


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 09-134 [Published on 27 November 2009 and officially closed for comments on 25 December 2009]</p>

Commenter 1 : FedEx Express – Jonathan Parish – 7/12/2009

Comment # 1

References:

/A/ PAD No. 09-134, dated 27 November 2009
 /B/ EASA AD 2009-0166
 /C/ Airbus AOT 55A2048R2
 /D/ Airbus AOT 55A6047R2
 /E/ Airbus TD/K4/S1/27583/2009 Issue E

In response to the Notification of a Proposal to Issue an Airworthiness Directive (PAD No. 09-134), dated 27 November 2009, FedEx Express offers the following comments:

1. The proposed Airworthiness Directive will be effective for the following 6 FedEx rudders as per Ref /E/: TS-2022, HF-1017, HF-1020, HF-1059, HF-1087, HF-1061. The new requirements of this proposed AD (versus Ref /B/) are only applicable to rudders with repairs in the reinforced area. Since FedEx has no rudder with such repairs, these new requirements are not applicable.
2. FedEx Express has determined that the inspection thresholds and intervals allow sufficient time to accomplish the inspections during scheduled maintenance checks. Therefore, there will be no impact to available lift.
3. 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 checks. If delaminations are found which require repair, FedEx has sufficient spare rudders to prevent excessive ground time.
4. The proposed AD inspections (ELCH, Vacuum Loss, Thermographic, and Ultrasonic) require special inspection techniques, training, and tooling. Airbus has made the training and tooling available to the operators.

EASA response: Noted.