

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 14-144R2

[Published on 22 June 2017 and officially closed for comments on 20 July 2017]

**Commenter 1: United Airlines – Neil Sorensen – 03/07/2017**

### Comment # 1

A). Para (5): Please elaborate why there is an 8,000 FC window of embodiment. Operators would like the flexibility to accomplish the inspection and modification sooner than required, in order to accomplish this at a convenient heavy maintenance opportunity and reduce the chance of damage findings. We would like to request this as a traditional inspection and modification; a compliance time before exceeding 48,000 total FC without a window of embodiment. Also, what are the consequences for previously incorporating the inspection and modification before 40,000 total FC?

B) Para (6) and (7): SB Subtask 531277-832-201-001 (Conf 1 & 2 – Area A) does not agree with the language for contacting Airbus on crack findings. The subtask step (c).2 provides instructions for “more than one crack”, however this situation is also given in step (c).3.b. I believe the SB has a typo in Subtask 531277-832-201-001 where step (c).2 instructions should be valid with no crack findings, in lieu of “more than one crack”. See Figure A-GFAAA – Sheet 1 Flowchart for comparison. Please consider noting this typo in the AD or otherwise wait for a revised SB 53-1277.

C) Para (9) and (11): These two paragraphs are confusing when comparing the ADDITIONAL WORK section of SB 53-1277 R01. Para (9) aligns with the compliance times of the ADDITIONAL WORK, however the SB ADDITIONAL WORK states to Contact Airbus for detailed instructions. Whereas Para (9) provide instruction to accomplish Para (5).

Para (11) states to contact Airbus for instructions for aircraft modified per SB 53-1274 but was not concurrently inspection per SB 53-1277 R01. However, SB 53-1277 R01 states there is no more ADDITIONAL WORK for aircraft that have accomplished SB 53-1274.

Please clarify how Para (9) and (11) relate to SB 53-1277 R01 ADDITIONAL WORK section. It is preferred not to have any “contact Airbus” instructions for situations not related to aircraft damage.

D) Ref. Publications: Please add SB A320-53-1274 R03 dated June 9, 2017 to the reference list as this is now available. Note that SB 53-1274 is managed by Request for Change / Retrofit Modification Offer (RFC / RMO) and does not yet have United effectivity so we cannot comment on this modification.

### EASA response:

**1A) Comment not agreed: The benefit of the MSB is 20 000 FC. In order to achieve ESG limit of 60 000 FC, 40 000 FC has been defined. It should be noted that the modification is required for aeroplane candidate for ESG operation. No action is required for aeroplane in DSG. As of today, AIRBUS**



*has not defined any standard solution/appropriate maintenance action in the case of an embodiment of SB 53-1274 prior to 40 000 FC. No changes have been made to the Final AD in response to this comment*

*Specific deviations can be managed on a case-by-case basis. No changes have been made to the Final AD in response to this comment*

*1B) Comment agreed. SB A320-53-1277 R02 corrects the typo error. Final AD has been updated accordingly*

*1C) Comment not agreed: Paragraph 9 of the PAD (paragraph 11 of the final AD) is for aeroplanes that have been inspected and not modified by SB A320-53-1274 (modification SB), where as paragraph 11 (13) is for aeroplanes that have been modified without being prior inspected with an adequate level of inspection. The request to contact Airbus at paragraph 11 (13) is to address the low risk probability that modification was done with no inspection. For aeroplanes in paragraph 9 (11) applicability, Airbus provided evidence that all aeroplanes were under their control. No changes have been made to the Final AD in response to this comment.*

*1D) Comment agreed. Final AD has been updated accordingly*

## **Commenter 2: Cathay Pacific Airways – Jimmy Cheng – 05/07/2017**

### **Comment # 2**

A) CPA would like to request for the effective date to be 30 days in lieu of 14 days in general to provide sufficient time for operators to take appropriate action. CPA acknowledges EASA's previous response, mentioning that based on the PAD issuance, operators have adequate time between PAD issuance date to the effective date of the actual AD for preparation. However, from experience, PAD no doubt is an alert for operators, but in reality, this cannot be accounted as "time given" for operators to prepare due to:

- i. The requirements of the actual AD can differ from the PAD, which means a proper review of the AD would still be required when released. ALL necessary documents have to be issued/reissued to reflect these new AD requirements.
- ii. There are cases where the AD mandated SB are not issued yet at the time of PAD or even AD effective date. For these similar cases, operators do not have anything to prepare with.
- iii. Some AD do not have PAD for consultation in advance
- iv. Sufficient time should be provided based on the fact that AD in general are becoming more complex, and operator would appreciate that sufficient time is provided in order to process these Airworthiness requirements.

