


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 13-156</p> <p>[Published on 07 October 2013 and officially closed for comments on 04 November 2013]</p>

Commenter 1: Meraj Airlines – Nima Amini – 21.10.2013

Comment # 1

1. According to the critical areas, Validation of airworthy of A/C and regarding to past events, there are not any airworthiness directives below this time so it have not been accomplishment Ultrasonic Inspection Test in some kind of Airlines around the world, we recommend compliance time of this Pad should be decreased from 36 months to at least 20 months.
2. According to paragraph 3 of this Pad, we suggest your group should recognize the areas which have been had the most of reports due to cracks observed and determine the interval Inspections for those zones.

EASA response:

1. EASA disagrees with the comment.

The compliance time for this AD is based on in-service experience and full scale fatigue test results.

The findings in-service were made during the normal scheduled inspections. If severe findings would have been reported, the compliance time might have been reduced by the manufacturer in agreement with the airworthiness authority.

There is no known severe reporting of findings at Airbus neither from the commenter or from other operators for this area.

2. EASA disagrees with the comment.

It is standard practice that the EASA AD refers to the TC Holder Service Bulletin for the details of corrective measurements to be taken in relation to the conditions described in the AD.

Commenter 2: BCS (European Air Transport Leipzig GmbH) – Jan Wouterse – 28.11.2013

Comment # 2

BCS (European Air Transport Leipzig GmbH) is the operator of 19 A300-622R converted freighters and responsible Part M Engineering provider for a total of 21 A300-622R converted freighters. All aircraft were converted to freighters in the time frame between September 2011 and July 2013. Most aircraft were also inspected at the fwd pax door surround structure iaw. Airbus MPD task 531217-02-1 (DGAC AD F-1991-132-124-A) with findings on several aircraft. Findings were either within the allowable damage limits iaw. current SRM revisions or were covered with separate RDAS by Airbus.

We understand that Airbus SB A300-53-6173 is being rendered mandatory to ensure compliance with reduced SRM allowable damage introduced as part of ongoing damage tolerance investigations in the A300-600 SRM revision in 2008. BCS understand the intention of the rule-making efforts under PAD 13-156 and agree that compliance with current and reduced SRM allowable limits must be assured.

Unfortunately, SB A300-53-6173 requires a full one-time inspection of the door surround structure without establishing any credit for previous inspections and existing documented damage covered by SRM revisions post 2008 or RDAS issued after a certain cut-off date.

EASA is kindly asked to investigate the possibility of giving credit for previous work which was documented as part of scheduled maintenance work. The approach of a full reinspection penalizes operators which have already assessed reworks as per the currently approved data and maintain clear documentation of the accomplishment of those inspections.

EASA response:

EASA agrees with the comment. PAD 13-156R1 is issued to require inspection in accordance with the instructions of Airbus SB A300-53-6173 at Revision 01, which gives credit for work accomplished previously.