

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-080 [Published on 20 May 2014 and officially closed for comments on 17 June 2014]

Commenter 1: American Airlines – Vincent Adam – 23/05/2014

Just a minor comment on the PAD 14-080 THSA Modification:

- Paragraph (3) implies that all groups/configurations require rework per A330-92-3046 Rev 6, but this is not the case. For instance, USA is Configuration 5 and we accomplished A330-92-3046 rev 5, and require no rework.
- I recommend clarifying the requirement of paragraph (3) to match the rework requirements of the SB.

EASA response:

Comment agreed.

Paragraph (3) of the final AD has been amended considering the aeroplane configuration as specified in the applicable Airbus SBs.

Commenter 2: Lufthansa – Brigitte Gilles – 04/06/2014

Regarding the PAD 14-080, which was published May, the 20th 2014, Lufthansa has a comment to the upcoming AD.

In the beginning of PAD Paragraph “Required Action(s) and Compliance Time(s)” 3 groups are defined. In the groups airplanes A340-600, which are retrofitted by SB A340-27-5030 and A340-92-5008 are missing. Please add this configuration in the table.

EASA response:

Comment understood.

As a first point, please note that for the purpose of this (P)AD, and as specified by you below, groups of aeroplanes were defined but, in this specific case, groups are defined and used for excluding some aeroplanes for accomplishing certain actions, and not for defining an AD Applicability.

As a second point, please also note that the Airbus SBs, that are mentioned in your mail, are the ones that are required to be accomplished for compliance with this (P)AD. If those SBs are already accomplished, this is already enough to be in compliance with the requirements of this (P)AD. This is confirmed by the 1st sentence of the “Required Action(s) and Compliance Time(s):”, that is “Required as indicated, unless accomplished previously”.

No changes have been made to the Final AD in response to this comment.

Commenter 3: Air France – Bertrand Bolot – 13/06/2014**COMMENT 1**

Paragraph (1.2) of PAD N°14-080 refers to ALS part 4 for THSA ball-nut lubrication: 1000FH interval is required for THSA PN: 47147-500/-700, 47172-300/-500/-510/-520/-530.

AMOC 10037781 and AMOC 10037783 mandates that : threshold and repetitive interval at 700FH for lubrication of the THSA must be kept if modification of THSA CSP and/or additional electrical harness is pre mod: It can be confusing for operators to note in ALS part 4 that THSA greasing at 1000FH is valid for any kind of THSA standard (without any condition) and on the other hand to have AMOC referring to a THSA greasing at every 700FH or every 1000FH depending on THSA standard and electrical harness configuration (see below).

AFR would like AD clarification regarding application condition of THSA greasing at 1000FH by mentioning either

- THSA greasing procedure at 1000FH is valid without any condition

or

- THSA greasing procedure at 1000FH is valid only with conditions stated above.

COMMENT 2

- Regarding part "Reason" of PAD which states history of transfer tube disconnection, AMOC 10037781 and AMOC 10037783 should also be added.

COMMENT 3

In paragraph 2) it is mandated to embody latest SB revision not later than 31 decembre 2016:

Paragraph 3 and paragraph 4) can cause confusion because it calls for application of SBs revision given in table 1 of paragraph 2) or table 2 of paragraph 4).

- In order to render this PAD comprehensible, table 1 and 2 should be included in paragraph 2) and note should be added to require additional work for aeroplane already modified by previous SB revision.

COMMENT 4

Paragraph 5) states modification of aeroplane with previous SB revision 27-3137 and 27-4136 constitutes terminating action for the repetitive inspections as specified in A330 ALS part 4 task 274400-00001-1-E, 274400-00001-2-E, 274400-00001-3-E, 274400-00001-4-E:

Repetitive inspections as specified in A330/ A340 ALS part 4 task 274400-00001-1-E, 274400-00001-2-E, 274400-00001-3-E, 274400-00001-4-E are similar to requirements defined in paragraph 1.1) because these ALS part 4 tasks call for SB 27-3102 and SB 27-4107 application.

- It would be clearer to transfer in PAD from paragraph 5) to paragraph 1.1), A330/A340 ALS part 4 tasks references.

- Then, when modifications as stated in paragraph 5) are carried out, PAD should mention: it constitutes terminating actions as required by paragraph 1) and 1.1)

COMMENT 5

Regarding paragraph 6): it is mentioned:

Modification of an A340-200/-300 aeroplane in accordance with instructions of SB 27-4143 and 92-4056 R03 constitutes terminating action for the repetitive actions as

required by paragraph 1) of this AD.

