



EASA

European Aviation Safety Agency

Questions received before AD Workshop

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➤ “Case 1 - AD Airframe timeline definition”

- AD-2015-0212 threshold standard is different from AD-2015-0219 & 2015-0218 where one stated counts from first flight and other two from TOT where AIB related SB A330-53-3227, SB A330-53-3228, SB A320-53-1299, SB A320-53-1292, SB A320-53-1293 & SB A320-53-1294 compliance time are written as after aircraft manufacture. Is there a document defining the definition of first flight and aircraft manufacture?



➤ Case 1 - Definition

➤ What is known by all operators:

- Date of Manufacture: Transfer of Title (TOT)
- FC/FH accumulated by the aeroplane since first flight

➤ What may not be known by all operators

- Date of aeroplane first flight

➤ Definition Date of Manufacture:

Note 1: For the purpose of this AD, the date of manufacture is the date of transfer of title, which is referenced in Airbus documentation at the time of first delivery to an operator.

- Date of aeroplane first flight: No definition and should preferably not be used when Compliance Time is expressed in calendar time.



- “Case 2 - AD component manufacturer date issue”
 - AD 2015-0219 specifies the component manufacture date is from aircraft TOT. However, for other ADs, such as AD2015-0079, the component manufacture date is not defined clearly. Shall we use date of TOT or from the aircraft first flight? Is there a document to clarify this?



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- “Case 2 - AD component manufacturer date issue”
 - No document to clarify, but no need in this case.
 - AD 2015-0219: ‘Within 6 years after the aeroplane date of manufacture’
 - AD 2015-0079: ‘For an affected upper cardan pin on an MLG, before exceeding 96 months since its latest installation on an aeroplane’



- “Case 3 - AD vs SB applicability misalignment due to latest modification/product”
 - In SB A330-71-3032 explicitly stated that accomplished this SB will cancel SB A330-71-3025 which mandated by AD 2011-0062. However, AD 2011-0062 specified repetitive inspection is required to all Engine Air Intake Cowl, therefore, without EASA has yet to revise the AD hence operator cannot withdraw this inspection task in their AMS.
 - Operator has followed up with EASA on this issue but feedback without definite timeline nor any formal statement. Will EASA consider establish a process to address and handling this kind of issue under circumstance?



➤ Case 3 - AD vs SB applicability misalignment due to latest modification/product

- In this specific case, yes. New AD is being prepared to address the issue.
- In general:
 - Terminating action is optional: AD is revised.
 - Terminating action is optional but an additional inspection is required for non-modified aeroplanes: New AD is prepared.
 - Terminating action is required: New AD is prepared with a defined compliance time for the accomplishment of the modification.



➤ Case 4 - AFM TR removal requirement

- There are some questions associated with the management of Airworthiness Directives that are to be inserted in the AFM as part of the instructional requirements of the AD:
- For AD 2015-0135 Para(8) & (9), inserting AIB AFM TR502 or Appendix 1 in AD into the Section “Emergency Procedures” is mandated by EASA AD 2014-0266-E which later superseded by 2015-0087 & 2015-0135.
- What if Captain & First Officer both position AOA sensors replaced with Thales P/N: C16291AB then isn't that Para(8) & (9) are not longer required? Shall the AFM TR or Appendix 1 be removed under circumstances? Will new revision to be issued to incorporate this statement?
- AD 2014-0281 requires operator to insert the TR to AFM, or use the later revision of AFM, with no instruction of when it can be removed. Does it mean that there is no terminating action and this AFM change shall remain unless another AD supersedes it?
- AFM related AD usually requires to insert the AD copy / TR into certain section of procedure. Is it an acceptable means of compliance to manage these AD copy / TR in a separate Airline AFM Supplement Section which is created for this purpose, as part of the Airline AFM?



➤ Case 4 - AFM TR removal requirement

- AD 2015-0135: regardless AoA configuration, amendment of AFM is still applicable and required with Paragraph (8) of this AD (paragraph retained from EASA AD 2014-0266-E).
- AD 2014-0281: AFM TR as specified in that AD are still applicable.
- Method of compliance: this question is related to 'HOW' to comply and this is part of AD enforcement (Responsibility of State of Registry). If the result of a method is that aeroplane is operated accordingly (AFM TR), EASA has no objection.
- In general, if an AD requires amendment of an AFM, amendment is applicable until a new or revised AD is published providing different requirements.



