

EASA PAD No. 06-053
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>Reviewing the PAD-No. 06-053 "Inspection of forward pyramid and feeder harness" LHT has the following input:</p> <p>1.) According our experience with A/C from our customers e.g. GAF, NVJ and DLH we havn't had any findings which were related to the described incidents. In the AOT (and also the CN F-2004-039) there were different initial intervals mentioned: 10 days for PRE MOD 07591 and 600 FLH for POST MOD 07591. LHT supports the differentiation if the MOD 07591 has been embodied or not also for the release of PAD 06-053: Also in LHT opinion the risk of the occurence of an incident is higher if the related MOD 07591 is not embodied. Airbus should have all inspection reports available from the AOTs A310-54A2038 and A300-54A6037 which may also support this LHT experience. In addition to the (more important) technical aspect LHT see also an economical burden which will affect the operators with a repeating interval of 12 months. A repeating interval of 12 months is not very suitable with the maintenance schedules of the customers of LHT - and maybe also for many other operators. In addition operators of low utilization A/C are unconsidered in this PAD. From the technical point of view an incident can only occur during operation. To cover both commercial and low utilization A/C LHT would like to suggest a different repeating interval on a "months and flight hours, which ever comes later"-basis.</p> <p>2.) The initial interval of 6 months is expected to be a high burden for LHT and customers. It would be hard to plan this inspection within a short time period of 6 months after the effective date; specially for operators with a bigger A310-/A300-fleet. A different view may be necessary for operators which havn't accomplished the inspection until today. E.g. low utilization A/C with MOD 07591 - the inspection was necessary within 600 FLH acc. CN F-2004-039 which they may not reached until today.</p>	<p>Markus Marbach</p> <p>System Engineer Elec.Power, Lights, Fire Ext. & Avionic</p> <p>Lufthansa Technik AG</p>	21/03/2006	<p>Operators' comments have been reviewed and analysed by Airbus and the DGAC-F.</p> <p>Inspection intervals and grace periods were deeply evaluated in order to reach a position able to answer the airworthiness concern, but also limit as far as possible burden to operators. Based on the information collected so far in the frame of AOT (<i>A310-54A2038 and A300-54A6037, ndr</i>), and technical investigations of the phenomenon that can impair the pyramid structural integrity, inspection intervals and grace period are still considered relevant.</p> <p>In addition, it is reminded that a recommended modification (MSB A310-54-2039 and A300-54-6038) is now available, that is the terminating action to the repetitive inspections. Operators can get rid of the repetitive inspection by embodiment of this modification.</p>

	<p>Therefore LHT would like to submit an application to define different intervals with the release of the PAD 06-053:</p> <p>Initial interval:</p> <ul style="list-style-type: none"> - For A/C on which the CN F-2004-039 has already been accomplished: 12 months or 1000 flight hours whichever comes later - For A/C on which the CN F-2004-039 has not been accomplished: 6 months or 500 flight hours whichever comes later <p>Repeating interval:</p> <ul style="list-style-type: none"> - For A/C on which the Airbus SB A310-24-2028 or A300-24-6017 (MOD 07591) has been embodied: 24 months or 2000 flight hours whichever comes later (LHT suggests 24 months to fit into the C-Check and to cover future extensions of the C-Check) - For A/C on which the Airbus SB A310-24-2028 or A300-24-6017 (MOD 07591) has not been embodied: 12 months or 1000 flight hours whichever comes later <p>P.S.: The calculation of the flight hours is based on the assumption for DLH. These A300-A/C accumulated approx. 2000 flight hours per year. In LHT opinion this is a good approach to cover both commercial and low utilization A/C.</p>			
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