

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-110 [Published on 01 July 2014 and officially closed for comments on 29 July 2014]

Commenter 1: Lufthansa Technik AG – Ralk Bauer – 02/07/2014

Comment # 1

On behalf of operator GAF, Lufthansa Technik herewith addresses some comments regarding EASA PAD 14-110 and its effectivity for A319CJ aircraft.

During the A320 fatigue test campaign several fatigue issues have been detected. Fatigue and damage tolerance evaluation revealed that fatigue cracking of the respective structural elements may contribute to a catastrophic failure of the aircraft when operated beyond the standard A320 FAM Design Service Goal (DSG) of 48000FC / 60000FH. Accordingly, structural modifications for operation up to the new Extended Service Goal (ESG) of 60000FC/120000FH have been defined and mandated.

In principle, A319 CJ aircraft (Group 19-1C) can airframe-wise also be affected by these fatigue issues. However, an A319CJ DSG and ALS Part 2 LOV of 18000 FC / 77400 FH, their certified operational limit, does by far not allow operation up to a FC/FH range where the associated fatigue cracking occurs at all.

It is concluded that a PAD compliance time of 48000 FC / 96000 FH for accomplishment of SB 53-1268 respectively cannot be reached based on the certification basis of A319CJ aircraft. The same applies to all PADs/ADs covering fatigue related modifications or inspections with a compliance time beyond ALS Part 2 LOV.

For potential A319CJ life extension programs, which are currently not planned, and associated modifications, dedicated ADs and /or modification dependent ALS requirements will have to be issued. However, since those programs are not in place it is deemed not reasonable and technically unjustified to establish formal compliance with mandatory requirements which can certification-wise not be reached.

Lufthansa Technik concurs that the associated Service Bulletins are technically applicable to A319CJ aircraft and can be performed on operators discretion, however it is rejected to mandate these in anticipation of any possible future operational limit extension, which is not yet planned. The A320 fatigue test campaign also revealed fatigue issues which may occur beyond ESG, however they have not been addressed by ADs or SBs as operation beyond ESG is currently not subject to certification.

It is kindly requested to review the above conclusion, coordinate this topic between EASA and AIRBUS, eventually delete A319CJ aircraft (Post Mod 28162, 28238, 28342) from the PAD/AD applicability and to also apply this approach for future PAD/AD issues.

EASA response:

Comments understood, but not accepted. Even though EASA agrees that it may be unlikely that an A319CJ will reach or exceed the ESG, this is by no means impossible. Therefore, insufficient grounds exist to exclude these aeroplanes from the Applicability.

EASA confirms that it is not required to make an aeroplane candidate for ESG (that is at the operator's discretion), but if and when that option is chosen, this AD becomes a pre-requisite action.

It should also be clear that, even though the AD applies, no action is required on any aeroplane until the compliance time is about to expire. Upon reaching

the limit (FC or FH, whichever occurs first) the only and obvious alternative is invalidation of the C-of-A.
No changes have been made to the Final AD in response to this comment.

Commenter 2: American Airlines – Richard Castle – 03/07/2014

Comment # 2

Subject PAD is applicable to the following aircraft types of which American Airlines (US Airways) currently operates 295.

[Airbus A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232](#) aeroplanes, all manufacturer serial numbers.

However, the service document to address this proposed AD, Airbus SB A320-53-1268, is only available through the Airbus RFC / RMO process and since we have not purchased this SB, we are unable to comment on the technical content of it. American Airlines (US Airways) trusts that this service document will be converted to a standard SB prior to release of the final AD so that we and other affected carriers are able to comply with the instructions within the bulletin?

We also note that there is no terminating production modification listed in the applicability paragraph of the PAD, so we are unsure if Airbus SB A320-53-1268 is associated to a production modification that we would expect to see on future delivered aircraft? Again, if we had access to SB A320-53-1268 this question might become clearer to us.

EASA response:

Comments understood, but not accepted. See answers to Comment # 1 above. No changes have been made to the Final AD in response to this comment.

Commenter 3: British Airways Engineering Services – Oscar Chan – 23/07/2014

Comment # 3

[A] EASA PAD 14-110 refers to Airbus Service Bulletin (SB) A320-53-1268 extensively. The SB contains the details of the proposed mandatory actions. The Type Certificate Holder (TCH) has informed British Airways (BA) that it will only provide the SB for BA to review on commercial terms requiring BA to purchase the Extended Service Goal (ESG) package from the TCH.

BA has received the SB Summary from the TCH, but has not yet purchased the ESG package. Therefore BA is not in possession of all pertinent details regarding this SB. BA considers that the summary does provide additional modification details but does not provide sufficient information to complete a technical consideration. BA is therefore unable to provide the European Aviation Safety Agency (EASA) with detailed comments to this PAD as requested. As the majority of the world's fleet of affected aeroplanes are below the Design Service Goal (DSG), BA assumes that this situation will also be common to most other operators.

BA believes that potential for commercial gain is compromising the rule making assessment activity, and is hindering the level of scrutiny that would normally be associated with a PAD. BA is very concerned that safety oversight is being adversely affected by TCH commercial goals and considerations.

BA understands that there will be a number of TCH SBs required to support the aircraft up to and beyond DSG, each of which, BA presumes will be the subject of EASA PADs. BA suggests that if EASA wishes to receive informed industry comments to future PADs associated with ESG, EASA should make the information

available to industry without the current commercial incumbencies. This could be done by EASA providing details in the PAD (rather than referring to the TCH SB) or require the TCH to provide the associated airworthiness data without commercial ties or operator obligation.

BA does realise that the TCH wishes to provide the SB on commercial terms but to date manufacturers have only levied a charge on the associated kit price and not the airworthiness data.

[B] Additionally BA notes that no indication is made for aircraft equipped with sharklet installations (A319 and A320 post-mod 160001, and A321 post-mod 160021). In previous EASA ADs BA notes that for aircraft with sharklet installations the compliance thresholds have been significantly reduced depending on aeroplane configuration.

EASA response:

Comment [A] – Understood, but not accepted. See answers to Comment # 1 above.

Comment [B] – Compared to previous AD 2014-0081, at this time, EASA has received no information from Airbus that installation of sharklet influences the threshold for these specific structure parts.

No changes have been made to the Final AD in response to these comments.

Commenter 4: EasyJet (EZY) – Pawandeep Kalyan – 23/07/2014

Comment # 4

With regards to [EASA PAD 14-110], EZY would like to make the following comments:

- The applicability of the subject PAD is as follows

Applicability:	Airbus A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes, all manufacturer serial numbers.
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- However, the associated modification SB A320-53-1268 called up in the subject PAD (fwd pressure bulkhead modification at FR35) is not available for EZY to view. This is because EZY is not in the effectivity list within SB A320-53-1268.

- Embodiment of SB A320-53-1268 allows for the operator to operate a/c up to the new ESG limit. This is an optional and chargeable modification.

EASA REQUESTED ACTION:

EZY requests for EASA to review the discrepancies between the PAD applicability and associated SB A320-53-1268 effectivity prior to issuance of the AD.

EASA response:

Comments understood, but not accepted. See answers to Comment # 1 above. No changes have been made to the Final AD in response to this comment.