

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-079

[Published on 04 July 2024 and officially closed for comments on 01 August 2024]

**Commenter 1: Lufthansa Technik AG – Jann Rauschenberger – 10/07/2024**

### Comment # 1

A. Paragraph (1) Inspections: [...], or 22 months after the effective date of this AD, whichever occurs later, and, thereafter[...]

Comment: Within the Inspection SB, 24 months after AD effective date is mentioned. As especially the Door 1 LH and RH will be opened often due to Pax boarding and Servicing (Food delivery, Maint. Activities), a not properly rigged Door will be recognized during opening and closing. Therefore, it is not clear why EASA chooses 22 months instead of 24 months. Also 24 months will give the chance to plan this into a High Maintenance Layover. Can EASA please give more information or change to Threshold to 24 months as mentioned in the SB?

B. Paragraph (5) Reporting.

Comment: LHT Engineering reads that only in case of findings a report must be sent. Please confirm.

### **EASA response:**

**1A) Comment not agreed. Data does not support a general extension of the compliance time as proposed. EASA has initially set a compliance time of 22 months in the PAD (compared to the 24 months mentioned in the SB) to stay as much as possible aligned with the outcomes of the decided fleet management plan. The compliance time in the Final AD has been reduced to 16 months to compensate the further delay in issuance of the AD, pending the availability of the revised SBs.**

**1B) Comment agreed: No reporting is required in case of no findings. No changes have been made to the Final AD in response to this comment.**

**Commenter 2: Deutsche Lufthansa AG – Walter Press – 15/07/2024**

### Comment # 2

A. Inspection interval:



EASA defines a threshold of 24 months after the aeroplane date of manufacture, or 22 months after the effective date of this AD, whichever occurs later.

Some operators may have extended the regular C-Check to 24 months or requiring an extension of C-Check due to operational needs at a certain stage and, for this reason, we kindly ask to allow an inspection for aircraft which have already exceed the timeframe of 24 months after aeroplane date of manufacture to accomplish the SBs at a threshold of 24 months. This will also help to fit the repetitive inspection to the next base maintenance event.

#### B. Reporting:

If, during any inspection as required by paragraph (1) of this AD, or following the accomplishment of corrective actions in accordance with the instructions of the SB, as required by paragraph (2) of this AD, as applicable, any discrepancy is detected, as defined in the SB, within 90 days after that inspection, report the inspection results to Airbus. Using the Inspection Report attached to the SB is an acceptable method to comply with this requirement.

This paragraph is slightly confusing and may lead to misinterpretation.

Is a reporting required if a discrepancy is detected during an inspection (paragraph 1 of P AD) or the associated corrective action (paragraph 2 of PAD) only?

Or is the reporting needed after every conducted inspection or rectification?

DLH has the understanding that the discrepancies and damages have to be provided to Airbus and the results of proper adjusted doors are not relevant for them. Could you please confirm this?

#### ***EASA response:***

***2A) See EASA answer to comment 1A***

***2B) See EASA answer to comment 1B***

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

***Commenter 3: Cathay Pacific – Gawin Lau – 29/07/2024***

**Comment # 3**



- A. May I know what is the finding rate of at least one measurement out of rig on 1L and 1R doors? Furthermore, is there any specific location(s) with the most frequent out of rig finding rate?
- B. As per paragraph (3), how many cases with discrepancy will still be detected after accomplishment of the corrective action as required by paragraph (2)? In general, what is the worst case scenario and what was the usual final fix? CPA would like to estimate the additional ground time, manpower and material required based on the worst case scenario.

**EASA response:**

**Comment noted. EASA cannot provide the requested information, for confidentiality reasons. EASA recommend contacting Airbus for additional information. No changes have been made to the Final AD in response to these comments.**

**Commenter 4: Delta Air Lines – Tara Jain – 30/07/2024**
**Comment # 4****Reference:**

- (A) EASA Proposed Airworthiness Directive: PAD No. 24-079, dated 04 July 2024
- (B) Airbus Service Bulletin (SB) A330-52-3150, dated 25 June 2024
- (C) Airbus Tech Request 81432027/003, dated 12 July 2024
- (D) Airbus Tech Request 81432027/007, dated 22 July 2024



Ref C -

81432027\_003.pdf



Ref D -

81432027\_007.pdf



Ref B -

A330-52-3150.pdf

**Comment A****Commenter Request**

DAL request the impending AD compliance threshold be revised to align with Ref (B) as state the following:

“within 24 months after Aeroplane date of manufacture or within 24 months after the AD effective date, whichever occurs later.”

