

EASA PAD No. 06-057R1
COMMENT RESPONSE DOCUMENT

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
General	<p>The following comments are equally applicable to PAD 06-056R1 and PAD 06-057R1</p> <p><u>Comment 1:</u> Regarding the method of control of the replacement of affected servocontrols, it is our understanding that the AD effectively introduces a fatigue life limitation for all S4 series spoiler servocontrols.</p> <p>It is our intention at Cathay Pacific/Dragonair to control this limitation through our Approved Maintenance Schedule (in an identical manner to the landing gear LLP's covered by MPD Section 9-1), by attaching a Mandatory life limit to the part (i.e 14000FC for PN S4-3000460-XX and 15000FC for PN S4-3000470-XX). A specific workcard based on the AMM part replacement instructions would be loaded to the aircraft fitted with the affected part before the life limit expires. For information, based on our part installation records we have 324 on wing parts plus 4 spares affected by this AD, so we are one of the organisations that are most severely affected by this mandatory requirement.</p> <p>The fundamental consideration is that the AD is applicable to the Component and not to the Aircraft itself, so to guarantee compliance with the AD requirements, the AD needs to be controlled on a component level. Therefore reference to replacement of parts per an SB (i.e. A330-27-3113 Rev 03 or later) is not entirely appropriate, because the SB is applied at aircraft rather than component level.</p> <p>Furthermore there are different life limits depending on the aircraft type that the component was installed on. There is no correlation between aircraft types - normally when there are different life limits depending on application, the operator shall apply Miners Rule to determine the remaining fatigue life of the part. This is not specified on the Service Bulletin or the PAD.</p>	<p>Martin Downey,</p> <p>Technical Services Engineer/Design Signatory</p> <p>Cathay Pacific Airways Ltd.</p>	22/05/2006	<p>The life limitation is applicable to component, but AD document is introduced at aircraft level.</p> <p>The aircraft is modified by SB when the SB is fully embodied. This SB is fully embodied when all Spoiler Servo-Controls S4 are replaced by 138X on the aircraft. The objective is to have all S4 Spoiler Servo-Controls replaced by 138X ones.</p>

	<p>Therefore I would propose to: Make the AD applicable to 'A330/A340 aircraft fitted with Spoiler Servocontrols PN S4 Series'. Introduce a Mandatory Life Limit related to the PN and application as applicable. Remove the specific requirement to embody SB 27-3113/27-4139, as the SB requirements are satisfied by the introduction of the mandatory life limit. Specify the Life Limit based on application (i.e. A330-200, A330-300, A340-300). Clarify if life limit adjustments are necessary (per Miners Rule) if the part has been previously installed in a different application.</p> <p>I would suggest that in future such mandatory fatigue life limitations could more appropriately be contained in MPD Section 9, as there appears to be a lack of consistency regarding how such life control requirements are handled. The compliance of life limit requirements by specific application of a Service Bulletin introduces AD control issues when the AD is specific to a component rather than an aircraft installation.</p> <p><u>Comment 2:</u> It is noted on the PAD that the requirement is clearly delineated that the S4 series servocontrol must be replaced with a 138X series servocontrol prior to accomplishment of 14000FC/15000FC depending on part number.</p> <p>We wish to point out that this prevents the installation of a 'younger' S4 series or MZ series servocontrol to replace a part that has reached the life limit. It is anticipated that the spares situation with Liebherr will be quite challenging and the ability to install replacement premod parts with life remaining will add flexibility and prevent unnecessary aircraft grounding.</p> <p><u>Comment 3:</u> The life history of all the spoiler servocontrols has been monitored since entry-into-service using an approved life control system (this is used to control all life controlled parts - e.g. landing gear, engine lifed components). One of the requirements of the AD is to physically inspect all of the spoiler servocontrols to check the PN and SN data. This causes an unjustifiable burden for those operators who are</p>			<p>The proposed AD wording is consistent with EASA policies and procedures.</p> <p>Done, the life limit is by PN and the position on aircraft of the S4 SSC.</p> <p>Due to specific Airworthiness Limitation Section on components and /or systems not yet available, the only current way to trace the mandatory life limits is the Modification SB and AD.</p> <p>Due to difficulty of management for exchange part between A330 and A340, AIRBUS and EASA have decided to not use this consideration and associated calculation rule, and then to simplify AD text rather than adding adjustment calculation. Introducing Miner Rule complication is not supported by EASA.</p> <p>The risk was found acceptable due to replacement of S4 by 138X SSC's.</p> <p>AD has been assessed with manufacturer production capacity, 138X Spoiler Servo Controls will replace S4 rather than managing life limitation on S4 SSC's. Of course, the pre-mod parts which are below the limit and with respect of interchangeability code can be embodied to avoid AOG situations.</p> <p>There is no intention to restrict identification to sole visual inspection on aircraft. It is agreed that operator may identify Spoiler Servo Controls by using APPROVED life control system records. The following "Note" has been added: In the frame of this identification,</p>
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	<p>monitoring the life history of the servocontrols. There should be a statement in the AD to allow the parts to be identified without physical inspection.</p> <p><u>Comment 4:</u> The AD states that a NEW 138X series servocontrol must be installed. Cathay Pacific has several serviceable 'used' 138X series servocontrols on hand as spares. The requirement to install a NEW servocontrol should be removed from the AD. In practice, the operator does not differentiate a NEW part and a SERVICEABLE part.</p> <p><u>Comment 5:</u> There is not mention of MZ series servocontrols for A330-300 and A340-200/300 aircraft. MZ series servocontrols are not affected by a life limit on this aircraft types. It is our position that, where applicable serviceable, MZ series servocontrols should be applicable to replace life-expired S4 series units.</p>			<p>AIRBUS SB A340-27-4139 Rev.01 / A330-27-3113 Rev.04 provides instructions for inspection and identification of Spoiler Servo Controls</p> <p>Agreed The word "New" is removed to allow installation of the new or serviceable used part.</p> <p>SB 27-3113Rev04 paragraph 1 L (config 2 for A330-300) / SB 27-4139 Rev01 paragraph 1 L provides information that MZ -12 SSC's are interchangeable 2 way with 138X SSC's</p>