

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-063

[Published on 31 May 2024 and officially closed for comments on 28 June 2024]

Commenter 1: Iberia – José Manuel Enebral Trigo – 03/06/2024

Comment # 1

We suggest to emphasize within the “Definitions” Section of PAD 24-063 (and also in the corresponding future AD) that the applicable pre/post mod 155607 SBs are optional, therefore adding the wording “optional” to the title highlighted in bold for those SBs.

EASA response:

Comment not agreed.

The reason paragraph provides explanation that EASA AD 2016-0105 (which is superseded by this AD) was revised twice (R1 and R2), to include those SBs, as optional. There is no added value in adding “optional” to the Definitions.

Commenter 2: British Airways – Adrian Hewes – 11/06/2024

Comment # 2

BAW have reviewed EASA PAD 24-063 and note that under the ‘Reason’ paragraph it states:

"Since that AD was issued, further analysis determined that the compliance time for the inspections must be based also on flight hours (FH).

For the reasons described above, this AD retains the requirements of EASA AD 2016-0105R2, which is superseded, and introduces FH elements in the compliance time".

BAW also note that there are multiple other changes in the proposed Corrective Action(s) Paragraphs (2) and (3) which include reference to specified Repair Instructions in new Table 4 and the need to accomplish the next DET inspection at a specified FH/FC figure after the RI embodiment.

BAW politely request that EASA considers adding further details of these changes into the ‘Reason’ paragraph.

EASA response:



Comment noted. The reason for the supersedure was the introduction of the compliance time also in flight hours (FH). The other changes in the AD were clarifications and the use of EASAs latest standards in AD writing. EASA does not see the necessity to update the reason paragraph accordingly. No change was made to the final AD in response to that comment.

Commenter 3: Delta Air Lines, Inc. – Gabriel Segura – 19/06/2024

Comment # 3

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 24-063, dated 31 May 2024.

(B) EASA Airworthiness Directive: No. 2016-0105R2, dated 08 October 2021.

Commenter Request

Modify paragraph (3) of Ref (A) PAD to authorize inspection method, threshold and interval prescribed by Airbus if a repair was accomplished per other Airbus approved repair instructions that are not the prescribed RI instructions detailed in table 4 of Ref (A) PAD.

Example:

“(3) After accomplishment of a repair at a location in accordance with the instructions of the RI as defined in Table 4 of this AD, accomplish the next DET, as required by paragraph (1) of this AD for that location, within 29 700 FH or 14 800 FC, whichever occurs first after the RI embodiment and, thereafter, at intervals not to exceed the values defined in Table 2 of this AD. **Alternatively, if other Airbus approved repair instructions and inspections are received that defer from the RI’s defined in table 4, accomplish defined inspections (method, threshold and interval) within the Airbus instructions for that specific location.**”

Request justification

Paragraph (2) of Ref (A) PAD allows operators to contact Airbus to obtain different repair instructions besides the ones stated in this AD (RI’s detailed in Table 4 of Ref (A) PAD) as it states:

“...or contact Airbus for approved repair instructions and, within the compliance time specified therein, accomplish those instructions accordingly.”

DAL assumes that the inspection method, threshold, and interval defined in paragraph (3) of Ref (A) PAD is prescribed to ensure any fatigue cracking caused by the new repaired structure is detected and is based on the new repaired fatigue and stress environment of the repaired structure per the RI’s defined in table 4 of Ref (A) PAD.



DAL believes that any specific repair instructions that defer from the RI's detailed in Table 4 of Ref (A) PAD will have a different fatigue environment and induced stress. Therefore, different inspection methods, thresholds and intervals would be defined in the Airbus approval and might defer from the AD mandated ones detailed in paragraph (3) of Ref (A) PAD.

For the reason detailed above, DAL believes that since Ref (A) PAD allows operators to contact Airbus for alternative repair instructions in paragraph (2) of Ref (A) PAD, the inspections associated to these Airbus approved alternative repairs should also be allowed to be accomplished in lieu the prescribed inspections defined in para (3) of Ref (A) PAD.

List paragraphs that change; describe (nonobvious) changes

EASA PAD 24-063 Paragraph (3).

EASA response:

Comment not agreed.

Paragraph (3) of the AD is only applicable for repairs in accordance with the instructions of the repair instructions as defined in table 4 of this AD. For those using other Airbus approved repair instructions, as described in paragraph (2), paragraph (2) states “within the compliance time specified therein, accomplish those instructions accordingly.”.

No change was made to the final AD in response to that comment.

Commenter 4: Lufthansa Technik AG – Anton Leontev – 19/06/2024

Comment # 4

During review of the subject PAD 24-063 a typo has been found in the Table 1:

“Threshlods” instead of “Threshholds”.

EASA response:

Comment agreed. The final AD has been updated accordingly.

