

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-043 [Published on 22 May 2012 and officially closed for comments on 19 June 2012]

Commenter 1: Qantas Airways Ltd – Stuart Roach – 19/06/2012

Comment # 1

I currently work within A380 Fleet Engineering for Qantas Airways and would like to provide some comments on the attached PAD 12-043 regarding a proposed AD for the Crew Oxygen Cylinder Box Assembly.

I am comfortable with Requirement (1) of the PAD which requires modification of the oxygen box in accordance with Airbus SB A380-35-8007 within 18 months. However, I have a problem with Requirement (2) of the PAD which indicates that from the effective date of the AD, no oxygen box can be installed unless it is in accordance with the instructions of Airbus SB A380-35-8007. I do not believe operators can adequately demonstrate compliance with this requirement for the following reasons:

- The oxygen box is not considered as a line replaceable unit (LRU) but is considered as fixed structure. As such, the oxygen box assembly is not a tracked part and Part Number / Serial Number fitment data is not controlled by operators.
- It is not considered acceptable for operators to refer to an SB for continued instructions on how to remove/install any aircraft component/part. Continued instructions (if required) should be contained within the AMM. There are currently no removal/installation instructions within the Airbus AMM, therefore there is no documentation that can be updated to reflect Requirement (2) of the AD. Note that Qantas does not consider there to be a requirement to add removal/installation tasks to the AMM as the oxygen box assembly is not an LRU.

Based on the above, I would like to request that Requirement (2) of the PAD is removed, and compliance for the AD is controlled simply in accordance with Requirement (1).

I would appreciate any feedback, and please contact me via email if you wish to discuss further.

EASA response:

Comment understood. AD has been amended accordingly : Requirement of Paragraph (2) has been removed.