

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-048 [Published on 7 March 2014 and officially closed for comments on 4 April 2014]

Commenter 1: FedEx Express – Bob Miskimen – 11.03.2014

Comment # 1

FedEx Operates 71 A300 Aircraft affected by the subject PAD. We have operated these for more than a sixteen years. Our maintenance records has not identified one of the “Struts” subject to inspection as requiring maintenance or replacement. FedEx Express has not purchased any of these parts in the history of our fleet. The oldest aircraft in our fleet has over 37,000 Flight Cycles and even greater Flight Hours with no indications of trouble during routine zonal inspection performed every 2.5 years.

Now Operators are required to look for obscure cracking as a result of manufacturing deficiency and pay for a temporary measure.

Based on the following points, FedEx will not consider this proposal to be adequate:

- The Final Solution is due by the end of year 2014 according to TFU 53.19.89.001. FedEx Recommends waiting for a solution.
- Airlines are expected to bear the burden of this inspection/fix while waiting for terminating action.
- The Temporary Fix (SB A300-53-6172) Cost are USD\$2100, 2 MH Labor for installation, 6 MH for inspection (per aircraft).
- This excludes approximately 16 MH re-inspection (SB A300-53-6174), repetitively, every 24 Months.
- The expected costs of initial / repetitive inspections, plus modification, exceeds USD\$225,000 for 3 Years on FedEx alone.
- The Temporary Clamp Fix, Sealant, & Moisture Displacing compound must be removed for repetitive HFEC inspection.

Operators are requesting a planned final solution, with Airbus participation in cost sharing. The interim fix is not cost effective and provides no benefit to the structure and may cause additional damage.

EASA response:

EASA disagrees with the comment. The arguments of costs should not overrule the safety issue. FedEx are reminded of the possibility to apply for an AMOC to the AD where a proposal with the same level of safety can be presented.

Commenter 2: Lufthansa Technik – John Donegan – 14.03.2014

Comment # 2

Please find attached comments related to PAD 14-048 from Lufthansa Technik on behalf of German Air Force:

- Requirement (1) of the PAD states “Within the threshold defined in Table 1...accomplish a High Frequency Eddy Current (HFEC) inspection...in accordance with Airbus SB...”.

Please note that for aircraft without modification 06101 embodied, a HFEC inspection is not required by the SB. A one-off visual inspection is required on those aircraft to verify that the original part (number) is still installed, to ensure that they remain unaffected by the safety concern of cracking. If a part number not susceptible to cracking is found installed (i.e. not the R- numbers listed in the SB), no further action is required. We request that the AD be more specific to enable operators to identify which parts are of concern.

1. LHT requests to add a requirement (before the PAD requirement Para. 1) to add a single inspection to identify the PN installed on all aircraft up to MSN 0878 (not just up to pre MSN 499 as given in the SB) to determine if an affected strut is installed in the first place. If the operator has complete maintenance records, a documentation check should be sufficient to check this. Otherwise a physical inspection on the aircraft is required. This will ensure each aircraft configuration is clear, whether it has an affected part installed or not – this should not be determined purely on an MSN basis as these parts could have been replaced with either pre- or post-06101 parts on any aircraft up to 0878.
 2. LHT requests to then specify the requirements for HFEC inspection as currently given in Table 1, adding the very important limitation based on the current aircraft configuration at part number level (R21449, R21449D, R21449G or R21449H), not the modification status at delivery from Airbus. The safety concern is limited to specific part numbers and we therefore request that this is clearly considered in the text of the AD, for all MSNs. The inspection should be mandated for all aircraft with those affected part numbers, regardless of the MSN. LHT notes that all MSNs are listed in Table 1 (assuming they have the R-part number). However, equally any MSN should be excluded if it has a pre-modification (A53...) part installed, regardless of MSN; the SB currently gives this option only for aircraft up to MSN 499. This should be extended to any aircraft up to MSN 0878). As it cannot be assumed that pre-modification 06101 aircraft did not have a post 06101 installed since EIS (hence the need to verify PN), the operators of aircraft MSN 499 and after may have installed “old” parts in service (not R-number) and those aircraft equally need to be removed from the applicability.
- Requirement (2) of the PAD states “identify affected struts” concerning the modification; it makes clear that the modification (clamp installation) is not required on any specific MSNs, but on all aircraft with those with affected struts installed, irrespective of MSN. LHT agrees with the wording of this paragraph in the PAD.
 - It may be necessary to mandate operators to install the clamps and carry out the HFEC inspections every 24 months with any installation of a “R-“ PN strut in place of a pre 06101 strut (thus far not subject to the safety concern), from the effective date of the AD. This will ensure that should a safety-critical rod become installed on an aircraft previously not affected, then the issue will be addressed.