- Paragraph 6) of PAD should be revised to mention it constitutes terminating action for the repetitive actions as required by paragraph 1) and paragraph 1.1) only because paragraph 1.2) is dedicated to THSA greasing and remains valid.

COMMENT 6

Regarding paragraph 7): it is mentioned: Modification of an aeroplane as required by paragraph 2), 3), 4) of this AD constitutes terminating action for the repetitive actions as required by paragraph 1) of this AD.

- Paragraph 7) of PAD should be revised to mention that it constitutes terminating action for the repetitive actions as required by paragraph 1) and paragraph 1.1) because paragraph 1.2) is dedicated to THSA greasing and remains valid.

- Paragraph 7) of PAD should be revised to remove " For A330-200/-300 and A340-200/-300 aeroplanes: The ALS tasks as specified in paragraph 5) of this AD, as applicable" provided that ALS tasks references are mentioned in paragraph 1.1).

COMMENT 7

- Paragraph 8) of PAD should be simplified and should mentioned THSA PN only that not have to be installed.

EASA response:

Your comment 1: By definition, a AMOC is an 'alternative' (to an AD action) and cannot be considered 'mandatory' by itself. EASA provide AMOC approval only to the AMOC applicant, who becomes AMOC approval holder, therefore EASA do not publish EASA AMOC on EASA AD publishing tool. For these reasons, no mention to these specified AMOC can be made in the AD. In addition, this AD is issued to require accomplishment of modification in-service and does not address the lubrication that is addressed by the mentioned AMOCs. The AD does not require the lubrication in general, which is managed by ALS Part 4. The AD only requires 'incidental' lubrication following specific ECAM messages.

Your comment 2: See answer to your comment 1

Your comment 3: Comment understood. As the AD is complex, the combination of the both tables would not improve the AD reading.

Your comment 4: Comment understood but not agreed because by doing that, this AD will mandate the ALS Part 4 tasks which are covered by a specific AD dedicated to ALS part.

Your comment 5: Comment agreed. Please refer to updated Note1

Your comment 6:

-

- ***Comment agreed. Please refer to updated Note1***

- ***Comment understood but not agreed. We need to keep this requirement in order to take into account all possible configurations.***

Your comment 7:

The purpose of paragraph (9) [was: §(8)] is to allow operators, that have aeroplanes to be modified in service, to install pre-modification THSA until the aeroplane becomes post THSA modification. This is the intent of paragraph 9.1). It also prohibits installation, from the effective date of this AD, of a pre modification THSA on an aeroplane that received a post modification THSA during production. This is the intent of paragraph (9.2). The alternative option would be to prohibit installation of a pre-modification THSA on any aeroplane, from the effective date of this AD, that would be penalising for some operators. No changes have been made to the Final AD in response to this comment.

Commenter 4: Air France – Eric Pesce – 17/06/2014

In order to clarify some points about the aircraft applicability and configuration, please find below our additional comments further to PAD N°14-080, specially concerning the ATA 92 and our A330-200/-300 and A340-300 Fleets:

Comment 1/ : As for the ATA 27 comments, we also agree with the same remarks for the ATA 92 :

In paragraph 2) of PAD N°14-080 :

It is mandated to embody latest SB revision not later than 31 December 2016:

Paragraph 3 and paragraph 4) can cause confusion because it calls for application of SBs revision given in table 1 of paragraph 2) or table 2 of paragraph 4).

Query : In order to render this PAD comprehensible, table 1 and 2 should be included in paragraph 2) and note should be added to require additional work for aeroplane already modified by previous SB revision.

Comment 2/ : In paragraph 3 of this PAD, it is written:

For aeroplanes **that have already been modified** (installation of CSP on the THSA and electrical harness) before the effective date of this AD, in accordance **with the instructions of any previous revision of an Airbus SB as listed in Table 1** of this AD, as applicable to aeroplane type, **accomplish the applicable additional work as specified in the Airbus SB revision listed in Table 1 of this AD.**

Table 1 – Applicable SB for modification : Electrical harness: SB A330-92-3046 REV 06 or SB A340-92-4056 REV 04, as applicable.

AND

In paragraph 4 of this PAD, it is written:

For aeroplanes having one of the THSA P/N listed in Table 2 of this AD which are compliant with CSP installation as required by paragraph (2) of this AD, verify whether the electrical harness is installed on the aeroplane and, **if found to be not installed, modify the aeroplane to install the electrical harness in accordance with the instructions of Airbus SB as defined in Table 2 of this AD.**

Table 2 - Electrical harness installation on the aeroplane : Applicable SB: SB A330-92-3046 REV 06 or SB A340-92-4056 REV 04, as applicable.

