

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-085R1

[Published on 30 September 2024 and officially closed for comments on 14 October 2024]

Commenter 1: Silkair (Singapore) Pte Ltd – Soh Kian Ann – 03/10/2024

Comment # 1

Does compliance of Para (3) still requires compliance with paragraph (1) of this AD?

- (3) For an aeroplane that has been repaired, before the effective date of this AD, in the affected area by this AD using Airbus approved instructions unrelated to (not a result of a finding during an ALI inspection) ALI task 531153-02-1, 531153-02-2, 531155-02-1, 531155-02-2, 531153-03-1 and/or 531155-03-1 as applicable before exceeding the thresholds as specified in Table 1 (for CEO aeroplanes) or Table 2 (for NEO aeroplanes) of this AD, as applicable, contact Airbus for approved instructions and accomplish those instructions accordingly.

EASA response:

Comment noted.

Paragraph (3) is independent from paragraph (1) of the AD, which means compliance still has to be shown to paragraph (1) of this AD.

Before exceeding the compliance time of paragraph (1) (Table 1 (for CEO aeroplanes) or Table 2 (for NEO aeroplanes), Airbus has to be contacted for approved instructions and those instructions have to be accomplished accordingly.

Please note paragraph (5) of the AD and the Terminating Action paragraphs.



Commenter 2: HK Express – Wilson Yip – 07/10/2024**Comment # 2**

In PAD 24-085R1 (dated 30-Sep-2024), new paragraph (Para 3) is added for additional requirements:

“ (3) For an aeroplane that has been repaired, before the effective date of this AD, in the affected area by this AD using Airbus approved instructions unrelated to (not a result of a finding during an ALI inspection) ALI task 531153-02-1, 531153-02-2, 531155-02-1, 531155-02-2, 531153-03-1 and/or 531155-03-1 as applicable before exceeding the thresholds as specified in Table 1 (for CEO aeroplanes) or Table 2 (for NEO aeroplanes) of this AD, as applicable, contact Airbus for approved instructions and accomplish those instructions accordingly. ”

Due to above Para (3), HKE had contacted Airbus for consulting any additional requirements, since one of our CEO aircraft has been repaired in the frame 16 RH double joggle area per Airbus approved RDAF instructions, before the effective day of this AD. The repair is because of a finding when carrying out inspection SB 53-1373. Airbus clarified that our case is not considered as “unrelated”, but from HKE perspective, the repair is not a result of a finding during an ALI inspection, but shall be a finding during inspection per Para (1) and corrective action per Para (4).

HKE would like EASA to clarify further on Para (3), and we recommend including inspection SB reference in this paragraph.

EASA response:

Comment partially agreed.

Paragraph (3) is indeed only for an aeroplane that has been repaired before the effective date of this AD, not because of a finding during an ALI inspection or the inspection SB

The AD has been updated with reference to the Inspection SB.

