COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-122
CLOSED FOR COMMENTS ON: 04 November 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	On para. (1), pertaining to P/N and/or S/N that cannot be identified. - While instructions are clear in case of discovery of unidentifiable units, the repercussion on timely completion of required tasks, manpower allocation and logistics can be a concern, especially when several gearbox assemblies cannot be identified (e.g., due to missing identification plates). This can result in doing unnecessary work on units that may not be affected. Therefore, consultation may have to be made first with Hamilton Sundstrand to establish the correct P/Ns and S/Ns of the affected units, before resuming the final corrective action of screw replacement or gearbox assy. removal. Hamilton Sundstrand should anticipate such scenario and the request for assistance from operators in re-establishing the correct P/N and S/N of individual gearbox assemblies (that cannot be identified/may be found without identification plate). It was noted, likewise, that the Hamilton Sundstrand SB ERPS06G-29-6 that AOT A330-29A3110 and AOT A340-29A4285 cross-refer to, does not provide enough information on industry support in the event of gearbox assy. removal, e.g. provisioning of seed/exchange unit; nor, the offer for replacement identification plates. The latter could be commercial in nature, but could impact timely compliance especially for aircraft that are due for operational check, or where RAT ground test is required for whatever reason. On para. (2), Reporting of inspection results, 30 days would be more achievable vs. 10 days.	Arnelou Badiola Cathay Pacific Airways Limited	08/10/2009	**Answer to query paragraph (1):** The AD requires corrective action in the situation where P/N and/or S/N cannot be identified. However, according to data provided by operator, Hamilton Sundstrand may provide information on units not having identification plates. **Answer to query paragraph (2):** -refer to comment answer 2 below of this CRD-

Applicability / Required actions and Compliance Time	I would like to send you the following comments for your review and consideration before definitive issue of the AD. On the applicability section you are referring as affected all A/C, all MSN if equipped with a Hamilton Sundstrand RAT turbine lower gear box assy, as identified by P/N in Hamilton Sundstrand SB ERPS06G-26-6 or SB ERPS33G-29-1. Nevertheless, there is a well determined batch Serial Number (S/N) of gear boxes, which are really affected by this issue. Therefore the correct effectivity should consider this fact and restrict the applicability to the A/C, MSNs equipped with a Hamilton Sundstrand RAT turbine lower gear box assy, as identified by P/N **and S/N** in Hamilton Sundstrand SBs ERPS06G-26-6 or ERPS33G-29-1. In the required actions and compliance time section, paragraph (1), the PAD requires identification of the P/N and S/N of the RAT turbine lower gear box assy. My understanding in this instruction is that the RAT must be visually inspected to determine P/N and S/N, i.e. the AD compels to a physical inspection of the RAT turbine lower gear box assy. Although this component is not life limited, many operators keep records and track P/N and S/N of the RAT and also of the RAT turbine lower gear box assembly installed on every A/C of its fleet as well as FC and FH accumulated by the components. It should be somewhere highlighted that checking aircraft records for PN and/or S/N (if available) of gear box assy installed is acceptable to comply with the AD requirement. I am aware of the certainly limited room for such considerations within the AD. However, in some cases in the past, EASA has considered this by requiring implementation of an Airbus SB where instructions of checking aircraft records were included (refer to EASA AD 2006-0158). As in this case the AOTs do not mention this possibility, the EASA should consider to include this information in the AD or liaise with Airbus to amend subject AOTs in this regard. On the same section, paragraph (2), the PAD requires reporting of the inspection results, including NIL findings, within 10 days. The timeframe for reporting is excessively short. If this inspection is done out of schedule, it is very likely that reports within 10 days would be possible for any MRO. Nevertheless, if this inspection is carried out during a base maintenance check, it might be take more time for the inspection to be reported as the inspection is encompassed with several others and documentation is likely to be issued at the end of the layover. In the last time the EASA is often requiring reporting of the inspection results within a relatively short	Elvio Damian Marinelli Lufthansa Technik AG	15/10/2009	1/ The applicability of this AD is at the level of part numbers. As only a specific batch of S/N is impacted, we need to identify the suspected couple (P/N and S/N). Thus this identification is considered an action in the frame of AD writing policy. Also it will avoid having any mandatory replacement missed due to a discrepancy between records and current aeroplane component situation some organisations may have at one point in time. 2/ The 10-day reporting time is the same for the A320 family and the A300/A310 family, for which a PAD has been simultaneously published for the same purpose. No comments have been received on this issue on these two programmes. For that reason, it is proposed to keep it unchanged.

	timeframe (see EASA 2007-0314 or 2008-0223 as an example), seemingly with the aim to ensure reporting to the A/C manufacturer is made. Sometimes the EASA has needed to rectify reporting timeframes (see EASA 2008-0093) because it was obvious that initial selected one could not be reached. In this case, the same will happen, therefore the EASA should consider to require inspection reports within a reasonable or achievable timeframe. A minimum of 30 days should be given. On the same section, paragraph (3), it is forbidden to install affected RAT turbine lower gear box as identified by P/N in the HS SB ERPS06G-26-6 or SB ERPS33G-29-1, unless it has been inspected and, if necessary, corrected in accordance with the requirements of this AD. Here, again, reference should be made to the P/N **and S/N** as identified in the SB ERPS06G-26-6 or SB ERPS33G-29-1.			3/ This last comment is linked to the first one. See above