**Request justification**

During review of Ref (A) it was noted that the compliance threshold is within 24 months after Aeroplane date of manufacture or within 22 months after the AD effective date.

While Ref (A) compliance threshold is within 24 months after aircraft entry into the service or after AD effective date.

24 months align with Delta Letter check for heavier maintenance checks.

List paragraphs that change; describe (nonobvious) changes

EASA Para (1):

- Compliance threshold after the effective date update.

#### **Comment B**

Commenter Request

Modify Ref (A), to add an exception paragraph and address discrepancies within Ref (B) and providing the following approval:

"Ref (B) Figure ICN-A330-A-52XX3150-A-FAPE3-01HWM-A-002-01 Fig.BA Sol.AA SHEET 1 of 2 FR14 refer to View B-B in lieu of View A-A."

NOTE: Airbus has communicated that the next SB revision (01) that has not yet been launched and does not have a dispatch date.

Therefore, DAL kindly requests these discrepancies be addressed in the impending EASA AD.

Request justification

During review of Ref (B), it was observed that Figure ICN-A330-A-52XX3150-A-FAPE3-01HWL-A-001-01 Fig.BA Sol.AA SHEET 1 of 2 identifies the Inspection of the Peripheral Clearance between the FWD PAX/Crew Door and the Door Frame showing View A-A for FR16A and FR14.

However, while reviewing Figure ICN-A330-A-52XX3150-AFAPE3-01HWM-A-002-01 Fig.BA Sol.AA SHEET 2 of 2, it was observed that it shows a close up of View A-A on FR16A, while on FR14 refers to View B-B.

Airbus has confirmed in Ref (C) that Figure ICN-A330-A-52XX3150-A-FAPE3-01HWM-A-002-01 Fig.BA Sol.AA SHEET 1 of 2 should show FR14 with View B-B.

List paragraphs that change; describe (nonobvious) changes

- New Exception paragraph to be added to the Ref (A) PAD.

#### **Comment C**

Commenter Request

Modify Ref (A), to add correction statement and address the following:



Modify Ref (B) 3.C.(1).(b).5 instructions state the door open/close lever must be in the down position, this instruction for the down position may be omitted,

and

“Where Ref (B) 3.C.(2).(b).5 instructions state the door open/close lever must be in the up position, this instruction for the up position may be omitted”

NOTE: Airbus has communicated that the next SB revision (01) that has not yet been launched and does not have a dispatch date.

Therefore, DAL kindly requests these discrepancies be addressed in the impending EASA AD.

#### Request justification

Airbus has confirmed in Ref (D) paragraph 2, that following error has been identified in Ref (B):

In Ref (B) Para C (1) (b) 5 requires for the washer inspection of the LH door, the door in the open position and door open/close lever is in DOWN position.

While, the same inspection required on RH side by Para C.(2).(b).5 with the door in the open position and door open/close lever in the UP position.

However, the position of the open/close lever is irrelevant since these steps are for inspection of the lock washer and no clearance check is required.

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

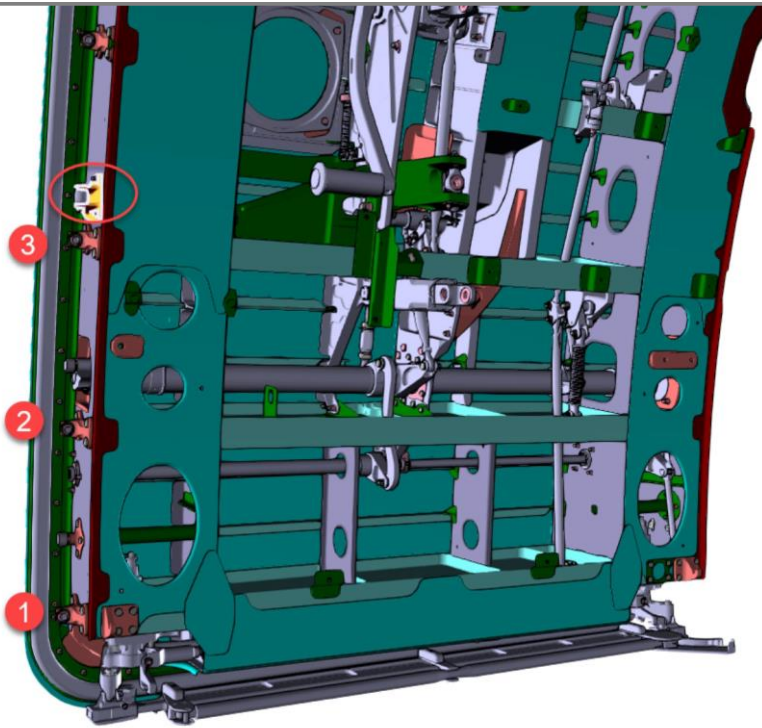
- New Exception sub-paragraph to be added to the Ref (A).

