

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2024-0201

[Published on 21 October 2024 and officially closed for comments on 18 November 2024]

Commenter 1: Philippine Airlines – John David L Andrade – 25/10/2024

Comment # 1

We would like to request clarification regarding paragraph (2) of EASA AD 2024-0201.

- (2) Depending on the aeroplane configuration and cumulated FH or FC, as applicable, it is allowed to defer the initial inspection threshold as defined in paragraph (1) of this AD in accordance with the instructions of paragraph 5.1 of the AOT.

Paragraph 5.1 of AOT A57N024-24 allows a threshold extension of A321-200 aircraft of up to 6 months from the effective date of the AOT. The reckoning date is the effective date of the AOT.

However, the AD threshold for Table 1 Group 4 is 3 months from the effective date of the AD. The reckoning date is the effective date of the AD.



Table 1 – Compliance Time

	Thresholds (A or B, whichever occur later)	Intervals (Whichever occurs first)
Group 1 and Group 3	A) 51 200 flight hours (FH) or 25 600 flight cycles (FC) since first flight, whichever occurs first B) Within 3 months after the effective date of this AD	15 800 FH or 7 900 FC
Group 2	A) 41 200 FH or 9 600 FC since first flight, whichever occurs first B) Within 3 months after the effective date of this AD	12 400 FH or 2 900 FC
Group 4	A) 30 600 FH or 15 300 FC since first flight, whichever occurs first B) Within 3 months after the effective date of this AD	9 000 FH or 4 500 FC

Upon meeting the extension requirements of paragraph 5.1 of AOT A57N024-24, can we use the effective date of the AD as our reckoning date?

EASA response:

Comment noted.

The AD was revised to add Note 1 in the AD to provide clarification.

Commenter 2: HK Express – Yan Chow – 04/11/2024

Comment # 2

EASA AD 2024-0201 requires repetitive inspections of the affected area in accordance with the instructions of AOT A57N024-24. The instructions provided in AOT A57N024-24 and the enclosed advance copy should be classified as special detailed inspection (SDI) (ultrasonic inspection). However, the AD mentions the inspection as detail inspection (DET).

We would request EASA for the clarification of the inspection level.

EASA response:

Comment agreed.



The AD was revised to modify the inspection method.

Commenter 3: Lufthansa Technik AG – John Donegan – 22/10/2024

Comment # 3

LHT requests clarification regarding §(2) of AD 2024-0201, if the deferral in accordance with paragraph 5.1 of the AOT considers the effective date of the EASA AD, or the “effective date” of the previously published AOT.

LHT requests EASA to follow the standard case when calendar time limits are published, that the AD mandated compliance time will count from the effective date of the EASA AD, not an OEM document effective date.

EASA response:

See answer to comment 1.

Commenter 4: JUNEYAOAIR – Zhang Shuo – 15/11/2024

Comment #4

Reference:

/A/ EASA AD No.: 2024-0201

/B/ AOT-A57N024-24-00

Description:

As required by para.1 of Ref /A/, 3 months after 04 November 2024 (effective date of Ref /A/) can be used as a grace period. Meanwhile, the grace period provide in Ref /B/ is within 3 months from 21 Sep 2024 (effective date of Ref /B/), which is earlier than the grace period provided in Ref /A/.

Question:

If airlines use the grace period provided by Ref /A/ (3 months after 04 November 2024), would this constitute a violation of any laws or regulations (not compliance to requirements of the AD)?



EASA response:

See answer to comment 1.

