



**COMMENT RESPONSE DOCUMENT**  
**EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-010**  
**CLOSED FOR COMMENTS ON: 02 February 2009**

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
General	<p>In response to Proposed Airworthiness Directive (PAD) 09-010, dated 12 January 2009, FedEx Express offers the following comments:</p> <ol style="list-style-type: none"> <li>1. The proposed Airworthiness Directive (AD) will be effective for 4 A300-600 and 2 A310-300 model airplanes operated by FedEx Express.</li> <li>2. FedEx Express has determined that the inspection threshold (6 months) and intervals (12 months) will fit within our planned scheduled maintenance checks. Therefore, there will be no impact to available lift.</li> <li>3. The number of man-hours and elapsed time to accomplish the proposed AD inspections will not impact the overall span-time of our planned scheduled maintenance check.</li> <li>4. The proposed AD inspections do not require any special inspection techniques, training or tooling. No special inspection techniques, training or tooling are required.</li> <li>5. FedEx Express has checked the availability of the SB kits and determined that 90 days is acceptable.</li> </ol>	<p>Wayne D. Richmond  Manager  Aircraft Structures Engineering  FedEx Express</p>	30/01/2009	EASA Position: No comment.
Compliance	<p>References:</p> <p>/A/ EASA PAD No.: 09-010 dated 12 January 2009  /B/ Airbus SB A300-54-6038, Revision No. 01, October 17, 2008  /C/ EASA AD 2006-0155 dated 01 June 2006  /D/ Airbus SB A300-24-6097, Revision No. 00, March 03, 2006  /E/ Airbus SB A300-54-6038, Revision No. 00, May 12, 2006  /F/ Docket No. FAA-2007-27012; Dir.Ident. 2006-NM-188-AD; Amendment 39-15017; AD 2007-07-15</p>	<p>Harry Demarest  Managing Director  AA Aircraft Engineering &amp; Systems</p>	<p>29/01/2009  (through e-mail from ATA dated 02/02/2009)</p>	<p>EASA Position :</p> <p>As per Standard Continued Airworthiness rules and practises, any inspection applicability, threshold and interval are based on technical data, risk analysis, etc</p> <p>One of the key points regarding the Continued Airworthiness process is also based on fleet consolidated</p>

	<p>American Airlines has reviewed ref. /A/, and finds that this proposed rule is currently effective to all of the AAL A300-600 fleet.</p> <p>AAL concurs with Airbus that replacing the cable clamp material from Teflon (PTFE) to aluminium via a new revision of the ref. /E/ service bulletin is the best solution that will provide a stiffer installation. Therefore there is no objection to the proposed rule concerning the "Additional work:" as stated under "Required Action(s) and Compliance Time(s):" item (5) on Page 2/3 of EASA Form 112, EASA PAD N0. : 09-010. However American does object to the restated requirement (item (3)) of this proposed rule that requires the sending of all inspection reports to Airbus within 30 days after each inspection is accomplished, in accordance with the ref. /D/ service bulletin.</p> <p>The reporting of such findings within a specified time period has no affect on improving safety and should not be a requirement mandated by a government authority. AAL understands that it is in the operator's best interest to provide such reports to Airbus to supplement the in-service data already available. However, Airbus should have sufficient data by this time to validate the risk model. If the inspection and repair criterion is adequate and the interval appropriate, it should mitigate the unsafe condition to within the statistical goals thus making operator reporting a redundancy. AAL believes there is no value added to the process and this only provides an unnecessary and non-safety related compliance item to the directive.</p> <p>AAL is requesting the item (3) under "Required Action(s) and Compliance Time(s):" on Page 2/3 of EASA Form 112, EASA PAD 09-010 be removed as a requirement from this PAD and subsequent AD. If this is not found acceptable then at a minimum AAL is requesting the 30 day calendar requirement be removed as this reporting period is not even required by the ref. /D/ service bulletin.</p>			<p>experience. Therefore, EASA confirms as essential that American Airlines provides accurate feedback regarding the initial inspection performed by submitting an inspection report (whatever finding or no finding) in due time.</p> <p>However, regarding the inspection report to be submitted following repetitive inspections, EASA supports American Airlines request in modifying the paragraph 3 of the Required Actions. This paragraph is amended as follows :</p> <p><i>'Within 30 days after initial inspection as required by this AD and, thereafter, after each inspection, in case of finding only, send the inspection report to Airbus in accordance with instructions of Airbus SB A310-24-2100 or A300-24-6097 or A300-24-9010, as applicable to aircraft model.'</i></p>