Some A340 aircraft in our fleet **have been already modified as per SB A340-92-4056 REV 02 and have been already modified or will be modified soon as per SB A340-92-4056 REV 03 "additional work".**

Reason :

These aircraft are in config 005 thru Config 008. Consequently, as per the mention below of the last SB 92-4056 REV 04, these aircraft have "no additional work required" and therefore these aircraft from Conf. 005 thru Conf. 008 are not concerned by this SB REV 04.

So, these aircraft will be modified **as per SB 92-4056 REV 03 and not as per SB 92-4056 REV 04**, as indicated in your Table 1 and in your Table 2.

Query :

To be in accordance with the PAD N°14-080 :

- A-** Is it correct for you ? (to have aircraft modified with SB Rev 03 "additional work" and not with SB Rev 04 "additional work").
B- Is the mention "as applicable" included the modification as per previous SB revision 03 for aircraft in Conf 005 to Conf 008 ?
C- If not, could you clarify the PAD ?

SB A340-92-4056 REV 04 :

ADDITIONAL WORK

****CONF ALL**

- Additional work is required by this revision for aircraft of Config. 001 thru Config. 004.
- **No additional work for Config. 005 thru Config. 008 introduced by this revision.**
- For Config. 005 and Config. 006 Additional Work has been previously required by Revision 02 for aircraft modified by previous issue 00, 01.
- For Config. 005 and Config. 006 Additional Work has been previously required by Revision 03 for aircraft modified by previous issue 00, 01, 02.
- For Config. 001 and Config. 006, Additional Work has been previously required by Revision 03 for aircraft modified by previous issue 00, 01, 02.

D - We have the same remarks for the aircraft A330-200/300 of our fleets in Conf. 005 thru Conf. 009, which have been already modified with previous SB A330-92-3046 revision 04 or 05 and not with the last SB 92-3046 Revision 06.

SB A330-92-3046 REV 06 :

ADDITIONAL WORK

Additional work is required by this revision for aircraft concerned by Config. 001, 002, 003, 004, modified by any previous issue.

For Config.005 thru Config.009 no additional work is required by this revision for aircraft modified with any previous issue.

EASA response:

Your comment 1: Comment understood. Paragraph (2) is the main action of this AD which is to mandate the CSP and associated wiring installation to cover the unsafe condition and by the way to cancel the associated repetitive inspections. The current SB revisions are taken into account further to EASA procedures. Partial credit is given for actions in accordance with a previous SB revision, but additional work is required. The other paragraphs take into account in service possible configurations to help the operators.

Your comment 2:

- A. paragraph (3) has been amended to indicate that the additional work is applicable “depending on the aeroplane configuration”. For your configuration, if SB 92-4056 REV 04 does not introduce additional work, compliance with the AD requirement is based on SB 92-4056 REV 03.**
- B. See answer to A above**
- C. See updated paragraph (3) to take into account aeroplanes configurations**
- D. Same answer as above**

Commenter 5: Iberia – Luis de Benito Abad – 21/05/2014

It classifies the A330/A340 in three groups depending on Service Bulletins accomplished or Modifications embodied in production. This classification is clear for IBE

aircraft referring to A330, A340-300 and A340-600 from MSN 960 to MSN 1122. But there are 12 aircraft A340-600 which are not included in none of those groups. Should a fourth group exist to include the remaining aircraft? Please, could you clarify the situation?

EASA response:

Comment understood.

As a reminder, please note that the intent of this (P)AD is: all aeroplanes equipped with a specific THSA P/N and modified with additional electrical harness. This can be accomplished by Airbus modifications in production or accomplishment of several Airbus Service Bulletins at specific revisions in service. After embodiment of these modifications on an aeroplane, the repetitive inspections of the ballscrew assembly for integrity of the primary and secondary load paths is no longer required because the failure is detected automatically by this new device (improved THSA + harness).

As this (P)AD is very complex and we think that some clarifications were necessary for making sure that Iberia analyse properly and identify what actions have to be accomplished for all your aeroplanes, it has been decided not to wait for the end of the consultation period to answer your queries.

First point, this AD is applicable to all aeroplanes that are identified in the Applicability section of the (P)AD and, in principle, all actions have to be accomplished.

However, we also confirm that, for the purpose of this (P)AD, groups of aeroplanes were defined but, in this specific case, groups are defined and used for excluding some aeroplanes for accomplishing certain actions. That is the statements “For all aeroplanes, except Group 1, Group 2 and Group 3 aeroplanes:” above paragraph (1) of this (P)AD and “For all aeroplanes, except Group 2 aeroplanes, no later than 31 December 2016, accomplish the actions as specified in paragraph (2) or (3) or (4), as applicable” above paragraph (2) of this (P)AD.

