


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 13-103 [Published on 24 July 2013 and officially closed for comments on 21 August 2013]</p>

Commenter 1: Emirates – Shoaib Rehmatullah – 15/08/2013

Comment # 1

In review of the subject PAD for 'Wings – Droop Nose 1 and 2 Hinge Arm Knuckled Connection – Inspection / Replacement', Emirates Engineering would like to bring to your attention the following:

Airbus SB A380-57-8088 calls out 'Detailed Inspection (DI)' as the required inspection technique, whereas the PAD specifically calls out Detailed Visual Inspection (DVI). We understand that both acronyms/terminologies are one form of the other. However, Airbus have stated the following to our query on the same issue:

The acronym DVI or DI doesn't exist anymore and DET for detail inspection has to be used iaw MPD introduction below.

3. INSPECTION LEVELS

Various inspection levels have been considered with the aim to select the most appropriate on which is compatible to the type of damage expected. The inspection levels are:

General Visual Inspection (GVI)	<p>A visual examination of an interior or exterior area, installation or assembly to detect obvious damage, failure or irregularity. This level of inspection is made from within touching distance unless otherwise specified. A mirror may be necessary to ensure visual access to all surfaces in the inspection area.</p> <p>This level of inspection is made under normally available lighting conditions such as daylight, hangar lighting, flashlight or drop-light and may require removal or opening of access panels or doors. Stands, ladders or platforms may be required to gain proximity to the area being checked.</p>
Detailed Inspection (DET)	<p>An intensive examination of a specific structural area, system, installation or assembly to detect damage, failure or irregularity.</p> <p>Available lighting is normally supplemented with a direct source of good lighting at an intensity deemed appropriate. Inspection aids such as mirrors, magnifying lenses, etc. may be necessary. Surface cleaning and elaborate access procedures may be required.</p>
Special Detailed Inspection (SDI)	<p>An intensive examination of a specific item, installation, or assembly to detect damage, failure or irregularity. The examination is likely to make extensive use of specialized inspection techniques and/or equipment. Intricate cleaning and substantial access or disassembly procedure may be required.</p>

Emirates Engineering, therefore, requests you to please identify the correct terminology to be used for the required inspections as per the subject PAD. It is Emirates Airline's policy to ensure that all technical documents calls out exact wording as stated in the ADs.

Kindly note that Airbus has also been requested to revise the SB to state the correct acronym.

EASA response:

EASA Agreed. Final AD has been corrected to refer to DET instead of DVI.

“The acronym DVI or DI is no longer used and acronym DET for Detail Inspection has to be used in accordance with International Maintenance Review Board Policy Board (IMRBPB) decision. Please note that the Airbus SB A380-57-8088 calls out for detailed inspection (DET). A detailed inspection (DET) corresponds by definition to an intensive examination of a specific item, installation or assembly to detect damage, failure or irregularity. Available lighting is normally supplemented with a direct source of good lighting at an intensity deemed appropriate. Inspection aids such as mirrors, magnifying lenses etc. may be necessary. Surface cleaning and elaborate access procedures may be required.”

Commenter 2: Air France – Marc Terree – 21/08/2013**Comment # 2**

Following this PAD N 13-103 and SB A380-57-8088 Air France Engineering has a questions.

1. Why the SB is not mandatory while the recommendation is an AD ?
2. Why the SB asks to prevent AIRBUS in case of hinge arm defect without that we can replace this part which is referenced in the kit of the SB config 1 and config 2?
3. The SB does not clarify if kits are FOC can clarify it ?
4. Air France shall wish to have kits config. 1 and config. 2 beforehand to launch the first inspection.(To send back if not of findings).

EASA response:

- 1. Please note that the Airbus SB A380-57-8088 will be rendered mandatory when the airworthiness directive (linked to PAD13-103) will be officially published by EASA. The Proposed AD No.13-103 will be closed for consultation on 21 August 2013.**
- 2. The SB 57-8088 requests to check (measure) that there is a gap more than 0.10 mm between the bolt head and bush at the knuckle connection at each hinge arm. In case the gap is less than or equal to 0.10 mm and there is no visible damage at the inspected hinge arm, as a corrective action the replacement of the hinge arm, bush and fasteners is needed. In case the gap is less than or equal to 0.10 mm and there is visible damage at the inspected hinge arm, Airbus shall be contacted to provide a comprehensive repair solution. Therefore in such scenario, the only replacement of the hinge arm will not be an appropriate corrective action.**
- 3. Please note that the wording “kit” is not used as such in the SB, as for any part(s) that will need to be replaced, they shall be ordered as necessary through the given channel mentioned in part 2.A of the SB. With regards to the free of charge conditions please refer to paragraph 2.B of the SB where is mentioned that “AIRBUS will share the costs of accomplishment of this Service Bulletin by crediting the operator supplied AIRBUS parts for orders placed before 31st January 2016.”**
- 4. EASA recommends to contact Airbus.**