

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-162 [Published on 04 November 2013 and officially closed for comments on 02 December 2013]

Commenter 1: Virgin Atlantic Airways Ltd – Conrad Lowen – 02/12/2013

Comment # 1

I would like to raise the following for consultation on PAD 13-162.

Regarding the Required Action and Compliance Time: - The PAD states 'Unless accomplished previously No later than 30 April 2015, modify the affected fire extinguishing pipe between FR34 and FR36 in the forward LDCC in accordance with the instructions of AIRBUS SB A330-26-3053.

Original Publication reference is for AIRBUS SB A330-26-3053 Original Issue dated 20 June 2013.

According to the SB A330-26-3053 Section E. Compliance item (2) the modification must be embodied within 26 months from the date of issue of this Service Bulletin.

VAA calculate the 'No later' date according with the Service Bulletin to be August 2015.

VAA would like the proposed AD timescale to reflect the AIRBUS Service Bulletin compliance time of 26 months.

EASA response:

EASA disagrees. It is clearly mentioned in Airbus SB A330-26-3053 §1.E.(2) that: "It is anticipated that the AD will confirm the (thresholds and/or intervals and/or date) given above but reference should be made to the AD for confirmation of the mandated accomplishment timescale." When developing this AD, the EASA safety assessment determined that the affected fire extinguishing pipe should be modified no later than 30 April 2015,

It has been determined that the modification as required by this AD must be accomplished within the compliance time specified in the AD (i.e. no later than 30 April 2015). No changes have been made to the Final AD in response to this comment.