

EASA PAD No. 07 - 093
COMMENT RESPONSE DOCUMENT
[officially closed for comments on 4 July 2007]

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Applicability	The current wording causes problems where Aircraft have the modified pumps (per Eaton VSB 8410-28-05) installed by attrition as an alternative iaw the Aircraft IPC. It would be preferable to add clarification that the AD is not applicable to Aircraft having pumps modified per Eaton VSB 8410-28-05 installed. Also clarify at the end of the Compliance Section - last paragraph.	Steve Sells Airworthiness & Planning Manager Thomas Cook Airlines UK Ltd	19/06/2007	The Airbus SB A320-28-1159 is the controlling document hence this is what must be referred to here. It is recognised that SB A320-28-1159 references the Eaton VSB as the required action on the pumps. Hence if direct use of the VSB / IPC is acceptable to Airbus this should be addressed within the Airbus SB.
Compliance	Para C. - The timescales specified do not align with current PPH intervals of 6000 FH or 20 months. Whilst acknowledging that the figures are those quoted in SB A320-28-1159, this does present operators with difficulties with scheduling embodiments. This comments has also been passed to the Manufacturer. A note should be added at the end of the Compliance Section that only modified pumps can be installed after the compliance timescales.	Steve Sells Airworthiness & Planning Manager Thomas Cook Airlines UK Ltd	19/06/2007	Unfortunately, the risk assessment does not allow a timescale that is in line with the current MRBR timescales.
Compliance	Please be advised that the British Airways intent is to negate Compliance B by locking out the Centre Tank IAW Airbus AMM. The MMEL restriction only allows centre tank inop for a limited period (10days). Airbus has confirmed to BA that it will be acceptable to lock it out until the requirement of SB A320-28-1159 are met. Can a suitable statement be added to the AD allowing the MMEL restriction not to apply.	John Osborne Technical Engineer, British Airways	18/07/2007	The centre tank must be deactivated in accordance with the AMM task as specified. This ensures all necessary items are addressed and ongoing maintenance actions are defined.

				There is in fact no item in the MMEL for the deactivation of the centre tank. The use of the MMEL/MEL is therefore not an acceptable method to address the deactivation of the centre tank. Furthermore, the MMEL is not intended to authorise long term deactivation of inoperative components but only to provide for continued operation prior to performing corrective actions.
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