

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-018 [Published on 17 February 2010 and officially closed for comments on 17 March 2010]

Commenter 1 : Kingfisher Airlines Ltd – P.Gopinath – 26/02/2010

Comment # 1

1. Para 7 on the compliance action “ Modification of elevator servo-controls installed on A330-200 aeroplanes”.
 - Our aircrafts are complied with MOD 53977 in production. However, other MOD's given in the SB are not reflected in the aircraft fit list. Therefore request to clarify if other MOD given in the SB A330-27-3134 needs to be complied as requirement of this AD.
2. Also para 10 requirement is to be complied with SB A330-27-3136. Our aircrafts are embodied with MOD 54833 in production and other MOD's are given in the SB A330-27-3136 are not embodied. Please clarify if we need to perform the SB again or can we take as para 10 complied as per the AD.
3. The applicability column states that if MOD 53969 or 54833 has been embodied the para 1,2 and 4 as per the AD is not applicable. However in para 10 it states that SB A330-27-3136 needs to be complied on which we have been embodied only with one MOD. Therefore kindly clarify the applicability of the AD.

EASA response:

Comment #1 (Paragraph (7)) response:

AIRBUS has sampled one of the aeroplane delivered to Kingfisher and checked the conformity to design standard “modification list”.

On this sampled A/C, MOD.53977 could not be identified in this list; however 53969 and 54833 are listed fully embodied. Kingfisher needs to review its “modification list” to check above mentioned production modifications.

If the aeroplane configuration has not changed regarding these components since original delivery, the aeroplane is still compliant with the requirements of PAD 10-018 paragraph (7).

MOD.53969 is at the same time a production modification and a service bulletin modification, other MODs listed in SB A330-27-3134 are modifications raised for SB purpose only.

Comment #2 (paragraph (10)) response:

If production MOD 54833 has been fully embodied on your aeroplanes and A/C original delivery configuration has not changed regarding these components since original delivery, A/C are already in compliance with AD requirements for paragraph (1), (3) and (4) as detailed in applicability section.

Airbus MOD. 54833 is at the same time a production MOD and service bulletin MOD whereas other MODs listed in Airbus SB A330-27-3136 are MOD raised for SB purpose only

Comment #3 (Applicability) response:

It is the same as in the above responses. This is due to the fact that there are modifications dedicated to embodiment on aircraft already in-service. The modification mentioned is at the same time a production MOD and service bulletin MOD whereas other MODs listed in Airbus SB A330-27-3136 are MOD raised for SB purpose only.

Commenter 2: Virgin Atlantic Airways Ltd – Rick Boyes – 11/03/2010**Comment # 2**

- VIR believe that the modification of both FCPCs and FCSCs (SBs A340-27-4144 and A340-27-4155 in the case of our A340-300 fleet) should also cancel the MMEL temporary revisions as detailed in PAD section (3.3). The current PAD only states the cancellation of section (3.1) upon completion of the reference modifications.
- There is no direct reference to the cancellation of OEBs associated to the operational restrictions. Upon completion of the reference modifications (FCPC and FCSC) the PAD states section (3.1) requirements can be cancelled. On the A340-300 fleet this is covered by RED OEB 54. VIR believe there should be a direct reference to the cancellation of this RED OEB (and others potentially issued on other aircraft types) once referenced modifications have been completed. Airbus SB A340-27-4144 (FCPC L20 on A340-300) makes reference to an EASA AD being issued to allow cancellation of OEB 54, VIR therefore believe this should be referenced the final Airworthiness Directive.

EASA response:

Comment #1 (first bullet) response:

Airbus provided us with the following information:

When the modification for both FCPCs and FCSCs are embodied, Airbus considers that the AMM task 27-93-00-040-801 associated with MMEL item 27-93-01-A PRIM

1 will need to be revised. In the paragraph 4 "Procedure" A "Deactivation of the Flight Control Primary Computer 1 (FCPC); the light Step 1 will be removed from the AMM task:

QUOTE

- LB ELEVATOR SERVOCTL MODE XDRC (3CS1) in Class 1
- RY ELEVATOR SERVOCTL MODE XDRC (3CS2) in class 1
- FCPC1/WRG:L B ELEV SERVO MODE XDRC in class 1
- FCPC1/WRG:R Y ELEV SERVOCTL MODE XDRC in class 1
- FCSC1/WRG:L B ELEV SERVO MODE XDRC in class 3
- FCSC1/WRG:R Y ELEV SERVOCTL MODE XDRC in class 3.

UNQUOTE

Airbus considers that this small step is not a burden among the 29 steps and advised EASA that it will be removed in the frame of the next general revision (October 2010) of the AMM and the MMEL.

Comment #2 (second bullet) response:

PAD 10-018 paragraph 9 cancels action of paragraph 3.1, which concerns Airplane Flight Manual.

AFM are EASA approved documents, whereas OEBs are not EASA approved, this is the reason why OEBs cancellations are not mentioned in AD scope.

Further to this, Airbus advised EASA that the OEB 54 for A340 aircraft has been revised (Issue 5 in August 2008) to incorporate the FCSC & FCPC combination, as one of the fix of the OEB.

Commenter 3 : Deutsche Lufthansa AG – Brigitte Gilles – 17/03/2010

Comment # 3

SB A340-27-4144 describes the new elevator position monitoring function, that allows the cancellation of the red OEB # 54 if FCPC standard acc. SB A340-27-4144 and FCSC standard acc. SB 27-4145 or SB 27-4146 are embodied. Acc. SB A340-27-4144 it is anticipated that an AD will be issued to cancel this OEB # 54 together with AFM No 4.02.00/25. The cancellation of AFM 4.02.00/25 is part of PAD 10-018 but we did not find the cancellation of OEB#54 as announced in SB A340-27-4144.

Also the cancellation of OEB # 50 on A330 A/C is not included in PAD 10-018 (see SB A330-27-3144).

Please consider to incorporate the cancellation of the a.m. OEBs as already announced in the SBs into the AD.

EASA response:

PAD 10-018 paragraph 9 cancels action of paragraph 3.1, which concerns Airplane Flight Manual.

AFM are EASA approved documents, whereas OEBs are not EASA approved, this is the reason why OEBs cancellations are not mentioned in AD scope.