

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2024-0077

[Published on 19 March 2024 and officially closed for comments on 16 April 2024]

Commenter 1: Pakistan International Airlines Corporation – Bakhat Azam Rush – 27/03/2024

Comment # 1

This refers Appendix-1, column# 2 (i.e. Time accumulated by the aeroplane on the effective date of this AD) of attached EASA AD 2024-0077.

In this case our understanding is that the Time accumulated by the aeroplane should be considered on the effective date of EASA AD 2016-0206 instead of current AD.

NOTE: If we consider time accumulated by aeroplane on the effective date of current AD then we may lose compliance threshold target for few aeroplanes and they may fall under overfly.

Kindly confirm our understanding OR clarify threshold mentioned on Appendix-1, Column-2 (i.e. Time accumulated by the aeroplane on the effective date of this AD)?

EASA response:

Comment agreed.

The final AD was corrected to clarify that the time accumulated by the aeroplane in Appendix 1, should be considered on 27 October 2016 [the effective date of EASA AD 2016-0206].

Commenter 2: Aegean Airlines S.A. – Antouanetta Iliopoulou – 01/04/2024

Comment # 2

While reviewing AD 2024-0077 we came across some concerns regarding the time requirements of the AD.



No credit is referenced for actions carried out in accordance with the instructions of AD 2016-0206, so we understand that affected aircraft should still be in compliance based on paragraphs (4), (5), (6) and (11) of AD 2024-0077.

However, there are cases of aircraft previously inspected iaw AD 2016-0206, for which the time requirements of AD 2024-0077 Appendix 1 cannot be complied with.

To be more specific, let us use as an example an A321 A/C aircraft that had accumulated 20 000 FC/28 000 FH on 27 Oct 2016 and based on AD 2016-0206 Appendix 1, the compliance time was “Within 5 000 FC or 10 000 FH after the effective date of this AD (i.e. 2016-0206), without exceeding 33 000 FC or 66 000 FH since aeroplane first flight”. Let us assume that this aircraft carried out all appropriate actions at 4 500 FC after the effective date of AD 2016-0206.

The same aircraft, based on AD 2024-0077 Appendix 1, has accumulated more than 30 000 FC/60 000 FH on the effective date of AD 2024-0077 (i.e. 02 Apr 2024) and thus the applicable compliance time should be “Within 3 000 FC or 6 000 FH after 27 October 2016 [the effective date of EASA AD 2016-0206], without exceeding 41 800 FC or 83 600 FH since aeroplane first flight”. Since as assumed above, this aircraft carried out any actions at 4 500 FC after the effective date of AD 2016-0206, the AD 2024-0077 time requirement is now exceeded.

Based on the above, and since the Compliance times of AD 2024-0077 Appendix 1 are based on AD 2016-0206 effective date, we believe that the time accumulated on the effective date of AD 2016-0206 should be taken into account and not on 02 Apr 2024.

Can you please review and provide your comments?

EASA response:

Comment agreed. See answer to comment 1.

Commenter 3: Titan Airways Limited – Garry Corcoran – 09/04/2024

Comment # 3

Para 11 gives credit for modification carried out on an aircraft in accordance with SB A320-23-1263 as required by Para 6:

“(11) Modification of an aeroplane as required by paragraph (6) of this AD, accomplished before the effective date of this AD, in accordance with the instructions of SB A320-53-1263 at Revision 01, Revision 02, Revision 03 or Revision 04, are acceptable to comply with the requirements of paragraph (6) of this AD for that aeroplane.”

Para 6 gives both SB A320-53-1240 or A320-53-1263 as modification requirements, 53-1240 is accomplished if no cracks are found and 53-1263 is accomplished if cracks are found:



“Modification:

(6) If, during the SDI as required by paragraph (4) of this AD, no damage is found, or cracks are found within the limits as defined in Airbus SB A320-53-1264, before next flight, modify the pressure panel above the LH and RH longitudinal beams in accordance with the instructions of Airbus SB A320-53-1240 at Revision 01 or SB A320-53-1263 at Revision 05, as applicable.”

I have five aircraft that were inspected iaw SB A320-53-1264 as mandated by the previous AD 2016-0206 with no cracks found, so all five were modified iaw SB A320-53-1240, however, all five aircraft were inspected and modified after 27th October 2016 meaning Para 10 of the subject AD cannot be used as credit.

“(10) Modification of an aeroplane accomplished before 27 October 2016 [the effective date of EASA AD 2016-0206] in accordance with the instructions of Airbus SB A320-53-1240 at original issue, or SB A320-53-1263 at original issue, as applicable, is acceptable to comply with the modification requirement of paragraph (6) of this AD for that aeroplane.”

As Para 11 only refers to modification by SB A320-53-1263, I am concerned how modification IAW SB A320-53-1240 comes into play (if at all?) Please can you advise if Para 11 should also refer to SB A320-53-1240 or if not do aircraft modified by that SB now require further inspection?

EASA response:

Paragraph (6) requires if no cracks are found modification in accordance with Airbus SB A320-53-1240 at Revision 01 or SB A320-53-1263 at Revision 05, as applicable.

Paragraph (10) then provides credit for Airbus SB A320-53-1240 at original issue or SB A320-53-1263 at original issue, if done prior to 27 October 2016 for paragraph (6).

This means paragraph (10) only excludes credit for the SB A320-53-1240 at original issue done AFTER 27 October 2016. This is due to the fact that, at that time, Revision 01 was already published and that the superseded AD 2016-0206 already required the Revision 01 of SB A320-53-1240.

