



COMMENT RESPONSE DOCUMENT

EASA PAD No. 14-144R1

[Published on 02 November 2015 and officially closed for comments on 30 November 2015]

Commenter 1: United Airlines – Neil Sorensen – 19/11/2015

Comment # 1

After review of the subject PAD, United Airlines has the following comments:

1. The PAD Reason paragraph states that the corrective action or terminating action per SB A320-53-1032 or A320-53-1031 may affect the accomplishment of SB A320-53-1274. However there is little to no explanation of the consequences for accomplishing the optional terminating A320-53-1031 (for MSN 0179 and higher) prior to accomplishing the repairs or modification per A320-53-1277 or A320-53-1274. Considering the compliance time for A320-53-1032/-1031 is much sooner than A320-53-1274/1277, we would like to understand how much additional work is necessary if SB A320-53-1031 is accomplished for MSN 0179 and higher. Paragraph (9) of the PAD states that the additional work is expected to be incorporated at the next revision of A320-53-1274. Without being able to review unpublished instructions, it is unclear if and when to comply with Paragraph (4) – A320-53-1031. Will the “additional work” of next revision of A320-53-1274 have a prerequisite to accomplish A320-53-1031? If not, will the “additional work” constitute terminating action for Paragraph (1)?
2. Regarding Note 2 in Paragraph (9) of the PAD, the additional work for MSN 0179 and higher is expected at the next revision of A320-53-1274. This seems to imply that A320-53-1274 R02 will be effective for all MSN's 0179 and higher. However, per Airbus OIT 14-0040 this SB is managed by Request for Change/Retrofit Modification Offer (RFC/RMO) and is understood that A320-53-1274 will not incorporate any operator's MSN without a purchase order. Please clarify the Paragraph (9) Note 2 if this is not the case.

EASA response:

PAD has been revised incorporating reference to latest SB revision.

Comment # 2

Please be informed that with the actual published SB revisions of SB's A320-53-1277 Rev.00 and A320-53-1274 Rev.01 the inspections requirements before modification can't be fulfilled. The modification area and the described inspection area does not match. Additional information in form of a



Technical Disposition are required that describes the correct area that have to be inspected by SB A320-53-1277 and to fulfill the requirements of PAD 14-144 R1.

Due to reason described above and from my point of view the PAD 14-144R1 should require the next announced revisions of these both SB. With the expectation that all for inspection/modification required, information will be incorporated with the next revision

EASA response:

PAD has been revised incorporating reference to latest SB revision.

