


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-014 [Published on the 11 March 11 and officially closed for comments on the 08 April 11]

Commenter 1: Air Contractors Ltd. – Frederik Coppens – 16 March 2011

Comment # 1

"My name is Frederik Coppens and I work as Structures Engineer for Air Contractors (ACL) which operates 14 A300B4 aircraft which have been converted from passenger to freighter (from now on referred to as P2F) configuration. As it is stated in the applicability of EASA PAD 11-014, all ACL A300B4 aircraft are affected by EASA PAD 11-014.

ACL BRU Technical Services has 2 questions concerning the applicability of PAD 11-014:

- PAD 11-014 is referring to Airbus SB A300-53-0390 for instructions concerning the inspections to be performed. SB A300-53-0390 draws a distinction between passenger A/C and freighter A/C, classifying SB A300-53-0390 as mandatory for the passenger A/C but classifies it as recommended on the freighter A/C (except for MSN 083, 212 and 256). The reason Airbus provides for this is the following: "On passenger aircraft, in case of cracks being present in a crossbeam (upper and lower web), the floor grid cannot withstand ultimate load condition. On freighter aircraft this is not the case due to different load distribution via the pallets".

ACL question is: why does EASA mandates an SB which was, after the OEM performed an in-depth technical investigation, classified by Airbus as RECOMMENDED? Why is EASA not following the distinction between PAX and Freightier aircraft as Airbus made it in their Service bulletin 53-0390?

- ACL BRU Tech Services got a notification from their P2F STC-holder, stating that due to the conversion, ACL's A300B4 A/C converted by that STC holder are, since their conversion, operating in a freighter configuration. Therefore SB A300-53-0390 was classified as RECOMMENDED for these ACL A300 A/C by the P2F STC-holder.

ACL question is similar to the question above: why does EASA mandates an SB which was, after this STC-holder also performed an in-depth technical investigation, classified by an STC-holder as RECOMMENDED?

For your info, I attached to this email PAD 11-014, Airbus SB A300-53-0390 and the notification from the P2F STC-holder. Please provide your answer to all people in copy of this message."

EASA response:

Modification of a 'passenger' (PAX) aeroplane into freighter, by an STC, does not change the model designation of that aeroplane as specified on the C of A (Certificate of Airworthiness). Therefore, through this PAD, EASA mandates the quoted Service Bulletins only for PAX aircraft, as this has been justified by the OEM-Airbus.

In addition, considering the various STC designs named 'Pax to Freight conversion', or 'P2F Conversion', or else ..., EASA cannot carry on an exhaustive review of all technical solutions, and finally assess (and exclude from the AD applicability) aeroplanes which would not have to fulfil these AD requirements.

This STC review, on case by case basis, can only be done by the STC holder, and this is what the current PAD wording reflects.

Once the STC holder would have provided justifications demonstrating that the unsafe condition, which is addressed by this AD, cannot exist or develop on aeroplane modified by its design solution, or alternatively, once the STC holder would have developed appropriate instructions to accomplish actions equivalent to those required by the AD, then the STC holder will be able to request an AMOC approval (EASA Application Form 42).

Afterwards, the information delivered by Airbus, regarding the 'Recommended' classification, is not in line with the agreement between EASA and Airbus. Actions to correct this wording have been taken.

Commenter 2: Air Contractors Ltd. – Frederik Coppens – 16 March 2011
Comment # 2

"This email is in addition to the below requested actions from ACL for EASA.

As EASA wrote in PAD 11-014, "Modification of an aeroplane from passenger configuration to freighter configuration (e.g. by STC) does not exclude that aeroplane from the applicability of this AD".

All ACL A300B4 aircraft have been modified via STC from passenger to freighter aircraft (P2F conversion).

ACL is in discussion with the different STC-holders concerning the implications of PAS 11-014.

But for the time being, no alternative means of compliance for the inspections as required in PAD 11-014 are available from any of the STC-holders.

The one thing ACL knows for sure is that due to the P2F conversion, the instructions as provided in Airbus SB A300-53-0390 are not in accordance with the P2F A/C configuration. These STC-holders need time to develop their alternative means of compliance for this proposed EASA AD.

Will EASA take this in account when they determine the effective date of the final AD?"

EASA response:

As explained here above, the various design solutions are under the responsibility of their Design Approval Holder, so as their 'reactivity' to address this airworthiness issue.

The eradication of the unsafe Condition is EASA responsibility, and the reaction time that has been determined to be adequate to address the identified hazard is the Compliance Time given in the AD.

If concerned STC holder(s) cannot develop in due time Alternative Means Of Compliance, Operators have still the opportunity to request Compliance Time extension from their State of Registry.

Commenter 3: Air Contractors Ltd. – Frederik Coppens – 17 March 2011**Comment # 3**

"Thank you very much for your swift reply.

Based on the info as it is in PAD 11-014, ACL had not understood that EASA mandates the quoted SB only for PAX aircraft and converted aircraft.

ACL question: can a remark be made in the AD that EASA takes over the distinctions as it is made in the quoted SB between Passenger A/C and freighter A/C? Or that the AD is only applicable on aircraft in passenger configuration, plus the NOTE as it is already in the PAD for STC converted aircraft?

Anyhow, the below reply from EASA clears up some of ACL's doubts about PAD 11-014."

EASA response:

Noted.