Therefore please can EASA consider extending the standard of 14 days to 30 days.



- B) For SB-A320-53-1274, this SB is not available and requires RFP. For such SB, CPA believe that this should not be part of the AD since the actual SB is not available for operators.
- C) Alternatively, SB-A320-53-1274 should not be chargeable should be made available, since Paragraph 7 requires operator to implement this modification if a crack is identified that have exceeded the limits from SB-A320-53-1277 REV 01.
- D) For the inspection per SB-A320-53-1277 and modification SB-A320-53-1274, these tasks are not due until after DSG, therefore CPA believe these tasks do not need to be AD mandated as they should be captured during the DSG exercise, for which when operators intend to continue operating the aircrafts.

**EASA response:**

**2A) Comment not agreed. As a general comment, not limited to this AD, extending the interval to 30 days would require a consistent reduction of the compliance time. To be also noted that the 14 days interval is consistent with the issuance interval of the bi-weekly report on the AD publishing tool**

**2B and 2C) Comment noted. Operation of an aeroplane above 48 000 FC (ESG) is an option. Airbus will provide SB upon request. EASA is not responsible for commercial aspects.**

**2D) Comment not agreed. If not required by an AD, inspections and modification instructions could be modified without EASA approval.**

**No changes have been made to the Final AD in response to this comments**

**Commenter 3: easyJet – Andrew Knight – 11/07/2017**

**Comment # 3**

I have been reviewing PAD 14-144R2 and have an issue with the way it is currently written.

Under the applicability paragraph, it states it is applicable to numerous A319 and A320 types and all manufacturers serial numbers:

**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, A320-231, A320-232 and A320-233 aeroplanes, all manufacturer serial numbers (MSN).



When I get to the Required Action and Compliance Time section, paragraph (1) lists a few limited aircraft types and MSN's for the repetitive inspections:

**Repetitive Inspections:**

- (1) For A320-211, A320-212 and A320-231 aeroplanes, all MSN up to 0178 inclusive, except aeroplanes on which Airbus mod 21346 was embodied in production, or Airbus SB A320-53-1031 was embodied in service: Before exceeding 24 800 flight cycles (FC) since aeroplane first flight, or within 3 500 FC after 25 May 2002 [the effective date of DGAC France AD 2002-259] whichever occurs later, without exceeding 30 000 FC since aeroplane first flight, and, thereafter, at intervals not exceeding the values as specified in Airbus SB A320-53-1032 Revision (Rev.) 02, accomplish a detailed visual inspection (DVI) around the fastener holes in accordance with the instructions of Airbus SB A320-53-1032 Rev. 02.

On the subsequent paragraphs (2) to (11) there is no statement to say which ones are applicable to the rest of the MSN's as listed in the applicability paragraph.

I would guess that paragraph (5) onwards, is relevant to MSN 0179 (inclusive) and subsequent?

This requires clarifying to prevent any issues with compliance applicability.

**EASA response:**

***Comment not agreed: unless otherwise stated in the AD, each paragraph is applicable to all aircraft affected by the AD. Consequently, paragraph (5) is applicable to all aircraft affected (including those having MSN up to 0178 inclusive).***

***As an example, paragraph (1) is clearly identified as applicable to a limited range of aeroplanes; paragraph (2), requiring a corrective action for a discrepancy identified during the inspection required by paragraph (1), is hence not applicable to aeroplanes not included in the range identified in paragraph (1).***

***The above has been the EASA standard since long time.***

***No changes have been made to the Final AD in response to this comment.***

