

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-133 [Published on the 09 December 11 and officially closed for comments on the 06 January 12]

Commenter 1: Qantas Airways Ltd – Stuart Roach – 06.01.12

Comment # 1

"I am writing in response to the Notification of Proposal to Issue an Airworthiness Directive (PAD No: 11-133) that was issued on the 9th December 2011. I have some comments regarding the required action specified in the PAD.

Requirement 1 of the PAD indicates that the APU air intake duct is to be inspected in accordance with Airbus SB A380-49-8005 "at the next maintenance opportunity or within 18 months after the effective date of the AD, whichever occurs first". Unfortunately, the term "next maintenance opportunity" is too subjective and I do not believe operators will be able to positively demonstrate compliance with this requirement. For example, "the next maintenance opportunity" could be considered as the next time the aircraft is on the ground for longer than 1.5 hours which would require inspection during the next aircraft transit after the effective date of the AD. This could occur at a remote port and would not be achievable without causing delay. As such, I would like to request that the term "at the next maintenance opportunity" be removed from Requirement 1 and the compliance timeframe be revised to simply state "Within 18 months after the effective date of the AD..."

Requirement 2 of the PAD indicates that as of the effective date of the AD, no APU air intake duct listed in SB A380-49-8005 may be installed unless in compliance with the requirements of the AD. I believe this statement is too vague and should be revised to the following: "From the effective date of this AD, do not install on an aeroplane an APU air intake duct that has a S/N listed in SB A380-49-8005, Figure A-SBAAA - Sheet 01, unless it has been inspected and corrective actions have been taken if required in accordance with SB A380-49-8005."

I would appreciate if you could consider the above recommendations and revise the PAD accordingly (please respond to this email to advise whether the above recommendations will be adopted)?"

EASA response:

Comments agreed

Requirement 1 : AD has been updated

Requirement 2 : AD has been updated with some editorial changes

