


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-131</p> <p>[Published on 18 August 2014 and officially closed for comments on 15 September 2014]</p>

Commenter 1: Deutsche Lufthansa and Lufthansa Technik AG – Stefan Spiesmacher – 29.08.2014

Comment # 1

1. concerning requirement (3): a statement that the accomplishment of the modification in accordance with Airbus SB A320-32-1407 Rev 01 (which contains the same instructions with regard to the modification or replacement of the actuators as Airbus SB A320-32-1390 Rev 03) is an alternative method to comply with this requirement would be most helpful for those operators who selected to completely modify an aircraft in case of findings during the inspections required by (2).
2. concerning requirement (10): it should read “(2) through (4)” instead of “(2) through (5)” when referring to the inspections. A section title like “MLG Door Actuator Modification” before requirement (5) and another one before requirement (11) could be helpful to structure the different subtopics covered by this PAD.
3. concerning the Referring Publications: Airbus SB A320-31-1414 should be added to the list of referring publications as it is subject of requirement (11) and (13).

EASA response:

1. **Comment not agreed – No single AD paragraph should be taken in isolation from other paragraphs. Paragraph (3) – which is a ‘retained’ action from a previous AD – requires replacement, but not necessarily by accomplishment of SB A320-32-1407. Paragraph (9) of the AD already makes clear that modification in accordance with Airbus SB A320-32-1407 is acceptable and under which conditions (i.e. both sides). No changes have been made to the Final AD in response to this comment.**
2. **Comment partially agreed. Paragraph (10) has been amended to make reference only to the repetitive inspections required by paragraph (2). Paragraph (3) contains the ‘corrective’ actions for findings during these inspections, while paragraph (4) only gives credit for past actions. If the inspections are ‘terminated’, that also terminates any ‘corrective’ actions, as well as (the need for) any previous credit.**
3. **Comment agreed. Reference to SB A320-31-1414 has been added.**

Commenter 2: United Airlines – Tariq Siddiquie – 12.09.2014

Comment # 2

References:

/A/ EASA PAD No. 14-131

/B/ Airbus Service Bulletin A32032-1407, Revision 1 dated July 3, 2014

/C/ GE Service Bulletin 114122-32-105, Revision 2 dated June 24, 2014

United Airlines Systems Engineering has reviewed the Ref /A/ PAD and offers the following comments:

The Ref /A/ PAD requires that operators, prior to the installation of the new or modified P/N 114122014 MLG door actuator, flush the affected hydraulic system in accordance with the instructions of the Ref /B/ Service Bulletin. United Airlines disagrees with this proposed action. Airbus instituted this requirement to flush the hydraulic system as it failed to recommend the removal, inspection and cleaning of the restrictors during the modification of the MLG Door Actuator to the P/N 114122014 configuration. United Airlines has opted to overhaul the MLG Door Actuators in addition to performing the modification as required by the Ref /B/ Service Bulletin. This overhaul requires that the restrictors (P/N 114122233 & 114122232) and transfer pipe be removed, inspected and cleaned. This procedure was subsequently added to the modification procedure as defined in the Ref /C/ Service Bulletin. Therefore, United Airlines is of the opinion that flushing the hydraulic system is not required as there is no contamination present in the restrictors or the transfer pipe.

EASA response:

Comment not agreed. It is suggested that the commenter applies for an AMOC to have the overhaul of the MLG Door Actuators recognised as an alternative to the flushing requirement. No changes have been made to the Final AD in response to this comment.

Commenter 3: ANA – Toshiki Nagase – 12.09.2014

Comment # 3

1. ANA requests to maintain para (8) as is, because testing performed with a new actuator tested in heavily contaminated hydraulic system did not show abnormal restriction/blockage.
2. Please express the time frame to issue a new AD in advance since ANA needs to procure materials to perform flushing of L/G system.

EASA response:

1. **Comment noted.**
2. **The Final AD becomes effective 14 days after issuance – this, and the fact that a PAD was issued to ‘announce’ the (intent of the) AD, is considered by EASA to be sufficient advance notice.**

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

Commenter 4: Air France – David Mazars – 12.09.2014

Comment # 4

General comment :

1. In case of in service failure and actuator replacement need (either SB 32-xxxx or xxxx) ground hydraulic cart may not be procurable in station. In order not to impact A/C dispatch, AMOC procedure should be proposed. Based on AIB safety review, it was determined that in case of pollution the fact to recycle 5 times

landing gear sequence would be sufficient to blow away possible particles that could prevent door operation. This conducted to FCOM procedure modification. So in case of actuator replacement the fact to operate 5 or more time doors using A/C system (door opening handle) should be sufficient to ensure that circuit is flushed and eliminate risk of free debris that could prevent actuator operation. Such process does not require hydraulic cart.

