

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-103

[Published on 06 June 2019 and officially closed for comments on 04 July 2019]

### Commenter 1: Air France – Lionel Rodrigues – 14/06/2019

#### Comment # 1

Further our analysis, AFR is pleased to provide the following information:

1. Could you confirm that is it permitted to perform the inspections of each door separately on different check or do we must perform all inspections all together at the same check?
2. On Friday 7th June during Webex, Airbus informed all airlines that A/C not yet delivered will be inspected in FAL, in that case could you confirm that next inspection will be within 12 months after Airbus date of manufacture?

#### **EASA response: Agreed.**

1. **EASA confirms that the door inspections can be performed separately during different checks (provided that the individual 12 month interval is not exceeded).**
2. **EASA confirms that after AOT accomplishment on production aircraft the next inspection is due within 12 months after aircraft date of manufacture. This is stated in the inspection section of the AD “Within 4 months after the effective date of this AD, or within 4 months after Airbus date of manufacture, whichever occurs later,...”**

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

### Commenter 2: Cathay Pacific Airways – Peter Pang – 21/06/2019

#### Comment # 2

Cathay Pacific have reviewed the EASA Proposed AD issued on 06 June 2019, PAD No. 19-103, regarding the Airbus A350 Door system and would like to provide the following input.



1. In Paragraph 4 it is required that inspection results be reported back to Airbus within 90 days regardless of findings. Cathay would like to enquire if the requirement can be changed to reporting results back to Airbus as a batch (for the whole fleet) at 12 month intervals.

***EASA response: Disagreed***

***EASA is in favour to stick to the period of 90 days for the reporting of the inspection results in order to get a fast feedback of the fleet situation to determine the next required actions (if any).***

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

***Commenter 3: Delta Air Lines – Ivana Gonzalez – 02/07/2019***

***Comment # 3***

**References:**

- (A) Airbus Alert Operators Transmission (AOT) A52P013-19 Rev 00, dated 07 May 2019
- (B) EASA Proposed Airworthiness Directive: PAD No.: 19-103, dated 06 June 2019
- (C) Airbus Tech Request 80615942, Engineering Draft AOT A52P013-19 – DAL Comments
- (D) Airbus Tech Request 80636808, Engineering AOT A52P013-19 – DAL Clarification Request/Comments
- (E) Airbus A350 AMM Tasks A350-A52-11-68-00001-720A-A, A350-A52-12-68-00001-720A-A, and A350-A52-13-68-00001-720A-A
- (F) Airbus Tech Request 80615942, AOT A52P013-19 & AMM Differences Create Non-compliance Risk

1. Most Airbus Service Bulletins define the phrases “refer to” and “in accordance with”, and those definitions help airlines and authorities know what steps the airline has latitude to use other procedures without an AMOC. AOT A52P013-19 uses the phrases “refer to” and “in accordance with” in the work instructions, but the front of the AOT does not define those phrases. Airbus Tech Request 80636808 confirms that those standard definitions apply. Delta requests that EASA include the standard “refer to” and “in accordance with” definitions in the EASA AD.

2. Paragraph (4) of EASA PAD No.: 19-103 mandates reporting within 90 days of the inspection mandated in Paragraph (1) of EASA PAD No.: 19-103 whether or not there are any findings during this inspection of the girt bar fitting assemblies. Delta believes that the requirement to report results of both positive and no findings places an unnecessary burden, since negative findings are estimated to be low. Airbus estimates in Tech Request 80636808 that less than 25% of the total girt bar fitting assemblies inspected will be found stiff to rotate or stuck, and that less than 1% will result in replacement of the girt bar fitting assemblies. Therefore, Delta recommends to either not mandate reporting, or mandate the reporting of bad findings



only. Since the final fix will include a retrofit of the girt bar fittings, which should occur whether there are 1% or 5% failures, Delta would prefer that reporting not be mandated.

3. The A350 AMM chapters listed as part of Reference (E), contain procedures on how to remove/replace the girt bar assemblies. Delta observed that the AMM procedures are not the same as the AOT A52P013-19 procedures on how to remove/replace the girt bar. Once the AOT becomes AD mandated, then this area becomes AD related and operators are potentially at compliance risk if they change the girt bar per the AMM instead of per the AOT. Delta has raised this concern to Airbus via Tech Request 80615942. Airbus acknowledged the difference between the two documents and has agreed to revise the instructions in AMM to match the AOT. Per Airbus, this revision will be available Sept 19, 2019. Since this revision is expected to be later than the AD effective date, Delta requests that EASA include a paragraph stating that replacement of the girt bar fitting assemblies (due to found damage during routine maintenance) can be performed per the AMM, and that replacement per the AMM does not constitute a deviation and therefore no AMOC is required.

***EASA response: Partially agreed.***

***1. Disagreed. The AD states what actions are required in accordance with the AOT.***

***2. See our reply to comment #2***

***3. EASA expects that most of the findings will be fixed by grease application. The girt bar fitting replacement should be the last solution to avoid the operator to set the door inoperative. Consequently we expect very few cases of fitting replacement before the September AMM publication.***

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

#### ***Commenter 4: Lufthansa Technik AG – Andreas Uhl – 04/07/2019***

##### ***Comment # 4***

PAD paragraph (2) Corrective Action is referring to AOT A52P013-19 for all necessary rectification measures in case of inspection findings. For findings out of tolerance of (bush item 8) AOT paragraph 4.2.3 (1)(1.5) a replacement of the complete girt bar fitting becomes necessary. For this replacement paragraph 4.2.3 (1)(1.8) requests the removal of the Door Mat (MP - TASK A350-A-53-XX-XX-06001-520A-A) to enable the access to the girt bar fitting lower portion for cleaning (1.9) and Corrosion Preventive Compound reapplication through a manhole (1.11). I would like to clarify that these holes are not manholes, as only a hand, arm can fit in. The work via these holes on this lower portion has to be performed blind, as no direct view is given. Inspection of the work performed, is only possible by use of a mirror or videoscope. LHT assessed the lower fitting portions of all eight passenger doors and came to the conclusion, that all affected fittings can be directly reached from below via cargo hold, waste- and electronics compartment with no or



only minor access work required. Beside the complex access via the door mat removal and the restricted view on the work area, the mat reinstallation bears the risk of errors during the resealing process which may could lead to leakage in the floor structure assembly.

The described alternative access procedure has already been presented to Airbus SEES1 during a Webinar 11th of June 2019 and has been confirmed as a viable method.

Herewith LHT engineering would like to request EASA to grant this alternative access procedure as part of the final AD and would like Airbus to update the AOT accordingly.

***EASA response: Partially agreed. Very few cases of girt bar fitting replacement are expected. So at this stage, EASA does not expect in the immediate future that Airbus update the AOT; however, if the first set of inspection results demonstrates a different girt bar fitting replacement rate, the AOT will be revised.***

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

