


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-019 [Published on 19 February 2010 and officially closed for comments on 19 March 2010]

Commenter 1 : EVA Airways Corp. – Jacky Chen – 23/02/2010

Comment # 1

According to this PAD, it requests to complete all of the modification within 3,600 flight hours after effective date of this AD.

In order to modify this connector, we need to remove some access panel first, and this job usually goes during heavy maintenance schedule (C check). The actual man hours for this modification is 26 for one aircraft.

Considering the EVA A330-200 heavy maintenance schedule, It is difficult for EVA to accomplish this modification within 3,600 flight hours.

Since this is critical issue for airlines, EVA do expect that EASA could understand the difficulties which the airline is facing. Therefore, EVA would like to ask your kindly assistance to grand our request for extending the compliance date to 6,000 flight hours or 1 year.

EASA response: This issue has been widely discussed and it is common Airbus/EASA position not to extend the compliance time considering the potential criticality of the unsafe condition: such an event, in combination with fuel leakage, may lead to an uncontrolled fire. Thus the comment is not agreed and the AD compliance time remains at 3600 FH.

Commenter 2: China Airlines – Joseph Hsu – 24/02/2010

Comment # 2

In order to modify 3 connectors, several access panels need to remove in advance, also special pneumatic crimping tool is required to perform this modification. This job is usually arranged during China Airlines heavy maintenance schedule (C Check). The modification is required about actually 25 MH for each aircraft.

Considering the China Airlines A330-300 & A340-300 heavy maintenance schedule, We appreciate if EASA could extend the AD compliance date from 3600

FH to 18 month (C Check).

EASA response:

See response to Comment #1.

Commenter 3 : Air France – Eric PESCE – 24/02/2010

Comment # 3

For the moment, required actions and compliance times are the following ones in the PAD :

Within 3600 FH after the effective date of this AD, modify the Hydraulic pump electrical motor connectors of the Blue, Yellow and Green electric pumps in accordance with the Airbus Service Bulletin A330-92-3088 Rev 00 / A340-92-4081 Rev 00 for AFR A330 and A340 fleets.

Considering the significant number of aircraft to be modified and the possible ETOPS problems on our A330 fleets linked to this modification embodiment, we would like to have a compliance time to do these modifications equal to a check C for AFR fleet and thus to 24 months after the effective date of this AD instead of 3600 flight hours.

EASA response:

See response to Comment #1.

Commenter 4: Cathay Pacific Airways – Kelvin To– 25/02/2010

Comment # 4

The subject SB installs heat shrink to the Elec Hyd Pump connectors to prevent fluid ingress and will be subject of an AD.

When doing the SB on older aircraft, the connector may be damaged on pin extraction or it may be found in non-perfect condition, in such case it will need to be replaced, as Cathay Pacific already experienced.

Connector E0233-24-10SN (and alternatives in IPC) has an ordering lead time of 120 days (as well as costing \$2500 ea). With anticipated compliance of 3600FH and 70 LR aircraft to do, it becomes a concern in terms of time.

Requests :

- (1) Can Airbus please assist sourcing the connector with reasonable leadtime, and ensure adequate supply of these connectors before the AD is released.
- (2) The AD is at proposal status, can Airbus please work with EASA for a longer compliance time.
- (3) The connectors are MIL-C-5015 spec, there are alternate pn in the market that can increase the availability of these connectors, however these alt pn are not authorized by Airbus. I have no information if these alternate pn subject to the same fluid ingress problem, but even so the same heat shrink mod can achieve the intent.
- If Airbus cannot guarantee availability of E0233-24-10SN connectors within time scale of the AD, can Airbus study and consider authorising the use of alternate MIL-C-5015 spec pn, and reflect in the appropriate documents.

EASA response:

See response to Comment #1.

Furthermore, Airbus studied and validated one interchangeable connector (MS3456KT24-10S) to replace connector E0233-24-10SN, which will be the only alternate connector validated by Airbus.