


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 13-180</b> <b>[Published on 04 December 2013 and officially closed for comments on 01 January 2014]</b>

**Commenter 1: Air Transat A.T. inc. – Ianik Guy-Michaud – 05.12.2013**

**Comment # 1**

PAD 13-180 introduces a significant threshold reduction (from 13,500 FC down to 9600 FC/62600 FH for our fleet). Considering the major work involved (vertical stabilizer removal, 190 man-hours per Airbus estimation) we suggest to allow the same grace period than SB A330-53-3160 R03 (20 months instead of 12 months). PAD Part B, Table 3, section F should read:

Within 20 months after the effective date of this AD, but without exceeding the previous threshold as defined in SB A330-53-3160 Revision 02, since aeroplane first flight.

The actual 12 months grace period is not sufficient to reach the next scheduled C checks, e.g. a special heavy maintenance visit would be required only for this modification. The impact on our operation would be major.

**EASA response:**

**Comment understood, but not agreed. Airbus SB A330-53-3160 revision 03 was issued in January 2012, long before the issuance of this PAD, therefore operators are considered to have had sufficient time to plan the corrective actions. No changes have been made to the Final AD in response to this comment.**

**Commenter 2: Deutsche Lufthansa AG – Brigitte Gilles – 05.12.2013**

**Comment # 2**

Para 5 of this PAD stated that an accomplishment of a repair as rectification of a crack finding is not considered as terminating action for the inspection requirement.

“(5) Accomplishment of a repair as required by paragraph (3) or (4) of this AD, as applicable, does not constitute terminating action for the repetitive HFEC inspections as required by paragraph (1) or (2) of this AD, as applicable.”

We assume that a repair of a crack with length of 10 mm or more will end up in an reinforcement by a doubler or extended fitting or something else in the affected area and that in such a case may the original skin can't be inspected by the given HFEC inspection as mentioned in SB A330-53-3068. You may have to switch to another inspection method like x-ray, rototest or ultrasonic inspection for the area where the repair will be carried out. Therefore the statement that the accomplishment of a

repair is not a terminating action seems to be valid only for the area where no repair will be carried out. For the repaired area new inspections will be covered by adequate Repair Design Approval Sheets RDAS, which is out of the scope of the SB.

Airbus & EASA are kindly asked to review the wording for paragraph 5 and to update if needed.

***EASA response:***

***Comments agreed. The Final AD has been amended accordingly.***