



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-066
CLOSED FOR COMMENTS ON: 01 June 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	<p>In response to Proposed Airworthiness Directive (PAD) No.: 09-066 dated 11 May 2009, FedEx Express offers the following comments:</p> <p>1. The proposed Airworthiness Directive (AD) will be effective for 66 A300-600 model airplanes operated by FedEx Express. All of our aircraft are fitted with Airbus modification No. 03986 (current frame foot reinforced).</p> <p>FedEx Express has determined that the modification threshold will fit within our planned scheduled maintenance checks, except for three aircraft. Aircraft MSNs 358, 361 and 365 currently have 33,639, 34,598 and 34,867 Flight Cycles respectively and with the current utilization and maintenance schedule projection, will need special visits if we do not get a grace period.</p> <p>Therefore, we are requesting a grace period of 500 flight cycles [to] be included in this PAD for aircraft in post Airbus modification No. 03986</p> <p>2. Since the number of man-hours and elapsed time (more than 200 man hours/aircraft) to accomplish the proposed AD modification will impact the overall span-time of our planned scheduled maintenance checks, a grace period for the modification threshold will eliminate special scheduling and lift deficiency.</p>	Gibby Thomas, FedEx Express	21/05/2009	<p>1. Noted.</p> <p>2. EASA does not normally approve AD time extensions based upon operational considerations. Such requests are routinely handled by the respective State of Registry. As a consequence, the commenter should contact the NAA of the State of Registry of the affected aeroplane(s).</p> <p>In addition, the threshold determination is the result of computation, in which usual safety margins have been applied. As a consequence the 'grace period' is already included in the required threshold.</p>
<p>Requirements and Reference Publication of the PAD 09-066 have been changed, prompting the issuance of PAD 09-066R1 for further consultation.</p> <p>The Airbus Service Bulletin (SB) A300-53-6161 Original Issue has been superseded by Airbus SB A300-53-6161 Revision 1.</p> <p>A paragraph (2) has been inserted in the Required Action(s) section of the revised PAD, in order to address aeroplanes on which the Airbus SB A300-53-6161 Original Issue may have already been applied.</p>				