


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-110 [Published on 13 October 2010 and officially closed for comments on 10 November 2010]

Commenter 1 : Nouvelair (Sabena Technics Mir) – Helmi Touel – 14/10/2010

Comment # 1

We have several remarks about PAD 10-110 :

- 1- It will be valuable to add the FIN NUMBER of the affected release cable. According to our IPC , it should be 5030WM/5031WM
- 2- How can we check if P/N L32A319-160-001 is installed or not? Is there any Id on the cable to do that?
- 3- On old A/C (Exemple MSN222), this cable correspond to FIN 5000WM/5001WM. Should we check those A/C ? or should we consider that they are not affected?
- 4- According to IPC, P/N L32A319-160-001 is installed on MSN 1121,1175,1744,3480, but the applicable SB 53-1227 (for corrective action) is only applicable to MSN 3480. What should we do in this case?

EASA response:

1 – The FIN NUMBER is available in the associated Airbus Service Bulletin. Airbus advised that there is no other FIN where the affected P/N can be installed according to Airbus instructions. We therefore do not see any added value to quote it in the AD.

2 – According to Airbus, the identification of the P/N is possible on the cable itself, close to the extremity.

3 –Such old aeroplanes shall normally not be affected as they were not fitted originally with the affected P/N. Nonetheless, it can have been replaced in service by the affected P/N.

4 – The SB effectivity is not the way to determine whether an aeroplane is affected by an AD or not, as aeroplane configurations changes all the time. What is to be considered is the AD applicability. There is a 2-way interchangeability in the IPC between the affected P/N and the P/N installed on the mentioned MSN, which means the affected cable can have been used as replacement for the cable previously installed on an aeroplane.

The Final AD has been amended to apply to ‘all serial numbers’ aeroplanes, while the already-compliant configurations are included in the ‘Required Actions’ section. The Final AD prohibits (re)introduction of P/N L32A319-160-001 cables for all aeroplanes.

Commenter 2: Thomson Airways Ltd – Stewart Loft – 26/10/2010**Comment # 2**

Under Required action(s) and Compliance Times(s) para (3) Reference is made that “due to ACT provision constitutes an amoc.....”
For operators who cannot access the referenced ATA 28 SB's due to the non-applicability to their fleet, the acronym ACT is non specific.
It should be spelled out that the referenced ATA 28 Service Bulletins deal with the provision of an Additional Centre Tank. (ACT).
Connection between ATA 53 and ATA 28 is not made obvious.

EASA response:

Comment agreed. The Final AD has been amended to add an explanation for the acronym ACT.