


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-165</p> <p>[Published on November 2014 and officially closed for comments on 08 December 2014]</p>

Commenter 1: Singapore Air – Cheekheong Aw – 11/11/2014

Comment # 1

With regards to paragraph (5) and (6) of EASA PAD 14-165 below are the comments:

1. The paragraph of the affected ADs (2011-0197, 2011-0204R1, 2013-0274) should be stated instead of the words "... also constitutes compliance with the requirements of EASA AD ...".
2. It would be appropriate to also revise the affected ADs (2011-0197, 2011-0204R1, 2013-0274) to state that compliance with this AD (PAD 14-165) is an alternative method of compliance to the affected paragraphs.

EASA response:

Comment not agreed. The purpose of paragraphs (5) and (6) is indeed to avoid amending the ADs specified in those paragraphs.

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

Commenter 2: Qantas Airways Limited – Hish Hamdan – 11/11/2014

Comment # 2

Regarding the subject PAD, Qantas would like to request for the 'Ref. Publications' of the AD to be amended as follows:

The line "The use of later approved revisions of the above documents is acceptable for compliance with the requirements of this AD" to be moved to the bottom, underneath the listing of the Hamilton Sundstrand SBs.

Qantas has had issues with this set-up previously, more notably with EASA AD 2011-0204 (RAT Actuator), where AMOCs were required by the local regulatory authority to comply with the AD by using later revisions of the Hamilton Sundstrand SBs. The AD was eventually revised to reflect the later revisions. This causes unnecessary work for the airline. Later EASA AD 2013-0274 was issued (RAT Pump) and the statement "The use of later approved revisions of the above documents is acceptable for compliance with the requirements of this AD" was at the bottom, underneath the listing of the Hamilton Sundstrand SB.

To remain consistent with the way how EASA AD 2013-0274 was laid out in the 'Ref. Publications' field, Qantas recommend that the subject PAD is set up in the same

way which will avoid additional work for the airlines, and also avoid re-work for EASA to revise the AD just to reflect later revisions of the Hamilton Sundstrand SBs.

EASA response:

Comment not agreed. After some coordination with Airbus, it seems that, for this specific case, the applicable HS SBs are not entirely under the responsibility of Airbus DOA. That is the reason why HS SBs must remain under the statement “The use of later approved revisions of the above documents is acceptable for compliance with the requirements of this AD”.

Commenter 3: Thomas Cook – Daryl Thomas – 14/11/2014

Comment # 1

With reference to PAD No: 14-165 to assist with clarification as to the applicability, could a note please be added to reflect the following:

Those equipped with Liebherr Actuators are not affected by the requirements of this AD, but future replacements must be in accordance with the requirements of HS SB No. ERPS06M-29-21.

I ask this as our entire fleet is equipped with the Liebherr actuators and in realistic terms the AD is not applicable, only in when the existing Liebherr actuators are replaced and no replacement Liebherr actuator is available, it must be replaced with a new actuator (PN 5917109-1, PN 5917109-2, or PN 1720399).

Any assistance would be greatly appreciated.

EASA response:

Comment not agreed. For A330 and A340-200/300 aeroplanes (for which HS SB No. ERPS06M-29-21 is to be used), it is clearly specified in paragraph (2) of this (P)AD that the actions must be accomplished if the manufacturer of the actuator of the RAT is Arkwin Industries, meaning that if the manufacturer of the actuator of the RAZT is not Arkwin Industries, no action is to be accomplished.

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