

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-148

[Published on 11 December 2024 and officially closed for comments on 08 January 2025]

Commenter 1: ITA Airways – Francesco Chiappetta – 12/12/2024

Comment # 1

Ref. A) Airbus A330 ALS Part 3 Revision 09 dated 01 October 2024.

Ref. B) EASA AD 2021-0281R1 - Maintenance Actions: paragraphs (4), (5). Corrective action(s): paragraphs (6), (7).

ITA Airways (ITY) kindly asks whether Ref. A) implements and supersedes the requirements of Ref. B).

If yes, please, may this supersedure written in the EASA PAD No.: 24-148.

EASA response:

Comment noted. EASA AD 2021-0281 has been revised (now at revision 2) to remove requirements now addressed in the ALS Part 3. No changes have been made to the Final AD in response to this comment.

Commenter 2: Delta Air Lines, Inc. – Ryan Scott – 30/12/2024

Comment # 2

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 24-148, dated 11DEC24

(B) EASA Airworthiness Directive: EASA AD 2023-0199 dated 17NOV23

(C) EASA Airworthiness Directive: EASA AD 2021-0281R1 dated 03AUG23

(D) A330 Airworthiness Limitations Section (ALS) Part 3: Rev 09, dated 01OCT24

(E) Airbus Alert Operators Transmission (AOT) A36L004-20 Rev 03, dated 10OCT23

(F) Airbus Tech Request (TR): 81480875

Commenter Request



Delta Air Lines requests that PAD 24-148 Ref (A) be revised to supersede/terminate EASA AD 2021-0281R1 Ref (C) Paragraphs (4) through (8) as the requirements of this AD were transferred into A330 ALS Part 3 Rev 09 Ref (D).

Request justification

EASA PAD 24-148 Ref (A) was issued on 11DEC24 to mandate that operators incorporate A330 ALS Part 3 Revision 09 Ref (D) into the operator's maintenance programs within 12 months after the AD effective date. The final rule proposed by this PAD will supersede EASA AD 2023-0199 Ref (B), which requires the incorporation of A330 ALS Part 3 Rev 08. A330 ALS Part 3 Revision 09 Ref (D) introduced the following new/revised maintenance requirements:

1. CMR 215000-00001-1-C/1-2-C/1-3-C - OPERATIONAL CHECK TO VERIFY ABILITY TO SHUT-DOWN BOTH AIR CONDITIONING PACKS FROM THE FLIGHT DECK
2. CMR 360000-00001-1-C - OPERATIONAL CHECK TO READ THE CMC FOR THE FOLLOWING CLASS 3 FAULTS OF THE BMC
3. CMR 360000-00002-1-C/2-2-C/2-3-C - DRIFT TEST OF THE EXCHANGER OUTLET TEMPERATURE SENSOR
4. CMR 360000-00003-1-C/3-2-C/3-3-C – OPERATIONAL CHECK OF CLOSING SIGNAL TO ISOLATION SOLENOID FROM BLEED/FIRE PUSHBUTTON SWITCHES
5. CMR 360000-00006-1-C - OPERATIONAL CHECK OF CROSSBLEED VALVE IN MANUAL MODE

All of these tasks contain a note that either "CREDIT CAN BE TAKEN FROM THE LAST INSPECTION IN ACCORDANCE WITH AOT A36L004-20 (EASA AD NO.: 2021-0281)" or "FIRST ACCOMPLISHMENT MUST BE CARRIED OUT NO LATER THAN THE AEROPLANE ACCUMULATING 2 000 FH SINCE AEROPLANE FIRST FLIGHT OR 2 000 FH SINCE THE LAST INSPECTION PERFORMED IN ACCORDANCE WITH AOT A36L004-20 (EASA AD NO.: 2021-0281) WHICHEVER OCCURS LATER"

Tasks 1, 3, 4, and 5 above are currently required to be accomplished per AOT A36L004-20 Ref (E) and EASA AD 2021-0281R1 Ref (C) Paragraphs (5) and (7) except at different intervals than those defined in A330 ALS Part 3 Rev 09 Ref (D). Task 2 above is currently required to be accomplished per AOT A36L004-20 Ref (E) and EASA AD 2021-0281R1 Ref (C) Paragraphs (4) and (6), except at different intervals as those defined in A330 ALS Part 3 Rev 09 Ref (D). Further, A330 ALS Part 3 Rev 09 Ref (D) removes the ability to defer up to 1500 FH (for A330-200s/-300s) or 400 FH (for A330-743Ls). EASA AD 2021-0281R1 Ref (C) Paragraph (8) specifies there are not any terminating actions for the maintenance actions.

NOTE: EASA AD 2021-0281R1 Ref (C) Paragraph (5) also requires the removal/visual inspection/installation of exchanger outlet temperature sensor. However, this was not added to the ALS as Airbus determined it to be obsolete (See Airbus TR 81480875 Ref (F)).

List paragraphs that change; describe (nonobvious) changes

Add Paragraph (6) titled "Terminating Actions to EASA AD 2021-0281R1 Requirements" which states, "Revising the AMP as required by paragraph (3) terminates the requirements specified in EASA AD 2021-0281R1 Paragraphs (4) through (8)."

EASA response:

Comment noted. EASA AD 2021-0281 has been revised (now at revision 2) to remove requirements now addressed in the ALS Part 3. No changes have been made to the Final AD in response to this comment.

