


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-036 [Published on the 20 April 10 and officially closed for comments on the 18 May 10]

Commenter 1 : AIRBUS – David MANZONI – 22 April 2010
Comment # 1

“1) The paragraph “Reason” indicates that:

QUOTE

This new AD retains the requirements of [...] EASA AD 2008-0152 [...]

UNQUOTE

EASA **AD 2008-0152** mandates the A330 and A340 ALS Parts 1 **revision 02** (or later approved revisions).

This **new AD** mandates the A330 and A340 ALS Parts 1 **revision 04** (or later approved revisions).

Our understanding is that this new AD does not retain the requirements of AD 2008-0152 but cancels and replaces it (i.e. supersedes it).

In order to avoid any misinterpretation, please could you review the possibility to delete AD 2008-0152 from this paragraph?

2) The paragraph “Required action(s) and Compliance Time(s)”, paragraph (1) indicates that:

QUOTE

Comply with all applicable maintenance requirements and associated airworthiness limitations included in Airbus A330 and A340 ALS part 1 revision 04, as applicable.

UNQUOTE

Airbus thinks that “as applicable” can be confusing for Operators.

The use of “as applicable” may lead an A330 Operator to incorrectly consider life limitation applicable to A330 only.

The life limitation must be adjusted when life limitation applicable to past and present application are different. This adjusted life limitation must be reassessed every time the part’s life limitations change for current and/or previous aircraft application(s) the part is/was fitted to.

As a consequence an A330 Operator must take into account, as appropriate:

- Life limitations applicable to A330 and A340 (for a component previously installed on A340 and currently installed on the A330 he operates),
- or
- Life limitations applicable to A330 only (for a component hat has never been installed on a A340)

Please could you review the possibility to replace “as applicable” by “as appropriate”?”

EASA response:

1. In order to cover the transition period between ALS Part 1 Revision 03 and Revision 04 as stated in the ROR, the content of last paragraph of reason section and paragraph (1) of RACT section have been reworded.

2. We disagree because “as applicable” is a common AD wording. In addition, this comment is already covered by §6 of Sub-part 1-0 of ALS Part 1. For harmonization reason, we will add just after as applicable “to the aeroplane model”

Commenter 2: Deutsche Lufthansa AG –Brigitte GILLES – 07 May 2010

Comment # 2

“Regarding the PAD 10-036 (Time Limits and Maintenance Checks - Safe Life Airworthiness Limitation Items - ALS Part 1 Amendment), which was published April, the 20th 2010, Lufthansa has a comment to the upcoming AD.

As our understanding the upcoming AD should also supersedes EASA AD 2009-0192, which required to incorporate A340 ALS Part 1 revision 03.”

EASA response:

We disagree, because AD 2009-0192 requirements have been partially introduced in the A340 ALS Part 1 revision 04 due to a typo. Therefore this new AD cannot supersede EASA AD 2009-0192, that must still remain in force pending correction of the A340 ALS Part 1 (at the opportunity of its revision 05).