


EASA	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 12-018</b> <b>[Published on the 23 February 2012 and officially closed for comments on the 22 March 2012]</b>

**Commenter 1: Volaris – Ernesto Moreno Lopez – 27/02/2012**
**Comment # 1**

With respect to the PAD 12-018 I think that the VSB (22CXX-0100-35-003 rev 1) is contradictory in the page 15.

In this page in the note for caution is described that “always use a new manifold”, but in the step b) of this page describe that “If the used manifold has free flow and no damage, you can use it again” (See the figure attached below).

For the PAD we understand that the manifold will be replaced, but I think that this point need be clarified in the VSB.



Figure 7

**CAUTION:** ALWAYS USE A NEW MANIFOLD. A DEFECTIVE MANIFOLD MAKES THE OXYGEN GENERATOR UNSERVICEABLE.

(b) **If the used manifold has free flow and no damage, you can use it again.**

**CAUTION:** ENSURE THAT THE MANIFOLD IS EQUIPPED WITH A BLUE SILICON RING USED AS A SAFETY RELIEF VALVE AS SHOWN IN FIGURE 4.

Original Issue  
MAR/17/2011  
Page 15 of 38

Rev.: 1  
DEC/20/2011

**SB 22CXX-0100-35-003**

**EASA response:**

**Comment understood. Airbus considers that a change on the VSB is not urgently necessary. The manifold is already discarded as per VSB instructions 3 C. (3) (e) on page 13. An update could be considered at next VSB Revision opportunity.**

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

**Commenter 2: Avianca – Diogo B. Youssef – 06/03/2012**

**Comment # 2**

In accordance with revision reason of PAD 12-018 (EASA AD 2011-0167), the PAD are proposing to add the A318-121 and A318-122, as this AD will work on all O2 Containers of our A318 fleet, we would like to ask to EASA evaluate the possibility of modification of accomplishment deadline on PAD 12-018 to occur concurrently with PAD 12-017, regarding that actions proposed by PAD 12-017 are on the same component.

**EASA response:**

***EASA disagree. The Compliance time of this AD is to be counted from the effective date of EASA AD 2011-0167. An extension of the compliance time for A318-121, A318-122, that has been lately added in the applicability section of this AD, has not been considered, because the risk assessment for this issue has been done considering all the fleet , and independently of the risk assessment done for the PAD 12-017.***

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

**Commenter 3: Lufthansa Technik AG – Christian Dimter – 04/04/2012**

**Comment # 3**

Concerning EASA AD 2011-0167 and PAD 12-018, which is supposed to supersede the before mentioned EAD for addition of further A/C types and clarification of affected containers, Lufthansa Technik (LHT) would like to re-iterate a request posed earlier on for detailing on which containers action is to be performed.

As the PAD 12-018 is written at the moment, it requires in paragraph (1) to identify the P/N and S/N of each installed container. This may be done via review of airplane documentation if reliable, or by direct reading of P/N+S/N label located on the backside of the containers.

Only in step (2) the action to be taken on affected containers is described, detailing which containers are to be regarded as affected and which not.

I understand that affected containers are ONLY containers manufactured by BE Aerospace, carrying a BE Aerospace nameplate with P/Ns listed in table 1 of the PAD and S/N listed in table 2 of the PAD. These are all containers called the “Hybrid” container by BE Aerospace (P/N ending with -0100).

DLH (and many other operators) have A/C delivered long before the Hybrid containers were even developed. A majority of these A/C are equipped with containers from the previously not-BE Aerospace-owned companies Draeger and Puritan Bennett. They all have P/Ns not listed in table 1 of the AD/PAD and are therefore not affected by the AD/PAD.

According to the AD/PAD step (1), the P/N end S/N even of these containers has to be verified and compared to the table 1 in the AD/PAD, even though they are not affected (as is detailed only in step (2)).

The readout process of P/N and S/N is a time-intensive task, as the entire container has to be lowered in order to see the nameplate on the backside of the container. However, there is a reliable way of distinguishing Draeger and Puritan Bennett containers from BE Aerospace containers by the way their door stop operates.

Picture 1 shows the operation of a Draeger container:

The surface of the test button remains parallel to the surface of the container door.

Puritan Bennett operates very similarly.



Picture 2 shows the operation of a BE Aerospace container:

The surface of the test button is at a 90° angle to the surface of the container door.



We would like to use this quick and reliable method to exclude the Draeger and Puritan Bennett containers (roughly 90% on DLH fleet) from the requirement of P/N+S/N identification by nameplate readout.

All containers with the door stop mechanism operating as in picture 2 naturally would have the full P/N and S/N identification as requested by step (1).

With this method, A/C delivered with Puritan Bennett or Draeger containers, on which a BE Aerospace Hybrid container might have been installed as replacement part, can be inspected within a very much shorter timescale at NO REDUCTION in reliability.

We therefore kindly ask you to review if you can agree to LHT using this alternative inspection method to exclude non-affected containers from the P/N inspection required by step (1) of the AD/PAD.

***EASA response:***

***Comment understood. The proposed alternative inspection method to exclude non affected containers from the P/N and s/n identification as required by paragraph (1) of this AD has been confirmed and improved by Airbus.***

***The Final AD has been updated to introduce this alternative inspection method.***