

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-041-CN

[Published on 06 April 2022 and officially closed for comments on 04 May 2022]

Commenter 1: Lufthansa Technik – Paul König – 14 April 2022

Comment # 1

Concerning PAD-CN 22-041 we would like to inquire if the fact, that the relevant SBCs are not “mandatory” but “recommended”, has been taken into account when performing the new risk analysis.

EAD 2020-0236 and the related AOT A25N019-19 mandate on-wing pressure checks and, as an alternative to this, recommend to modify the slides i.a.w. the SBCs.

The endorsed FAA SAIB AIR-22-06 also just “recommends” accomplishment of the SBCs.

We would appreciate if you could clarify why it is not mandatory to perform the SBCs.

EASA response:

Following a revised risk assessment, EASA considered that the applicable SAFRAN SBs do not need to be mandatory. Nothing prevents operators to retain a repetitive inspection programme for slide reservoir pressure checks as part of their Maintenance Programme.

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

Commenter 2: British Airways – Dan Walpole – 25 April 2022

Comment # 2

Will EASA be fully cancelling this AD 2020-0236 or will EASA be changing the AD to read comply with FAA SAIB AIR-22-06. BAW would prefer the latter approach with a compliance statement from the regulator who issued the Type Certificate for this aircraft type.

EASA response:

There is no action ‘to comply with FAA SAIB AIR-22-06’, as it does not contain requirements, only recommendations. EASA is the regulator who issued the type certificate for this (Airbus A320 family) aircraft type. Nevertheless, EASA has coordinated with the FAA representing the State of Design for the slide TSO approvals, and both regulators agree the unsafe condition no longer justifies AD action.

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

Commenter 3: Ryanair – Alan Doyle – 04 May 2022
Comment # 3

Regarding EASA’s proposal to cancel the requirements of AD 2020-0236, Ryanair seeks additional clarification for the proposed AD cancellation. Considering there are likely to be un-modified slides in service at the time of AD cancellation, Ryanair has the following question:

While no longer a mandatory requirement, is it still recommended by EASA for operators to retain a repetitive inspection programme for un-modified slides? PAD 22-041-CN references FAA SAIB AIR-22-06, which makes no reference to any inspection recommendation. “

EASA response:

EASA took into consideration that there may be un-modified slides in service at the time of AD cancellation during the revised risk assessment. Nothing prevents operators to retain a repetitive inspection programme for slide reservoir pressure checks as part of their Maintenance Programme.

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