➤ Case 5 - Means of “Emergency” AD classification

- AD-2015-0192 for aft cargo door inspection task no grace period is provided for aeroplane that fall into AD Table 3 – Never inspected. Numerous in service fleet is exceeded 12,550FC since first flight at the time AD issue or even SB issuance date. No matter PAD was issued earlier or AIB ASAC is obtained. In the concern to raise alert to operators, why wasn't this AD classify as Emergency AD when result of immediate AOG upon AD effective date is happening?



➤ Case 5 - Means of “Emergency” AD classification

- AD-2015-0192: This AD was issued as PAD 15-101. Comments received but none of them related to the threshold for that inspection.
- Please review all PADs to avoid such situation.
- EASA has no reliable information on fleet status.
- In general: do not mix compliance time for an AD action and grace period for an AD action.
 - Compliance Time for an Emergency AD: threshold is less than 30 days after the effective date of the AD or equivalent in FC/FH
 - Grace period: To avoid any AOG situation for products that are close to or have exceeded a threshold.



➤ Case 6 - RC (Required for Compliance) Steps identification

- In FAA AD and Boeing SB, there is the concept of RC (Required for Compliance), usually with the statement in SB as follows:
- “Some steps in the Work Instructions are identified as Required for Compliance (RC).
- If this service bulletin is mandated by an Airworthiness Directive (AD), then the steps identified as RC must be done to comply with the AD. Alternative procedures for steps not identified with RC can be used if the RC steps can still be done as specified, and the airplane can be put back in a serviceable condition. An Alternative Method of Compliance (AMOC) is not necessary for deviations to steps that are not identified as RC.”
- However, in EASA AD and Airbus SB, no similar guidance is given to the operator. Will EASA/Airbus introduce the RC or similar procedure in the future?



- Case 6 - RC (Required for Compliance) Steps identification
- Airbus has introduced the following in their new SBs, since September 2013:
 - “This Service Bulletin is classified mandatory or expected to be classified mandatory by an Airworthiness Directive (AD). The paragraphs 3.C. and 3.D. in these accomplishment instructions are Required for Compliance (RC) and must be done to comply with the AD. Other paragraphs are recommended and may be deviated from, done as part of other actions or done with accepted methods different from those given in the Service Bulletin, as long as the RC paragraphs can be done and the aircraft can be put back into a serviceable condition.”
- EASA AD will not refer to paragraphs 3.C. and 3.D of Airbus SB, as it is deemed that the explanation contained (now as a standard) in Airbus SBs clarifies pretty well what is “required for compliance” with the AD and what is not.
- AMOC is necessary only to cover any deviation from Airbus SB instructions, if such deviation is affecting RC steps of paragraphs 3.C. and 3.D.



➤ Case 7 - Applicability for Appliance related AD

- How does EASA determine when to adopt an appliance AD?
- How does EASA know whether such appliance is installed on an EU aircraft?
- The applicability will list certain aircraft type in a table, with the statement: “but not limited to the airplanes identified in table xx”. This is very difficult for the operator to determine the applicability of the AD. Can the applicability be written in more specific way?



➤ Case 7 - Applicability for Appliance related AD

- Adopted?? Published???
- Already covered on 9/12/2015



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- Case 8 - Service Bulletin and Modification Number cross reference in ALS
- Airbus SB no. and Mod no. is correlated in Airbus ALS. To help decide modification status, suggest EASA/AIB to provide cross reference table for SB and Mod number in ALS.



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- Case 8 - Service Bulletin and Modification Number cross reference in ALS
- Point is noted. Is that more for Airbus?



- Case 9 - Compliance time requirement simplification
- Occasionally EASA AD and Airbus SB is written in a complex way such as requirements accounted from existing tasks, includes various modification and/or referring multiple table which can be over-complicated and difficult to pinpoint exact requirement and compliance time. Can EASA AD and Airbus SB written in a simpler and harmonised way?



➤ Case 9 - Compliance time requirement simplification

- Point noted. Compliance Times specified in AD reflect what is in Airbus SB.
- Complicated Compliance Times come from numerous aeroplane configurations.
- Effort made by DAH to support operators.
- When possible, Threshold is complicated but interval is the same for all.
Example: EASA AD 2015-0192 (Cargo door AD).
- Operator might be penalised under certain condition.



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