


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;"><b>EASA PAD No. 13-144R1</b>  <b>[Published on 18 December 2013 and officially closed for comments on 01 January 2014]</b></p>

**Commenter 1: Cathay Pacific Airways Limited – Orlando Nisperos Jr. – 20.12.2013**

**Comment # 1**

Due to known reliability issues of the T700 C-Ducts, we are having an average of 22 C-Duct removals a year in our fleet and it can be done even in outstations. Effectively, what the PAD says is that upon the effective date of the AD, you cannot install a C-Duct into an aircraft unless Post SB A330-78-3021 hinge sleeves are installed back together with the C-Duct.

**Problem in Controlling Post-Mod Hinge Sleeve Installation during Unscheduled Removals.** It will be difficult to control hinge sleeves replacements each time we replaced a C-Duct. For unscheduled removals, we haven't have a fool proof means to notify Line Personnel that if they need to replace a C-Duct they need to make sure they install it with Post-mod hinge sleeve as per the AD. This requirement is prone to non-compliance on unscheduled removal cases at least for the first 12 months of the AD effectivity.

Our suggestion is for Airbus to revise the AMM to reflect the requirement of making sure that only Post SB A330-78-3021 hinge sleeves are installed into the aircraft when installing C-Ducts. This will ensure that mechanics are aware of the AD requirements even in the case of unscheduled removal. Then Item 3 of the "Required Action(s) and Compliance Time(s)" of the PAD can be deleted.

Please consider the above suggestion in issuing the AD. Thanks.

**EASA response:**

***Comment not agreed. Today, the corrective action of this unsafe condition is only covered by Airbus SB A330-78-3021. In addition, according to EASA procedures any mandatory corrective action must be approved by EASA and the AMM is not part of the approved documents. It is the operator responsibility to take the necessary actions to comply with the requirements of this AD. No changes have been made to the Final AD in response to this comment.***

**Commenter 2: SIA Engineering Company Ltd. – Jimmy Aw – 32.12.12**

**Comment # 2**

PAD 13-144R1 stipulates to "... replace the hinge sleeves N°3 and N°4 of the TRU cowl door in accordance with the instructions of Airbus Service Bulletin (SB) A330-

78-3021 Revision 01".

A330-78-3021 Revision 01 has the following note:

NOTE: Refer to ROLLS ROYCE Service Bulletin No. RB.211-78-AG924 for the making of the modification.

(a) Replace the Sleeves of Hinge #3 and #4

refer to ROLLS ROYCE Service Bulletin No. RB.211-78-AG924

refer to [Fig. A-FBAAA Sheet 03](#)

1 Remove:

4	Sleeve	91H364-01	Item (37)	Discard
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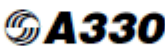
NOTE: The sleeves 91H364-01 are components of the kit 91A444-04.

2 Install:

4	Sleeve	91H364-02	Item 37
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NOTE: The sleeves 91H364-02 are components of the kit 91A444-05.

NOTE: Refer to ROLLS ROYCE Service Bulletin No. RB.211-78-AG924 for the marking of the modification.

1	Outer body	Item (19)
	from the lock washers 23.	
	<u>NOTE:</u>	Item (25) is part of tool HU87131-1 (Lock Washer installation).
	<u>NOTE:</u>	Items (35), (36), (38), (39) and (40) are parts of tool HU87128
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 <b>A330</b> SERVICE BULLETIN		
		(Pin installation).
	<u>NOTE:</u>	Refer to ROLLS ROYCE Service Bulletin No. RB.211-78-AG924 for the making of the modification.

## Comment:

1. Is the operator in compliance with the AD without carrying out the marking of the modification (typo error in page 29 of SB)?
2. If marking of the modification is required, I note that RB.211-78-AG924 does not have the marking procedure.
3. If marking of the modification is required, I note that RB.211-78-AG924 does not reference Aircell SB 78-AG924 for the marking procedure.

**EASA response:**

**Answer to comment 1: The marking of the modification is part of VSB ROLLS ROYCE No. RB.211-78-AG924 instructions. This VSB is covered by Design Approval Holder Airbus SB A330-78-3021. Final AD will mandate this cover Airbus SB A330-78-3021 because the unsafe condition is at aircraft level. Consequently, the marking of the modification is part of AD requirements. Non embodiment of marking of the modification is considered as non-compliance with AD requirements. The typo error in page 29 of SB will be corrected at the next SB revision opportunity. No changes have been made to the Final AD in response to this comment.**

**Answer to comment 2: As noticed, the marking procedure is not part of VSB ROLLS ROYCE No. RB.211-78-AG924 but part of Safran Aircelle SB 78-AG924. Operators must consider the both VSBs as a unique document because Safran Aircelle SB 78-AG924 has been approved as part of the ROLLS ROYCE SB No. RB.211-78-AG924. No changes have been made to the Final AD in response to this comment.**

***Answer to comment 3: It is true that RB.211-78-AG924 does not reference Safran Aircelle SB 78-AG924, as regards the marking of the modification is concerned, however Operators should consider the two VBSs as a unique document. No changes have been made to the Final AD in response to this comment.***