


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 11-101 [Published on the 23 September 11 and officially closed for comments on the 21 October 11]</p>

Commenter 1: Brussels Airlines (BEL) – Diederik Van Cleven – 11.10.11

Comment # 1

Ref /A/: PAD 11-101

Ref /B/: BAe Systems Modification Service Bulletin SB29-048-30676A

With this message Brussels Airlines (BEL) would like to post comments on the ref /A/ PAD which has been released 23 September 2011, mandating the modification per the ref /B/ SB.

The compliance time in the PAD is 4000FH or 14 months whichever occurs first after effective date of the AD. This is in line with the compliance time per the ref /B/ SB, but there is no clarification in the SB or the PAD how this compliance time was determined.

The ref /B/ SB specifically states that it is recommended to perform this modification during a maintenance visit where the cabin interior is removed.

The ref /B/ SB also states that manhours to perform the modification is an estimate with the assumption that the cabin interior is removed (removal of cabin interior not taken into account)

The cabin interior is typically removed during a C-check, which is subject to an interval of 4000FC.

Brussels Airlines, as one of the reporting airlines of the cases of the hydraulic pipe ruptures, have been closely working together with BAe Systems during development of the modification.

As such, and with a number of aircraft already modified, the experience is that this modification will imply significant downtime when done out of a hangar visit when cabin interior is removed (e.g. C-check).

With the current compliance times proposed, most operators, including Brussels Airlines will need to have this modification performed outside C-check hangar visit.

To illustrate, BEL typically operates their RJ fleet as follows (which is a good representation of a typical European carrier using this type):

1760FC per year

2250FH per year

1.27FH per FC ratio

C-check interval of 4000FC (5080FH when using FH/FC ratio)

This means that 4000FH would mean approximately 21 months of operation. This is a difference of 7 months with the mandated calendar time limit.

BEL recognizes the unsafe condition and has been working with the manufacturer to find a solution, but also wants to emphasize the burden on operators when modifications must be done outside a major hangar visit.

Therefore, BEL would like to request the EASA whether the above information could be reviewed and possibly evaluate to:

- retain the compliance time in FH and retain the compliance time in calendar time but change from whichever occurs first to whichever occurs later

or

- retain the compliance time in FH and relax the compliance time in calendar time to better reflect aircraft utilization

or

- revise the compliance times in such a way that it suits a major hangar visit (C-check interval of 4000FC and a calculated equivalent in calendar time)

Any of the above proposed changes would have a direct positive impact on the burden to perform this modification campaign. ”

EASA response:

EASA agrees. The PCM has consulted with BAE Systems regarding the comments received and it has been agreed that a relaxation in the compliance requirements can be accepted while still addressing the unsafe condition in a reasonable period. The AD will therefore include a compliance period of 4000 FC or two years after the effective date of the AD whichever is the sooner. This means that there will have been approximately three years from the issue date of the SB to the end of the compliance period. It is expected that the majority of the aeroplane fleet would have had a C Check at 4000 FC anyway during this time and that therefore the burden on operators to incorporate the SB has been minimised.

Commenter 2: Swiss International Air Lines Ltd. – Christian Müller – 12.10.11

Comment # 2

“Ref /A/: PAD 11-101

Ref /B/: BAe Systems Modification Service Bulletin SB29-048-30676A

We (SWISS) would like to comment the actual EASA PAD 11-101 requirements.

According to the PAD we have to be complied with the AD within 14 months or 4000 FH after the effective date of the AD, whichever occurs first. As this modification requires excessive ground time and manpower (C-check or equivalent) because the cabin equipment has to be removed we would like to request EASA to review the requirements and to review the following proposals:

- retain the compliance time in FH and retain the compliance time in calendar time but change from whichever occurs first to whichever occurs later
- or
- retain the compliance time in FH and extend the compliance time in calendar time to better reflect aircraft utilization
- or
- revise the compliance times in such a way that it suits a major hangar visit (C-check interval of 5000FC and a calculated equivalent in calendar time)

If the current proposed time limitations would be kept it would cause excessive operational consequences as there would be the need to perform parts of this modification campaign outside the C-check interval. ”

EASA response:

EASA agrees. See response to Commenter 1.