

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-103R1 [Published on 08 July 2014 and officially closed for comments on 25 July 2014]

Commenter 1: China Southern Airlines – ZHAO HENG – 11.07.2014

Comment # 1

The affected serial numbers (BEBE-0000 to BEBE-9999 inclusive) are added in PAD 14-103 and 14-104. However these serial numbers were not listed in any correlative documents (AD 2012-0055, 2012-0083, B/E Aerospace SB 1XC22-0100-35-006, 1XCXX-0100-35-005, 22CXX-0100-35-003 etc.). The compliance time for B/E Aerospace in the two PADs has been expired by now. That means there is no any time for operators to complete the PADs for serial numbers added(manufactured by B/E Aerospace).

Question: Could you please confirm that the serial numbers (BEBE-0000 to BEBE-9999 inclusive) have to be added? If yes, please provide a logical compliance time.

EASA response:

Comments accepted. EASA confirms that the additional s/n (as well as some others already listed) were actually manufactured by DAe Systems. The Final AD has been amended accordingly to allocate the new compliance time for those s/n groups only. The compliance time (currently expired) for units manufactured by B/E Aerospace remains unchanged.

Commenter 2: Saudi Arabian Airlines – Jihad Oraif – 20.07.2014

Comment # 2

PAD 14-103R1 for B/E Aerospace Oxygen Containers that have compliance Time with 5,000 FC, or 7,500 FH or 24 Months whichever occurs first after 17 April 2012.

PAD 14-104R1 for B/E Aerospace that have compliance Time with 5,000 FC, or 7,500 FH or 24 Months whichever occurs first after 20 Sept 2011.

Wouldn't this make the PAD expired? considering the 24 Months occurred first. 14-103R1 expired since 17 April 2014 and 14-104R1 expired since 20 Sept 2013.

SVA would like to inquire if the Compliance Time is correct or it is a Typo error and should be similar like DAe System Oxygen Containers that the Compliance Time is after the Effective Date.

This inquiry is due to the PAD new requirements for the new batch of Serial Numbers which will require additional Work on the Chemical Oxygen Container Assembly on affected Aircraft.

EASA response:

Comments partially accepted. The fact that a compliance time is expired does not prove that all aircraft have indeed been modified – at this time, only States of Registry can effectively verify AD compliance and EASA does not have jurisdiction outside Europe.

For the other aspects of these comments, see answer to Comment #1 above.

Commenter 3: China Southern Airlines – ZHAO HENG – 21.07.2014
Comment # 3

Seven aircraft are involved with the serial number extended in CSN fleet. And the total quantity of containers are 214. One snapshot of them is attached. It is impossible for China Southern Airlines to complete final ADs if the compliance time of two final ADs are according to the two PADs.

CSN expects EASA to update compliance time for serial number added for CSN at least.

EASA response:

See answer to Comment #1 above.

Commenter 4: Lufthansa Technik AG – Christian Dimter – 24.07.2014
Comment # 4

Concerning PADs 14-103R1 and 14-104R1 which have been distributed for consultation, LHT would like to comment on the changes made from PADs in Rev. 0 to Rev. 1.

The PADs were initially made (Rev.0) in order to include oxygen generators carrying the company name “DAe Systems” on their ID label. This change alone would not have posed any big differences to the initial content of their respective preceding ADs 2012-0055R1 and 2012-0083/2011-0167, because the content of the ID label was not really the main part of the identification process of affected/non-affected generators. The actual identification was done by P/N+S/N combination. Therefore, I think that not much additional action due to the new PADs searching for “DAe Systems” generators would have been necessary to most operators.

However, with the Rev. 1 of the PADs, one set of S/Ns has been added to the list of affected S/Ns: BEBE-0000 to BEBE-9999.

This DOES make a difference to the preceding ADs, as a “new” set of affected S/Ns has been added, which was not initially part of the inspection. This means, re-inspection of already inspected A/C might be necessary for operators who did not keep records of the P/N+S/N combinations identified during their previous inspection acc. ADs 2012-0055R1 and 2012-0083/2011-0167. Keeping track of this information was not required by the ADs, so it cannot be taken for granted that all operators took down such information.

I do not know, whether generators of the S/N BEBE-0000 to -9999 carry “BE Aerospace” or “DAe Systems” on their ID label. If the ID label carries the name “BE Aerospace”, the initial time limit of 5000FC or 7500FH or 24MTH from 20.SEP 2011 is long past and therefore cannot be reached by anyone. Even if the label carries the name “DAe Systems”, the time limits proposed in the PADs are only reachable with great additional effort, as no suitable downtimes might be within the timeframe

of 12MTHs, the A320 C-Check interval being 24MTH.

In my opinion, a new time limit is necessary for the search for generators carrying S/N BEBE-0000 to -9999. This time limit should be based on the limit of the initial inspection (5000FC or 7500FH or 24MTH), but starting from the date of issue of the NEW AD. Credit should be given for actions already taken for compliance with the existing ADs, e.g. operators who took records of P/N+S/N should be allowed to use this information in order to document compliance also to the new S/N BEBE-0000 to -9999 requirements.

EASA response:

Comments accepted. The statement 'required as indicated, unless accomplished previously' is the standard way to give credit for actions already taken. For the other aspects of these comments, see answer to Comment #1 above.