#### **Comment D**

#### Commenter Request

Modify Ref (A), to add correction statement approving use of the figure below (from Airbus) in lieu of Ref (B) Figure ICN-A330-A-52XX3150-A-FAPE3-01HWN-A-002-01 Fig.BB Sol.AA SHEET 1/2:





NOTE: Airbus has communicated that the next SB revision (01) that has not yet been launched and does not have a dispatch date. Therefore, DAL kindly requests these discrepancies be addressed in the impending EASA AD.

Request justification

Airbus has confirmed in Ref (C), that following error has been identified in Ref (B).

The location of the X-guide roller shown on Figure ICN-A330-A-52XX3150-A-FAPE3-01HWN-A-002-01 Fig.BB Sol.AA SHEET 1/2 is incorrect showing it as lower than the real position on A/C. Airbus provided a corrected figure to refer to instead.

List paragraphs that change; describe (nonobvious) changes

- New Exception sub-paragraph to be added to the Ref (A).

**Comment E**

Commenter Request

Modify Ref (A), to add correction statement providing approval for the following:



“Where Ref (B) Para C (1) (b) 2 and Para C (2) (b) 2 states inspect the rigging of the X-guide roller with FWD PAX/crew door in the closed and up position and door open/close lever is in down position against the door seal (door lifted).”

The following verbiage is to be used instead “inspect the rigging of the X-guide roller with FWD PAX/crew door in the closed position and the open/close lever in UP position against the door seal.”

Request justification

Airbus has confirmed in Ref (D) paragraph 1, that Ref (B) Para C (1) (b) 2 and Para C (2) (b) 2 require the inspection of the rigging values of the X-guide roller with the door in the closed and UP position and not - door open/close lever is in down position.

However, for accomplishment of these steps the door should be in the closed position and the open/close lever in UP position.

List paragraphs that change; describe (nonobvious) changes

- New Exception sub-paragraph to be added to the Ref (A).

**EASA response:**

**4A) See EASA answer to comment 1A**

**4B, 4C, 4D and 4E) Comment not agreed: EASA does not support using the AD to correct errors/typos in the referenced publication. According to Part 21, article 21.A.3B, the Design Approval Holder is in charge to make available to operators “appropriate descriptive data and accomplishment instructions”. When amendments to those instructions are made available by revision of the referenced SBs, those revision are already acceptable for compliance with the requirements of the AD.**

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

**Commenter 5: Cathay Pacific – Gawin Lau – 09/08/2024**

**Comment # 5**

After further checking on the SB accomplishment instructions against the aircraft physical condition and current AMM configuration. CPA discovered the following discrepancy.

According to SB accomplishment instructions 3. C. (1) (b) 3 & 4 and 3. C. (2) (b) 3 & 4, it is required to perform inspection on rollers and guide fittings. After a physical check and confirmed by AMM, the following MSN do not have guide fitting:



- B-HLM (MSN 386) , B-HLN (MSN 389) , B-HLO (MSN 393) , B-HYG (MSN 405) , B-HLP (MSN 418) , B-HLQ (MSN 420) , B-HLR (MSN 421) , B-HLS (MSN 423) , B-HLT (MSN 439) and B-HYI (MSN 479)

Airbus TR 71448081 has been raised for the following inquiries:

- Is Airbus going to revise the SB to produce 2 configurations? e.g. CONFIG 1 - with guide fitting, CONFIG 2 - without guide fitting
- When will the new SB revision be released?

Will the 24 months after the effective date of the SB compliance time or the 22 months after the effective date of the AD be further extend? As there will be more aircraft out of phase with C check while pending for new SB revision and it is required special input in case there is at least one clearance finding for door rigging before next flight

***EASA response:***

***Comment agreed. Airbus confirmed that a subpopulation was overlooked at the original issue of the SB. The SBs have been revised, and the Final AD has been amended accordingly, now referring to the SBs at rev 1. The compliance time as proposed in the PAD has not been extended – see EASA answer to comment 1A.***

