



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-042
 CLOSED FOR COMMENTS ON: 19 March 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required action and Compliance Time	<p>PARA 3 Last Paragraph is not clear as to whether it is meant to be <u>more</u> or <u>less</u> restrictive? e.g.</p> <p>"The 12-month compliance time stated in the ROR page of AIRBUS A330 ALI Document reference AI/SE-M4/95A.0089/97 issue 16 is <u>not applicable</u> to the implementation of the reduced intervals of the following tasks. For these tasks, the interval to be considered is that stated in AIRBUS A330 ALI Document reference AI/SEM4/95A.0089/97 issue 16:"</p> <p>i.e. Grace period can <u>not</u> be applied, and Interval defined in ALI Rev 16 is to be used.</p> <p>Then the Para goes on to state (what appears to be optional);</p> <p>"Task reference 574109-02-02, 575022-01-05, 575053-01-02 and 575055-01-02.</p> <p>When the first accomplishment of these tasks has occurred so early that the period between the first accomplishment and the threshold stated in AIRBUS A330 ALI Document reference AI/SEM4/95A.0089/97 issue 16 is greater than the required interval, the next inspection <u>can</u> be performed, either:</p> <p>- At the threshold stated in AIRBUS A330 ALI Document reference AI/SE-M4/95A.0089/97 issue 16, or</p>	<p>Ken Delaney</p> <p>Aer Lingus Engineering</p>	20/02/2009	The text of paragraph 3. in the AD Required action and Compliance Time Section has been modified in order to clarify the requirements (See AD §3.).

	<p>- At the adapted threshold, if any, stated in Table 2 of this AD.</p> <p>Question:</p> <p>Please advise if operators can use the new reduced Intervals (even if the period between the first accomplishment and the threshold stated in AIRBUS A330 ALI Document reference AI/SEM4/95A.0089/97 issue 16 is greater than the required interval) ?</p> <p>Example task 574109-02-02:</p> <p>Threshold - 17,000FC OR 54,300FH</p> <p>INT - 5,800FC OR 18,500FH</p> <p>A/C Last inspected @ 10,632FC and 45,331FH</p> <p>i.e. period is greater than INT for the FC parameter (6,368FC & 8,969FH) - 568FC greater than INT, but using Threshold is more restrictive.</p>			
Effective Date	Please confirm that the effective date of the AD is not before beginning of July 2009	Beat Ritzmann Maintenance Program Manager SR Technics Switzerland Ltd	18/03/2009	In accordance with EASA continuing airworthiness procedure, the AD will be effective 14 days after its issue date.
Required action and Compliance Time	<p>For your information, we are finishing (next week) our series of C-Checks. As much inspections as possible were added to the existing bills of work. This is why we don't need some Table 2 adaptations anymore.</p> <p>As some reductions in ALI thresholds and/or intervals are of a quite important amplitude, this leaves us with some individual issues we were not able to solve. These are described in the here under tables.</p>	Luc Josset Engineering Department Maintenance & Engineering Brussels Airlines	20/03/2009	The operator is covered until 04 November 2009. AIRBUS has initiated calculations for adapted thresholds and intervals as requested. AIRBUS will request later on an AMOC to EASA.

1. EASA PAD 09-042 - Table 2.

1.a. Adapted Thresholds no more required as Initial Inspection is already performed or planned for next week.

REFERENCE	Applicability
572006-02-04	MSN 030
	MSN 037
	MSN 045
572030-01-05	MSN 082
575011-01-05	MSN 030
	MSN 037
	MSN 045
575022-01-05	MSN 030
	MSN 037
	MSN 045

1.b. MSN's requiring a one time adapted Threshold to reach the next C-Check.

REFERENCE	FH	FC	Applicability
545104-02-03	60,500	17,800	MSN 037
	60,800	17,400	MSN 045
545180-04-04	54,800	16,900	MSN 082
572006-02-04	54,800	16,900	MSN 082
575011-01-05	54,800	16,900	MSN 082

2. EASA PAD 09-042 - Table 3

2.a. MSN's requiring a one time adapted Interval to reach the next C-Check.

REFERENCE	FH	FC	Applicability
533113-01-04	23,400	5,700	MSN 082
533165-01-02	26,700	6,200	MSN 030
572064-01-06	22,800	5,600	MSN 082
572068-01-05	22,800	5,600	MSN 082
575022-01-05	22,800	5,600	MSN 082