

Comment to FAA-2004-19227

Comment from Airbus
Comment by Didier Auriche

Comment:

Tim,

I have just received the NPRM 2003-NM-95-AD and I have few comments on it. I have not followed the formal "DMS" procedure as I am not sure that all my comments should be dully tracked in the frame of this specific NPRM.

First comment :

In the "administrative" part of the NPRM, the SB 24-0099 is correctly referenced.

In the "PART 39" of the NPRM, the SB 24-0099 wrongly becomes SB 27-0099. Typo is to be corrected.

Second comment :

I do not understand the content of the paragraph "Difference between the French AD and this proposed AD".

The NPRM states that the AD is applicable to A/C that have already been modified IAW SB 24-0099, 24-6082, 24-2088.

The target of the DGAC CN was to minimize the burden of operators that have embodied the SB before the CN issuance.

The way to comply with the CN is then to declare that SB 24-XXXX has already been accomplished. If SB 24-XXXX is not accomplished, the CN is valid till SB 24-XXXX is declared accomplished.

I do not see big differences between accomplishment of an SB before AD issuance and accomplishment of an SB after AD issuance.

What is the FAA concern? Is it based on FAA findings (e.g. audit of operators, safety reco, etc.)?

Then, will it become a general FAA policy?

Third comment :

In the French CN, the embodiment of the SB 24-0099, 24-6082, 24-2088 is also a way to come back to the initial DGAC MMEL requirements.

This issue is not mentioned in the FAA NPRM.

Could you refresh my memory on this issue, was it because the FAA MMEL requirements were more restrictive than the DGAC MMEL? or is it due to other reasons?

> Best regards

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> Didier AURICHE

> Continued Airworthiness WB
> Office of Airworthiness - EAWA
> Airbus Central Entity
>
> Phone : 33 (0)5 61.93 48.23
> Fax : 33 (0)5 61.93 45.80
> Mailto : didier.auriche@airbus.com
>

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