



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-077
CLOSED FOR COMMENTS ON: 26 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>Lufthansa Technik would like to comment on the repeat interval of the inspection per SB A300-53-0388/A310-53-2131/A300-56-6164.</p> <p>As per PAD, "Required Action(s) and Compliance Time(s)", par (2), the detailed inspection shall be repeated at intervals not to exceed 2.300 FC or 30 months, whichever occurs first.</p> <p>The airworthiness concern addressed by PAD 09-077 is related to fatigue cracking of the NLG bay beam web at FR15A at one 101VU attachment fitting. Crack growth is driven by cyclic loading of the structural member. Crack growth is not driven by calendar time.</p> <p>Lufthansa Technik believes that an inspection interval given in flight cycles is sufficient to address the above airworthiness concern.</p>	Thomas Kehse, Lufthansa Technik	12/6/2009	<p>EASA agrees with Lufthansa Technik view regarding crack growth driving criteria as being solely cyclic related.</p> <p>The calendar time (30 months), indicated in § (2) of the required action section and concerning the detailed inspection interval, will be removed from the Final AD.</p> <p>However, the '<i>Within 2.300 FC or 30 months after the effective date of this AD, whichever occurs first</i>' compliance time of § (1.2) will remain as it addresses the threshold for the initial inspection.</p>
General	<p>In response to Proposed Airworthiness Directive (PAD) No.: 09-077 dated 29 May 2009, FedEx Express offers the following comments:</p> <ol style="list-style-type: none"> 1. The proposed Airworthiness Directive (AD) will be effective for 71 A300-600, 15 A310-300 & 51 A310-200 airplanes operated by FedEx Express. 2. FedEx Express has determined that the modification threshold will fit within our planned scheduled maintenance checks and therefore will not affect our revenue operations. 	Wayne D. Richmond FedEx Express	17/6/2009	Noted.