Let’s take an example to illustrate the situation for an A340-600 aeroplane. Again, in principle, all actions have to be accomplished. However, let’s consider that this aeroplane was modified in production with Airbus modifications 55882 and 52191 and 56058 (this means the example is a Group 2 aeroplane), in this specific case:

Paragraph (1) is not applicable;

Paragraphs (2), (3) and (4) are not applicable;

Paragraphs (5), (6) and (7) are ‘credit’ paragraphs related to terminating actions as a result of actions required by paragraph (2) or (3) or (4);

Paragraph (8) is not applicable;

Consequently, Paragraph (9) is the only applicable paragraph for Group 2 aeroplanes. This does not require ‘corrective action’ but has the purpose to prevent (prohibit, actually) the introduction of the unsafe condition on a post-mod aeroplane.

A similar exercise can be done for any other aeroplane, either as defined in one of the Groups, or outside the groups – remember, these are not for ‘inclusion’ but for ‘exclusion’ for certain actions.

That explains, we hope, the rationale for defining and using Groups of aeroplanes.

Now, if Iberia identify that some aeroplanes in their fleet do not ‘fit’ into any Group, as defined for this (P)AD, that may mean that all corrective actions (as applicable to the configuration of the aeroplane) are required and must be accomplished.

Commenter 6: Lufthansa Technik – Daniel Otto – 10/06/2014

Based on A340-600 example below I would like to add the following question from a technical point of view.

Example:

DLH **A340-600** D-AIHP has been **retrofitted per SB** with both, THSA and Harness.

This A/C “Config” (retrofitted per SB) is not contained in any “Group”.

(P)AD §(1) requires action (1.1 DI and 1.2 LUB) for **all except** Group 1,2,3 aeroplanes, thus action needs to be taken for D-AIHP, as well.

However **no** action is required on

D-AIHZ **A340-600 post MOD ex production** (Group 2) or

D-AIFF **A340-300 retrofitted per SB** (Group 1)

Can you please explain technical differences (between MOD ex production & retrofit SBs) as from our point of view A340-600 retrofitted per SB should be excluded from action as per §(1), as well and final AD should consider this.

EASA response:

If the aeroplanes mentioned in this comment are post modification, either by production modification or in-service modification, and are identified as being part of Group 1 for one aeroplane and Group 2 for the other aeroplane, then paragraph (1) is not applicable to these aeroplanes. Please also refer to paragraph (7) first point.

Please note that the groups as defined for this AD have been created for ‘exclusion’ and not for ‘inclusion’, for accomplishing certain actions.

No changes have been made to the Final AD in response to this comment.

Commenter 7: Qantas – Anthony Ke – 17/06/2014

Please see below and refer attachment for comments provided by QFA.

In summary (and with respect to the fully-modified status of QFA/JST A330 fleet):

- Content of this PAD has grown (from its last unofficial draft dated JAN14) and becomes complex to read.
- The matrix that defines the 3 groups of aircraft is clear but references to all the latest Airbus SB revisions have been deliberately left out even though it would not otherwise cause any conflicts with the rest of the requirements (unless it is meant to cater for the situations of other A330 and A340 operators?). The same goes for Paragraph (5).
- Paragraph (1.2) specifies new lubrication requirements following display of certain fault messages. Whilst this can be accomplished in accordance with the referenced A330 ALS Part 4 tasks, the two requirements – one being an on-condition maintenance action before next flight and the other A330 ALS Part 4 tasks being repetitive actions regardless of aircraft configurations – should be treated separately where terminating action is concerned. Current wording used in Note 1 could cause some confusion.
- Paragraph (5) thru (7) could be reorganised and condensed into one short paragraph and, at most, an additional note to accept prior incorporation of earlier revisions of the relevant Airbus SB as terminating action for the corresponding A330 ALS Part 4 tasks.

EASA response:***Comment understood.******EASA confirm that the subject is complex, hence the complicated AD.******For the issue related to the definition of Groups for the purpose of this AD, please note that the groups as defined for this AD have been created for 'exclusion' and not for 'inclusion', for accomplishing certain actions.******As for paragraph (1.2), it only requires accomplishment of a lubrication action following an ECAM message. This specific action only can be stopped once the aeroplane is modified in accordance with requirements of this AD. As for the generic ALS tasks as specified in paragraph (1.2), they are not affected by this AD and remain applicable even for post modification aeroplanes. As for Note 1, indeed it has been amended to clarify.******As for your comment related to paragraph (5) thru (7), it is not agreed as each paragraph address different actions and aeroplane configuration. No changes have been made to the Final AD in response to this specific comment.***