASA response:

Comment noted.

EASA confirms your concern and clarified the situation with Airbus and Collins, who excused for the late publication, due to several issues. SBA 103004-7-8-25-A543 was finally released by Collins Aerospace on 17th April and was published on 19th April. Therefore, no extension of the consultation period was foreseen, and the release date of the SBA has been amended in the Final AD.

Commenter 2: Deutsche Lufthansa AG – Oliver Bender – 22/04/2024

Comment # 2

Is the interval reduction of the Community 2 (= Table 2) S/Ns to 36 months permanent? See §3 Inspection of the PAD.

Or is the reduction only valid until after the next Proof Pressure Test (PPT)?



EASA response:**Comment noted.**

EASA confirms that the 36 months interval for inspected Community 2 affected parts (as listed by s/n in Table 2 of the SB) is indeed recurrent (and not just until the next PPT). This permanently reduced TBO to 36 months is applicable for each Community 2 affected part, until the life limit hereof, or until replacement of the inflatable assembly, after failing the (future) proof pressure testing (PPT).

Therefore, no change has been made to the Final AD in response to this comment.

Please, also refer to paragraph (5) of this AD (Terminating Actions), stating that “(only) replacement of each Community 2 affected part with a serviceable part which is not a Community 2 affected part, constitutes terminating action for the repetitive inspections (with a 36 months interval), as required by paragraph (3)”.

Commenter 3: Etihad Airways – Tewodros Adamu – 01/05/2024

Comment # 3

The subject PAD, paragraph (3), requires for aeroplanes with affected Community 2 units installed, to accomplish a proof pressure test (PPT) and air retention test (ART) in accordance with the instructions of section 3. C. (2) (b) of the SB, at intervals, not to exceed 36 months. In order, to align with the MPD time between overhaul (TBO), Etihad suggests to reword the statement as follows: "Airplanes with affected Community 2 units: Within 4 months after the effective date of this AD, or within 36 months since last overhaul of that affected part, whichever occurs later, perform a proof pressure test (PPT) and an air retention test (ART). Thereafter, reduce the time between overhaul (TBO) not to exceed 36 Months and perform a PPT and ART at each TBO.

Comment # 4

Etihad Airways reviewed the subject Proposed AD (PAD) and noted that paragraph (7) allows to install on any aeroplane a Community 2 affected part, provided it is a serviceable part, as defined in this AD, and that, following installation, it is inspected as required by this AD.

Etihad Airways has freshly overhauled serviceable units in stock, before the release of this AD. The slides are not due for 36 Months overhaul. Can EASA clarify paragraph (7) by stating that this kind of slides can be installed on aeroplanes after the effective date of the AD as far as the PPT and ART are performed not exceed the unit TBO of 36 Months, as requested in this AD?



EASA response to Comment # 3:

Comment noted.

EASA can confirm that your interpretation is correct and took your proposal in consideration, however, the text in paragraph (3) of this this AD is more or less 'standard EASA text', used for such (similar) cases, and is requiring in fact the same. Therefore, no change has been made to paragraph (3) in the Final AD.

Please, also refer to EASA respons to Comment # 2.

EASA response to Comment # 4:

Comment noted.

EASA confirms, that a Community 2 affected part (unit), as defined in this AD (listed in Table 2 of the SB), can, after the effective date of the AD, be installed on any aeoplane, "provided it is a serviceable part, as defined in this AD, and that, following installation, it is inspected as required by this AD"; at intervals (with a time between overhaul (TBO), not to exceed 36 months, (until end of life, or replacement of the inflatable assembly, as required by paragraph (3) of this AD. Therefore, no change has been made to the Final AD.

Please, also refer to EASA respons to Comment # 2.

