

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-058 [Published on 25 March 2014 and officially closed for comments on 22 April 2014]

Commenter 1: Deutsche Lufthansa AG – Brigitte Gilles – 08.04.2014

Comment # 1

Regarding the PAD 14-058, which was published March, the 25th 2014, Lufthansa have some comments to the upcoming AD.

PAD Paragraph (1):

In Table 2 Airbus SB A340-57-4125 Revision 01 is mentioned. We assume that this is a typo, a revision of that SB is not yet published. SB A340-57-4124 should be in Revision 01 instead. This information is missing in Table 2.

PAD Paragraph (3):

The meaning of the sentence in the brackets of that paragraph is unclear. Is it the intention that corrective actions have to be accomplished as per applicable SB but if cracks still exists, Airbus has to be contacted to get further approved repair instructions? In that case, will the need and definition of a subsequent/additional repetitive inspections (if any) for that specific repaired area be defined in Airbus RDAS? Does a repair as per approved repair instructions and the definition of repeat inspections as per RDAS terminates the repeat inspection requirement of paragraph (1) for the specific repaired area?

PAD Paragraph (5):

After accomplishment of corrective actions and if an Airbus RDAS is required to cover the repair, the repeat inspection requirement of paragraph (1) should be terminated for the specific repaired area. Subsequent repetitive inspections should be defined in the Airbus RDAS (if any).

PAD Paragraph (6):

Airbus and EASA may have to reconsider this wording. The current text allows a termination of ALI task 57-11-04 and 57-11-02 only after the relevant SB's were carried out.

In our understand the ALI task is no longer applicable and superseded by the SBs and this should be reflected in the PAD/AD.

A better wording could be: "Inspection program defined per SB A330-57-3114, SB A330-57-3115 and SB A330-57-3116 for A330, or SB A340-57-4123, SB A340-57-4124 and SB A340-57-4125 for A340 supersedes ALI task 57-11-04 and 57-11-02."

PAD Paragraph (7):

Inspections and corrective actions, as well as the installation of new transition fit fasteners as per paragraph (2) accomplished before the effective date of the AD in accordance with the mentioned documents should be acceptable to comply with the AD requirements.

EASA response:

PAD Paragraph (1):

It is correct that Airbus SB A340-57-4125 Revision 01 does not exist. It is also confirmed that Airbus SB A340-57-4124 exists at Original issue or Revision 01. Table 2 of the final AD has been amended accordingly.

PAD Paragraph (3):

It is correct that an Airbus RDAS may constitute terminating action for the repetitive inspection as required by this AD, for the repaired area. In that case, the Airbus RDAS must contain instructions for subsequent post-repair repetitive inspections (if any) for that specific repaired area. The AD has been amended in response to this comment, to be consistent with the above practice.

PAD Paragraph (5):

See EASA answer to your comment to paragraph (3).

PAD Paragraph (6):

Comment not agreed. No changes have been made to the Final AD in response to this comment.

PAD Paragraph (7):

Comment partially agreed. Paragraph (7) has been amended accordingly, also to emphasize that new fasteners must be installed at each inspection.

Commenter 2: SR Technics Switzerland – Philippe Rossier – 11.04.2014

Comment # 2

Required Actions and compliance times

Paragraph (2)... install new fasteners in **transition fit** and not “transit fit”

EASA response:

Comment agreed. Final AD has been amended in response to this comment.

Commenter 3: Lufthansa Technik AG – Andreas Halske – 15.04.2014

Comment # 3

PAD Paragraph (1):

In Table 2 Airbus SB A340-57-4125 Revision 01 is mentioned. I assume that this is a typo, a revision of that SB is not yet published. SB A340-57-4124 should be in Revision 01 instead. This information is missing in Table 2.

PAD Paragraph (3):

We discussed but the meaning of the sentence in the brackets of that paragraph remain unclear. Is it the intention that corrective actions have to be accomplished as

per applicable SB but if cracks still exists, Airbus has to be contacted to get further approved repair instructions? In that case, will the need and definition of a subsequent/additional repetitive inspections (if any) for that specific repaired area be defined in Airbus RDAS? Does a repair as per approved repair instructions and the definition of repeat inspections as per RDAS terminates the repeat inspection requirement of paragraph (1) for the specific repaired area?

PAD Paragraph (5):

After accomplishment of corrective actions and if an Airbus RDAS is required to cover the repair, the repeat inspection requirement of paragraph (1) should be terminated for the specific repaired area. Subsequent repetitive inspections should be defined in the Airbus RDAS (if any).

PAD Paragraph (6):

“Accomplishment of the initial and repetitive inspections as required by this AD cancels the need to accomplish Airworthiness Limitation Items tasks 57-11-04 and 57-11-02.”

Airbus and EASA have to reconsider this wording. The current text allows a termination of ALI task 57-11-04 and 57-11-02 only after the relevant SB's were carried out. In our understand the ALI task is no longer applicable and superseded by the SBs and this should be reflected in the PAD/AD-Note.

A better wording could be: “Inspection program defined per SB A330-57-3114, SB A330-57-3115 and SB A330-57-3116 for A330, or SB A340-57-4123, SB A340-57-4124 and SB A340-57-4125 for A340 supersedes ALI task 57-11-04 and 57-11-02.”

PAD Paragraph (7):

Inspections and corrective actions, as well as the installation of new transition fit fasteners as per paragraph (2) accomplished before the effective date of the AD in accordance with the mentioned documents should be acceptable to comply with the AD requirements.

EASA response:

See EASA answers to Comment # 1.

Commenter 4: Virgin Atlantic Airways – Jim Guneratnam – 09.04.2014

Comment # 4

Virgin Atlantic Airways (VAA) would like to bring to your attention suspected errors noted in Revision Level Data associated with two Service Bulletin listed in Table 2 of Reference /A/ PAD.

References /B/ and /C/ reflect the current Revision Levels of two SB as found in the TCH database for Service Bulletins

In Table 2 of Reference /A/ PAD, Revision Level data appear to be at variance with current SB Data issued by TCH and as reflected in References /B/ and /C/. Specifically:

- (a) SB data in Row 4, Column 2, of Table 2 of Reference /A/ shows a non-existent Revision Level to SB A340-57-4125
- (b) SB data in Row 6, Column 2, of Table 2 of Reference /A/ shows a superseded Revision Level to SB A340-57-4124

EASA ACTION

Request that the Revision Level data variances noted in Reference /A/ PAD be investigated

EASA response:

See EASA answers to Comment # 1.