


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 14-144 [Published on 09 October 2014 and officially closed for comments on 06 November 2014]</p>

Commenter 1: Lufthansa Technik AG – Vincent Bouchet – 09/10/2014

Comment # 1

- (a) *Requirement (1) of PAD 14-144:* As Airbus delayed the issuance of the SB for almost two years, every A/C from DLH fleet which were close to DSG and undergoing their last Heavy Maintenance Visit prior to DSG were inspected acc. to SB A320-53-1277. Unfortunately the list of A/C listed in the table 1 does not reflect the delay for issuance of the SB. If the AD would be issued as it following **A/C should be grounded immediately** as they are already above DSG and did not have SB A320-53-1274 embodied due to the mentioned delay: MSN 071, MSN 093 and MSN 086.
- For the reason described above DLH/LHT request a revision of the table which take into consideration every A/Cs which have already undergone their last Heavy Maintenance Visit prior to DSG and on which SB A320-53-1277 has been performed. This will allow operators to not unnecessary impact their operation with generation of ground time for embodiment of the SB A320-53-1274.
- Regarding DLH/LHT remarks following A/C must have as compliance time 54.000FC and 108.000FH:
 MSN 069, MSN 070, MSN 071, MSN 072, MSN 078, MSN 083, MSN 086, MSN 093, MSN 104, MSN 161 and MSN 401.
- (b) *Requirement (2) of PAD 14-144:* SB A320-53-1274 have already 2 configurations. Config 01 is for A/C MSN up to 178 incl, and Config. 02 is for A/C starting with MSN 0179. Acc. figure A-GBCBA Sheet 1, 2 and 3 accomplishment of the cold working as described in SB A320-53-1031 is already part of the SB A320-53-1274. For this reason requirement (2) is obsolete.

EASA response:

- (a) **Comment agreed: After review with Airbus, EASA concurs with LHT comments. PAD has been revised accordingly.**
- (b) **Comment not agreed: This requirement (2) has been inserted in the AD to ensure that SB A320-53-1031 defined as concurrent requirement of SB A320-53-1274 for MSN below 179 is done and that for MSN above 179, all necessary actions are performed pending SB A320-53-1274 next revision. No changes have been made to the revised PAD in response to this comment.**

Commenter 2: Air France – Odon Ludovic Mbara – 14/10/2014

Comment # 2

AFR Fleet Status: All AFR Fleet concerned (129 A/C)

Compliance (1): From MSN 0069, 0070, 0072 and 0401: Modification to be performed before exceeding 54 000 FC or 108 000 FH whichever occurs first since A/C 1st Flight:

5 AFR airplane concerned therefore, they did not operate above the DSG 48000FC / 60000FH.

For all other airplanes (124 A/C), Modification to be done before exceeding 48000FC or 96000FH whichever occurs first since A/C 1st Flight:

124 AFR airplane concerned, the decision to operate above the DSG will be taken case by case during the last L3 check (18 YR).

Compliance (2): The SB A320-53-1031 has been embodied on MSN 0115 on 11 Sept 1999 through AEO 20-53-0087 then MSN 115 complies with the AD requirement. For the remaining AFR airplane, contact will be taken with AIB for further instructions.

Question: **Why Airplane A321 series are not concerned by this AD or SB?**

EASA response:

Comment noted: see EASA response to Comment #1; Airbus A321 models are not affected because these models have no overwing escape door Type III exits. No changes have been made to the revised PAD in response to this comment.

Commenter 3: easyJet – Andrew Knight – 16/10/2014

Comment # 3

EZY are unable to assess the PAD as the associated SB is only available by procurement from Airbus.

EASA response:

Comment noted: Out of scope of CRD. EASA suggest EZY to contact Airbus to get the SB. No changes have been made to the revised PAD in response to this comment.