


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-121 [Published on 20 August 2013 and officially closed for comments on 17 September 2013]

Commenter 1: UPS Airlines – Mark R. Hilborn – 13.09.2013

Comment # 1

Per Reference (A), EASA has released a proposed airworthiness directive to mandate inspection of the A300 No. 2 flap beam base in accordance with Airbus SB A300-57-6005, Revision 05. The ruling was issued to incorporate revised threshold and repeat inspection interval information based on recent damage tolerance analysis (DTA) and in-service experience. The ruling adds inspection requirements for aircraft modified in accordance with Airbus SB A300-57-6006 (modification number 05815) or modified in production in accordance with Airbus modification 11133. A review of the references identified two items with the proposed ruling for which United Parcel Service (UPS) seeks clarification.

The first item relates to a conflict in the proposed rule effectivity. In the “Applicability” section, the proposed rule identifies various aircraft models with Airbus modification numbers 11133, 12047, 12048, 12050 and 12699 as being exempt from the ruling requirements. However, in Appendix 1, Table 2, a compliance time for aircraft with modification 11133 embodied is listed. Based on the supporting data, UPS believes that the ruling intent is to inspect aircraft that have been modified in accordance with Airbus modification number 05815 (in-service per SB A300-57-6006) or 11133 (production modification). Based on this understanding, UPS proposes to change the “Applicability” section to read as follows: “Airbus A300 aeroplanes, all certified models, all manufacturer serial numbers (MSN).” UPS believes this proposed wording accomplishes the intent for the proposed ruling effectivity.

The second item deals with the inspection procedure identified for the No. 2 flap beam. In the “Required Actions and Compliance Times” section of the rule, Airbus service bulletin A300-57-6045, Revision 05 is identified as the inspection instruction method to be used to comply with this ruling. A review of the Airbus service bulletin notes that aircraft which had modification number 11133 embodied in production are not listed in the service bulletin effectivity. It is not clear to UPS if the procedure can be used without being identified in the service bulletin effectivity or if the regulatory ruling effectivity provides approval to use the inspection procedure to establish compliance with the mandated ruling. Therefore, UPS requests further clarification if the Airbus SB A300-57-6045 procedure is approved for use on aircraft embodied with modification 11133 or if a separate or different inspection procedure is to be used to establish compliance with this ruling.

EASA response:

UPS’ questions come from a misunderstanding of the AD applicability. In order to clarify the intent of the wording, the applicability was amended to read:

“...all MSNs, except: - A300F4-622R aeroplanes with all of the following Airbus modifications embodied: Mod. 11133, 12047, 12048 and 12050
 - A300F4-605R and A300F4-622R aeroplanes with both Airbus Mod. 11133 and 12699 embodied.”

Aircraft with only Mod. 11133 embodied are part of the applicability of this AD.

Clarifying the wording and intent of the applicability also responds to the second point raised by the commenter. Aeroplanes in post-MOD 11133 configuration are listed in the Airbus service bulletin A300-57-6005, Revision 05 (and not -6045 as noted by the commenter).