

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-001 [Published on 09 January 2015 and officially closed for comments on 06 February 2015]

Commenter 1: Willis Lease Finance Corporation – Michael Coyle – 10/01/2015

Comment # 1

My comment deals with the terminating action of this PAD. Nowhere in the required actions section does it give word of what to do if during a DET a “bright” aft engine mount retainer is found. Would any further action be required? For example if during a DET inspection IAW AOT A71N001-12 R1; No dull finish, no cracks and no failed retainers were found. Would this constitute a terminating action for PAD 15-001?

EASA response:

Comment not agreed. The commenter possibly confuses the previous AD 2013-0050, which required only to identify (and to remove from service) retainers with a dull finish – as outlined in the Reason. This new AD requires removal from service of ‘dull’ retainers [retained actions in §§ (1) through (5)], and requires repetitive inspections of all ‘bright’ (the only remaining) retainers and replacement of retainers, if found damaged, cracked or broken.

Paragraph (9) of the AD clearly indicates that, at this time, replacement is not terminating action.

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

Commenter 2: Comlux Malta Ltd. – Raul Heras – 12/01/2015

Comment # 2

With respect to EASA PAD 15-001, in Table 1 of paragraph (6) for inspection threshold, shouldn't there be included a compliance time of “12 months since last compliance of SB A320-71-1060”?

EASA response:

Comment understood, but not agreed. Any action done i.a.w. Airbus SB A320-71-1060 before the effective date of the Final AD would have been (by definition) a ‘voluntary’ action. The AD clearly indicates (RACT section, opening statement) that actions are ‘Required as indicated, unless accomplished previously’. This means that an operator can take credit for previous action(s). If that is done (taking credit for a voluntary action is not required by the AD), the next inspection can be deferred until 12 months (interval as specified in § 6) after the last inspection.

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

Commenter 3: Lufthansa Technik AG – Florian Weinz – 14/01/2015

Comment # 3

I would like to provide the following comment regarding PAD No: 15-001. Accomplishment of the DET per SBC RA32071-160 is one of the two options to fulfill the AD requirements every 12 months. As the SBC was already released on September 18, 2014, the AD Compliance Time (Table 1) should reflect the case, that the first inspection was already done between September 18, 2014 and the effective date of the AD. The same applies for Airbus SB A320-71-1060.

Please see proposal for Table 1 update below (marked **red**):

A	Within 12 months since Airbus date of manufacture of the aeroplane
B	Within 12 months after installation of new retainers
C	Within 9 months after the effective date of this AD
D	Within 12 months after inspection per SBC RA32071-160 or SB A320-71-1060

From my understanding, this case is not yet reflected in the AD.

EASA response:

Comment understood, but not agreed. See answer to Comment #2 above. The principles outlined in that EASA answer for the Airbus SB are equally valid for the Goodrich SB.

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