LHT would like to re-iterate that the current wording of the PAD mandates the inspections for all aircraft, irrespective of which rod part number is installed. In the SB, Airbus has limited the applicability to certain part numbers. It should be up to the operator to monitor this. The wording related to the modification is clearer that it is required only on “affected struts” as given in the SBs. As Airbus has limited the applicability based on technical analysis and also on specific service damage reports, we request that this applicability to part numbers is clearly reflected in any AD and not to burden operators which do not have a safety issue by mandating a modification and inspection globally on all aircraft.

EASA response:

EASA disagrees with the comment: The SBs A300-53-0395, A300-53-6174, A300-53-9024 and A310-53-2137 respectively give the specific details on the parts to be inspected. Because EASA has to assume that there are operators with no complete maintenance records, it is not an option to let operators do a documentation check only, instead of an inspection. It is necessary to have a representative fleet survey on that safety issue.

Commenter 3: UPS Airlines – Mark R. Hilborn – 26.03.2014**Comment # 3**

Per Reference (A), EASA has released a proposed airworthiness directive to issue a new airworthiness directive to establish repetitive eddy current inspections of the fuselage frame FR91 support struts. In addition to the inspection, if not previously accomplished, reinforcing clamps are to be installed on the support strut ends per Reference (B). The inspection is recommended within 12 to 24 months after the ruling effective date based on the aircraft manufacturers serial number (MSN). United Parcel Service Co. (UPS) has the following comments regarding the proposed ruling parameters.

The first comment is in regards to the inspection threshold being dependent on the aircraft serial number. Service history has recorded over 500 inspections with minimal damage findings or support strut replacement. The reported findings have been on high time aircraft with in-service times in excess of 30,000 total flight hours. Per EASA AD 2014-0068, the same mandated support strut inspection for the A330 / A340 aircraft family has an initial threshold of up to 36 months with repeat intervals of 42 months or 20,000 flight hours. Based on the worldwide service experience, UPS proposes changing the inspection threshold as follows:

- For A300 / A310 aircraft with 30,000 or more total flight hours, inspect within 2,000 flight hours or 30 months, whichever occurs first, after the ruling effective date.
- For A300 / A310 aircraft with 20,000 to 29,999 total flight hours, inspect within 3,000 flight hours or 30 months, whichever occurs first, after the ruling effective date.
- For A300 / A310 aircraft with less than 20,000 total flight hours, inspect prior to the accumulation of 20,000 total flight hours or within 4,000 flight hours, whichever occurs later, or within 30 months after the ruling effective date, whichever occurs first.

Our final comment concerns the repetitive inspection interval. Based on the current worldwide fleet experience, proposes a repeat inspection interval similar to the requirement established for the A330 / A340 aircraft family. Using the same principles used in the A330 / A340 AD rule, UPS proposes to revise PAD 14-048, paragraph (1) as follows:

(1) Within the threshold defined in Table 1 of this AD, as applicable, and, thereafter, at intervals not to exceed 3 a months or 15, 000 flight hours, whichever occurs first, accomplish a High Frequency Eddy Current (HFEC) ...

UPS acknowledges the need for the FR91 support strut inspection detailed in Airbus SB A300-53-6174. Based on the 1,800 plus A300 / A310 / A330 / A340 aircraft service experience and inspection findings to date, UPS believes the proposed changes ensure the continued safe operation of the worldwide Airbus widebody and long range fleets by providing an equivalent level of safety to the proposed rule.

EASA response:

For the first comment, EASA disagrees. EASA would like to emphasise the difference in the fleet usage and age between the A330/A340 and the A300/A310 fleet. The A300/A310 fleet is in general older than the A330/A340 fleet and there have been severe findings on the struts. The A300/A310 fleet utility is also subject to more cycles per flight hour compared to the A330/A340. Taking this into account, EASA found the 12, 18 and 24 months fulfilling the safety objectives in this AD.

For the second comment EASA disagrees. The repeat interval is determined using the same rationale as for the threshold inspection.