



**COMMENT RESPONSE DOCUMENT**  
**EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-012**  
**CLOSED FOR COMMENTS ON: 16 April 2009**

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
General	<p>In response to the Notification of a Proposal to Issue an Airworthiness Directive (PAD No. 09-012), dated 19 March 2009, FedEx Express offers the following comments:</p> <p><b>1-</b> The proposed Airworthiness Directive will be effective for 29 A300-- 600 airplanes operated by FedEx Express. FedEx Express has determined that the inspection threshold of 6 months after the effective date of the AD allows sufficient time to accomplish the inspection during a scheduled maintenance check (B-check). Therefore, there will be no impact to available lift. However, if cracks are found, significant aircraft downtime will be required (approximately 42.0 hrs).</p> <p><b>2-</b> 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, unless cracks are found (see previous comment).</p> <p><b>3-</b> The proposed AD inspections do not require any special inspection techniques, training or tooling. FedEx Express has checked the availability of the SB kits (required for repair) and they are readily available.</p> <p><b>4-</b> All A300-600 aircraft modified per Airbus SB A300-57-6053 (Mod 10453) are susceptible to fatigue cracking of the Frame 40 Fwd Fitting at the spot-faced hole. How does a one-time inspection ensure the continued airworthiness of these aircraft? Does Airbus intend to create an ALI inspection task to inspect this area?</p>	Wayne D. Richmond, FedEx Express	13/04/2009	<p><b>EASA position :</b></p> <p><b>1- No comment</b></p> <p><b>2- No comment</b></p> <p><b>3- No comment</b></p> <p><b>4-</b> This AD makes a distinction between the aircraft which have received Airbus SB A300-57-6053 (Mod 10453) before developing cracks (preventive measure) or after having developed cracks (repair solution).</p> <p>In other words, only the A300-600 having received the Airbus SB A300-57-6053 (Mod 10453) as a preventive disposal are concerned by these AD requirements.</p> <p>A300-600 aircraft having received the Airbus SB A300-57-6053 (Mod 10453) as a corrective/curative action are not concerned by these AD requirements.</p> <p>This precision has been added in the 'applicability' section of the AD.</p> <p>The airworthiness issue is then identified once the Airbus SB A300-57-6053 (Mod 10453) has</p>

				<p>been applied without detection of cracks, and the one-time inspection is required to check that, since the application of the Airbus SB A300-57-6053 (Mod 10453), cracks have not developed.</p> <p>To support the inspection, the associated SBs propose a more accurate inspection technique to track crack initiation.</p> <p>The efficiency of the Airbus SB A300-57-6053 (Mod 10453) has been re-challenged and found to be an adequate preventive / corrective means, if applied without crack initiation. The new one-time 'more accurate' inspection will determine if the application of the MSB has been done properly.</p> <p>For the long term action, if the one-time inspection should reveal a large impacted population, and invalidate the benefit of the MSB implementation, further adequate action will be evaluated. Up to now the current action plan does not include any future ALI inspection task.</p>