


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 13-154</b> <b>[Published on 04 October 2013 and officially closed for comments on 01 November 2013]</b>

**Commenter 1: HI FLY – Rui Cavaco– 04.10.2013**

**Comment # 1**

Do you confirm that VSB ERPS33T-29-6 (not included by reference on PAD, covered by SB A340-29-5021) must be accomplished on RAT MODULE in workshop environment only?

**EASA response:**

*Comment understood. It is confirmed that the required actions are to be accomplished in a workshop environment. This AD requires modification of the aeroplane to be accomplished in accordance with the instructions of Airbus SB A340-29-5021, per paragraph 3 Accomplishment instructions, C procedure, (1) Subtask 295021-020-202-001 - Remove the RAT, (a) Remove the RAT Module (Refer to AMM Task 29-24-52-000-801).(2) Subtask 295021-831-202-001 - Modify the RAT module (Vendor). The RAT (Module) should be provided to the vendor for modification (P/N change), which would allow re-installation of that Module on an aeroplane.*

**Commenter 2: Cathay Pacific Airways Limited – Conor Doherty – 01.11.2013**

AIBHKG,

Reference PAD 13-154, and its related Service Bulletins A330-29-3122 / A340-29-4093, I would like to express my concern in relation to Airbus' use of multiple Vendor Service Bulletins for the control and implementation of EASA mandated actions, as well as highlight some issues in relation to the mandating of work instructions that are already previously mandated.

Airbus has relinquished a large amount of control to vendor documents rather than Airbus Service Bulletin level documents [evident from several AD revisions due to vendor document revisions], which puts operators in the difficult circumstance of trying to demonstrate compliance to their authority for the large number of compliance requirements that are mandated by EASA, coupled with multiple secondary requirements from several documents.

Current mandated running programmes on Ram Air Turbines:

EASA AD 2011-0197 – RAT Hydraulic Pump Anti Stall Valve Inspection

- No part number roll on any component.

- Hydraulic Pump becomes Amendment “C”

EASA AD 2011-0204R1 – RAT Actuator Inspection and Replacement

- Potential Actuator Change
- RAT P/N Roll: 1702934A rolls to 1702934B
- All other RAT P/Ns remain the same
- All RATs have mod status change [Mod 18]

The new PAD, PAD 13-154 will now [re]mandate the following requirements:

VSB ERPS06G-29-6 [Balance Weights and Washers] – Reference EASA AD 2009-0260 [Already complied]

- No part number roll on any component

VSB ERPS06M-29-13 [Liebherr Actuator Coil Spring] – No previous EASA mandated actions

- RAT modification status change [Mod 13]
- Part number roll on actuator from 5911326 / 5911905 to 5913233 / 2913234

VSB ERPS06M-29-18 [Arkwin Actuator Replacements] – Reference EASA AD 2011-0204R1

- Requirements as previously stated

VSB 5909522-29-1 [Parker Pump Anti-Stall Valve Check] – Reference EASA AD 2011-0197

- Requirements as previously stated

VSB ERPS06M-29-19 [Hydraulic Pump Check]

- Part number roll on all inspected RAT assemblies and Hydraulic Pump.

Through PAD 13-154 EASA will now mandate certain actions a second time, even though operators are still carrying out some of these mandated actions under other ADs. i.e. a situation would exist where unscheduled replacement of components can occur, upsetting already delicate spares provisioning arrangements.

CPA request that;

- Airbus / EASA consider controlling this and any future mandated actions through Airbus Service Bulletin level documents only and not through vendor controlled documents thereby eliminating multiple compliance requirement sources.
- Airbus / EASA consider removing non-mandatory concurrent requirements [VSB ERPS06M-29-13] from this PAD, as this non-mandatory requirement is not part of or even referenced in the AD level document.

#### ***EASA response:***

***Comment partially agreed. You find hereafter some clarifications related to each point.***

***Your comment: “EASA AD 2011-0197 – RAT Hydraulic Pump Anti Stall Valve Inspection***

- ***No part number roll on any component.***
- ***Hydraulic Pump becomes Amendment “C”***

***EASA response to this point: This AD was effective on 24 October 2011, taking into account Table 1 of this AD (which includes the compliance time), the required actions must have been accomplished by 24 October 2013, and therefore all operators must be today in compliance with requirements of this AD.***

*In addition, EASA confirm that there was no change of part number associated to this AD, only an amendment of hydraulic pump marked with an "X" or a date (month/year) in the amendment cell C of the identification plate.*

*Your comment: "EASA AD 2011-0204R1 – RAT Actuator Inspection and Replacement*

- Potential Actuator Change*
- RAT P/N Roll: 1702934A rolls to 1702934B*
- All other RAT P/Ns remain the same*
- All RATs have mod status change [Mod 18]"*

*EASA response to this point: This AD was effective 28 October 2011 , taking into account the compliance time, the latest date for accomplishing the required actions is 28 October 2014 – Certain aeroplanes could potentially be not yet in compliance with the requirements of that AD. The AD text has been updated to specify that an aeroplane on which the actions required by this new AD are accomplished, remains in compliance with the requirements of EASA AD 2011-0204R1.*

*General EASA response: This AD mandates accomplishment of AIRBUS SB A330-29-3122 / SB A340-29-4093 as applicable. Those SBs incorporate a reference to HAMILTON SUNDSTRAND Service Bulletin ERPS06M-29-19.*

*Those AIRBUS SB A330-29-3122 / SB A340-29-4093 also require to accomplish "concurrent requirements", if applicable. Accomplishment of these Service Bulletin require the prior or simultaneous accomplishment of concurrent Service Bulletin(s) or the equivalent production modification(s).*

*However, if the actions are already accomplished and that can be conclusively demonstrated through approved maintenance records, there would be no need to accomplish them again.*

*With the modification plan (AIRBUS SB A330-29-3122 / SB A340-29-4093), it will be ensured that only a RAT at the latest standard configuration is installed on an aeroplane.*