

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-109

[Published on 17 September 2024 and officially closed for comments on 15 October 2024]

Commenter 1: Cathay Pacific Airways Limited – Matthew Chu – 07/10/2024

Comment # 1

CPA has reviewed PAD No.: 24-109 and would like EASA AD Team to review whether a longer grace period can be provided for this AD.

According to this PAD, the threshold of the inspection is before exceeding 10 680 flight cycles (FC) since first flight of the aeroplane, or within 24 months after the effective date of this AD, whichever occurs later. For the A330 aircraft of CPA that are effective to this PAD, some of those currently have utilization greater than 9000 FC and is expected to reach 10680 FC soon.

Per TFU 53.10.00044, Airbus recommended SB A330-53-3319 & A330-53-3320 to be accomplished during Heavy Maintenance Visit (HMV) due to the maintenance activities that would derive from a finding during SB inspection which fitting replacement could be required. As the current grace period is 24 months after the effective date of this AD and there may not be sufficient time for CPA to prepare the inspection program for the aircraft that have coming C-Check input scheduled at the period of AD effective day, those aircraft may not have next C-Check scheduled to align with the AD compliance time.

Could EASA AD team please review whether the grace period can be increased to 30 months or greater to align with the C-Check input?

EASA response:

Comment not agreed: Available data does not support a general extension of the compliance time as proposed. No changes have been made to the Final AD in response to this comment.

Commenter 2: Delta Air Lines, Inc. – Gabriel Segura – 19/09/2024

Comment # 2

Reference:



(A) EASA Proposed Airworthiness Directive: PAD No. 24-109, dated 17 Sep 2024

(B) Airbus Service Bulletin (SB) A330-53-3319

(C) Airbus Service Bulletin (SB) A330-53-3320

Commenter Request

Modify Ref (A) PAD, paragraph (2) to include an exception to the reporting required per Ref (B) and (C) SBs, paragraph 3.C.(1).(c) which states:

“2- If crack is found:

a....

b. After completion of all inspections, complete and send the Inspection Report sheet in accordance with Ref. Task A330-A-53-XX-3319-01ZZZ-90AZ-A.

NOTE: If there are findings, send a report to the responsible authority and to AIRBUS in accordance with the regulations, refer to AIRBUS Ref. OIT 999.0066/15 and Ref. ISI 00.00.00217.”

And,

“3 If no crack is found:

a. After completion of all inspections, complete and send the Inspection Report sheet in accordance with Ref. Task A330-A-53- XX-3319-01ZZZ-90AZ-A.

NOTE: If there are findings, send a report to the responsible authority and to AIRBUS in accordance with the regulations, refer to AIRBUS Ref. OIT 999.0066/15 and Ref. ISI 00.00.00217.”

Exception requested is to provide operators the allowance to:

1 - Not report if there are no cracks found.

2 - Not report via the reporting form or in accordance with the Ref OIT and ISI if cracks are found.

Request justification

DAL believes that there is no reason for operators to report no cracks. If the threshold for the inspection is passed and there has not been a report from the operator to airbus of cracks for each msn affected by this PAD. Airbus has the ability to deduce the MSN had no findings as if there were cracks, the operator would have to contact airbus per the AD requirement to contact Airbus.

In the same manner, if cracks are found, operators are obligated to contact airbus for instructions and corrective actions. Thus, Airbus will be notified, and instructions will be requested. DAL feels that airbus has the ability to collect the data from the operators request for instructions and submitting a reporting sheet is an unnecessary burden to the operators.

DAL believes that the burden of collecting specific data stipulated in the reporting form of the Ref (B) and (C) SBs and in accordance with the ref OIT and ISI should fall upon Airbus and not the operators. Thus, the request to remove this requirement.



List paragraphs that change; describe (nonobvious) changes

Add an Exception to Paragraph (2) of Ref (A) PAD allowing operators to not report non-findings and to not have to use the reporting sheet provided in the Ref (B) and Ref (C) SBs, per the OIT or the ISI.

EASA response:

Comment agreed: As a general information, EASA confirm that, when reporting is required, it is mentioned through a dedicated section of the EASA AD. For the current AD, even if the SBs instructions dealing with reporting are part of section 3.C ("Accomplishment Instructions – Procedure") of the SBs (marked as 'RC'), the AD wording prevails and actually no reporting is required by this AD.

A note has been added in the Final AD to avoid any confusion.