Paragrapher comments:

2. For simplicity reason, it would be necessary to merge paragraph 9 to 3 requirement to avoid the link between those paragraph.
3. The paragraph 7 does not take into account than A/C could be mixed with P/N 114122011/ 114122014 or 114122012 / 114122011. The terminating action for repetitive inspection is only when A/C is fitted on both side the MLG door actuator new standard.

4. Paragraph 10

A/C fitted on both side are not concerned by paragraph 2 to 6 (instead of " (2) to (5)" in PAD 14-131).

5. Paragraph 11

In SB A320-32-1407 Rev 01 page 2, AIB explain the requirement to cancel OEB 44 issue 4 (Operational procedure paragraph 1):

- SB A320-31-1414 accomplishment or A/C post MOD 153741
- SB A320-32-1407 accomplishment or A/C post MOD 153655

But in SB A320-31-1414 it is clearly stated that its application is the terminating action of OEB (cancellation), in this document there no reference to SB A320-32-1407 or MLG Door Actuator standard.

As per OEB 44 issue 4 and SB A320-32-1407 Rev01, the only requirement to cancel this procedure is the accomplishment of both SB.

==> SB A320-31-1414 may be revised to introduce SB A320-32-1407 Rev01 application as concurrent requirement to allow cancellation of operational procedure.

Please could you also review possibility to allow Airline to keep operational procedure on A/C already modified until the end of airline fleet modification. This would ease documentation management and also secure crew process with a unique operating process (avoid risk of confusion when crew operate several A/C with different std). Moreover fact to recycle 5 times gears may not have impact even if A/C is modified with new actuators.

(4) Operational/Maintenance Consequences

The operational consequence of this Service Bulletin is the modification of the Flight Crew Operating Manual (FCOM), the Flight Manual (FM) and the Master Minimum Equipment List (MMEL).

Accomplishment of this Service Bulletin will cancel the red OEB 40 (formerly OEB 203 up until 2011), the red OEB 43 (formerly OEB 208 up until 2011) and the red OEB 44 (formerly OEB 209 up until 2011).

For a full improvements description, refer to the Modification Operational Impact (MOI) No. 153741.

6. SB A320-31-1414 is missing in AD list of references publication.

EASA response:

1. **Comment noted.** It is suggested that the commenter applies for an AMOC to have their alternative method recognised as an alternative to the flushing requirement.
2. **Comment not agreed.** See also the EASA answer to Comment #1, point 1.
3. **Comment not agreed.** Paragraphs (5) and (6) clearly state to “replace each MLG actuator”. As long as that has not been done on an aircraft, that aircraft cannot be recorded as having been modified as required by paragraph (5) or (6) of this AD.

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

4. **Comment partially agreed.** Adding references to paragraphs (5) and (6) is redundant, since those §§ require SB A320-32-1407 – please note all AD actions are “Required as indicated, unless accomplished previously”. See also the EASA answer to Comment #1, point 2.
5. **Comment agreed.** Paragraph (11) has been amended to state that “following modification [of an aeroplane], TR 437 (if inserted) may be removed from the AFM of that aeroplane”.
6. **Comment agreed.** Reference to SB A320-31-1414 has been added.

Commenter 5: Syrian Arab Airlines – Ayman ZAKARIA – 15.09.2014
Comment # 5

Please be advised that on our A320 installed the following equipment:

1. MLG door actuator P/N 114122011
2. FWC P/N 350E053020909 (H2F5)

Please advise if PAD NO :14-131 is applicable for our A320 and if it need to modify MLG actuator and FWC .

EASA response:

Comment noted. The AD Applicability is stated as “all” MSN.

1. **Regarding the MLG Actuator, P/N 114122011 is listed in Table 1 "Affected MLG door actuator P/Ns" and as mentioned in paragraph (6) of the AD, it must be replaced with an actuator P/N 114122014 in accordance with Airbus SB A320-32-1407, or to be modified in accordance with GE SB 114122-32-105. No changes have been made to the Final AD in response to this comment.**
2. **Regarding the FWC, P/N 350E053020909 (H2F5) is listed in Table 2 “FWC P/N No longer to be installed” so this P/N (350E053020909) cannot be installed on aircraft having a FWC P/N 350E053021212 (H2F7) installed, nor on an aircraft having a FWC P/N not listed in Table 2. As the commenter’s aircraft has H2F5 installed, no action is required for the FWC on that aircraft. The Final AD has been amended to make clear that, for aeroplanes that still have a P/N FWC installed as listed in Table 2, the prohibition to install (i.e. replace with the same P/N) does not apply.**