

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-112 [Published on the 25 October 10 and officially closed for comments on the 22 November 10]

Commenter 1: Air France Industries – Pascal Dumez – 26 October 2010

Comment # 1

1) Why this AD "mandate" the A330 ALS part 1 Rev 04 and doesn't cover the A330 ALS part 1 Rev 05 even if this revision concerns only the freighters?
 2) why the freighters are not concerned by this AD? This would answer the first point.
 3) The proposed AD will replace the AD 2010-0131 for the A330.
 But for the A340 the proposed AD will replace only the AD 2009-0192 (main fitting concern) why not also the 2010-0131 which is applicable to the A340 and "mandate" the rev 04?
 This would avoid complexity in terms of traceability and follow up of multiple AD for the same subject.
 The current situation may lead to confusion for operators.

EASA response:

1) and 2) The applicability of the A330 ALS Part 1 at Revision 05 includes the freighter models. This document at Revision 05 is considered as part of the Freight Type Certification Documents. Consequently, there is no need to mandate the A330 ALS Part 1 at Revision 5 for the freighter models. Furthermore, the A330 ALS part 1 at Revision 5 does not introduce any restrictive maintenance requirements and/or airworthiness limitations for the other A330 models in service.
3) Both EASA AD 2009-0192 and EASA AD 2010-0131 will be cancelled and replaced (superseded) by this AD.

Commenter 2: CAA NL – Dirk-Jan de Lange – 28 October 2010

Comment # 2

The A330 freighter models are not mentioned. I don't know if this is intentional or not. EASA AD 2010-0174 applies to all A330 models.

EASA response:

The applicable ALS part 1 for the freighter models is the A330 ALS Part 1 at Revision 05. The A330 ALS Part 1 at Revision 05 is considered as part of the Freighter Type Certification Documents. Consequently, there is no need to mandate the A330 ALS Part 1 at Revision 05 for the freighter models

Commenter 3: Monarch Aircraft Engineering – Mike Foster – 29 October 2010

Comment # 3

PAD 10-112 has been issued in advance of an AD to supersede EASA AD 2010-0131. EASA AD 2010-0131 mandates A330 ALS Part 1 R4 and A340 ALS Part 1 R4. PAD 10-112 intends to mandate A330 ALS Part 1 R4 and A340 ALS Part 1 R5, however Airbus have already issued R5 of the A330 ALS Part 1. EASA should consider inclusion of A330 ALS Part 1 R5 in the release of the new AD otherwise a replacement AD will have to be issued almost immediately.

EASA response:

This AD mandates the A330 ALS part 1 at Revision 04, but the use of later approved variations or revisions of this document is acceptable for compliance with the requirements of this AD. Furthermore, The A330 ALS part 1 at Revision 05 does not introduce any restrictive maintenance requirements and/or airworthiness limitations for A330 model.

Therefore no AD supersedure is planned to mandate the A330 ALS part 1 at Revision 05.