



COMMENT RESPONSE DOCUMENT

EASA PAD No. 15-051R1

[Published on 28 July 2016 and officially closed for comments on 25 August 2016]

Commenter 1: Cathay Pacific – Hyphen Choi – 13/08/2016

Comment # 1

A) The PAD proposes the effective date is 14 days after the AD issue date, please consider to extend it to 30 days giving us enough time to setup the documentations (3 SB's: SB-A320-53-1264, SB-A320-53-1240, SB-A320-53-1263), settle the planning and inventory actions.

B) For the differentiating the SB-A320-53-1263 Configuration, CPA / HDA have no way to determine the installed pressure plate P/N on the aircrafts. The only way of AD compliance is we trust Airbus is well recognised the a/c production configuration, and we will perform the SB-A320-53-1263 using the configuration as suggested by Airbus in the SB. In case of configuration deviation, our MRO will pick it up during the SB embodiment and report to Airbus accordingly.

C) Based on PAD Appendix 1 we have the following comment:

- Refer the affected aeroplanes below, it is confused that the presentation of “All”, “except”, “Pre mod 151574”. We believe “Pre mod 151574” is disconnected with “except” and we should not read “except pre mod 151574”.



EASA PAD No.: 15-051R1

Appendix 1 - Pressure Panel Inspection / Modification Threshold

Affected aeroplanes	Time accumulated by the aeroplane on the effective date of this AD (FC or flight hours (FH), whichever occurs first since aeroplane first flight)	Compliance time (FC or FH, whichever occurs first)
All, except A318 Elite, A319CJ, and A320 and A319 post SB 57-1193 and pre Airbus Mod 151574	Less than 12 000 FC or 24 000 FH	A: Before accumulating 12 000 FC or 24 000 FH since aeroplane first flight, or B: Within 5 000 FC or 10 000 FH after the effective date of this AD. whichever occurs later, A or B.
	12 000 FC or 24 000 FH or more, but less than 30 000 FC or 60 000 FH	Within 5 000 FC or 10 000 FH after the effective date of this AD, without exceeding 33 000 FC or 66 000 FH since aeroplane first flight
	30 000 FC or 60 000 FH or more, but less than 40 000 FC or 80 000 FH	Within 3 000 FC or 6 000 FH after the effective date of this AD, without exceeding 41 800 FC or 83 600 FH since aeroplane first flight
	40 000 FC or 80 000 FH or more, but less than 44 000 FC or 88 000 FH	Within 1 800 FC or 3 600 FH after the effective date of this AD, without exceeding 44 600 FC or 89 200 FH since aeroplane first flight
	44 000 FC or 88 000 FH or more	Within 600 FC or 1 200 FH after the effective date of this AD

D) For EASA info, based on our interpretation on PAD we have the compliance threshold as shown below. EASA please comment if disagree.
Note: No sharklet mod (SB 57-1193) has been introduced in our fleet.

As of 13 Aug 2016

	Serial	MSN	Acquired	FH-TSN	CY-TSN	Mod 151574	PAD Applicable	PAD Compliance Threshold
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A320	B-HSD	0756	16-02-98	47095:49	24493	Not Done	Yes	Within 1 300 FC or 2 600 FH after the effective date of this AD, without exceeding 30 700 FC or 61 400 FH since aeroplane first flight*
	B-HSE	0784	06-03-98	46371:05	24137	Not Done	Yes	
	B-HSG	0812	22-06-98	44942:23	25067	Not Done	Yes	
	B-HSI	0930	29-01-99	44808:09	23651	Not Done	Yes	
	B-HSJ	1253	29-06-00	42196:17	22466	Not Done	Yes	Within 3 300 FC or 6 600 FH after the effective date of this AD, without exceeding 25 300 FC or 50 600 FH since aeroplane first flight*
	B-HSK	1721	07-03-02	38570:04	20570	Not Done	Yes	
	B-HSL	2229	09-07-07	33025:50	17526	Not Done	Yes	
	B-HSM	2238	13-07-04	33162:30	17366	Not Done	Yes	
	B-HSN	2428	29-04-05	31182:35	16550	Not Done	Yes	
	B-HSO	4023	15-08-09	18116:06	9446	Not Done	Yes	
	B-HSP	4247	01-03-10	17852:18	9310	Not Done	Yes	
	B-HSQ	5024	24-01-12	10046:58	6954	Done	No	
	B-HSR	5030	26-01-12	9665:49	6538	Done	No	
	B-HST	5362	28-10-12	8890:28	6064	Done	No	
	B-HSU	5429	03-12-12	8685:28	5963	Done	No	
A321	B-HTD	0993	01-04-99	45733:13	22511	Not Done	Yes	Within 5 000 FC or 10 000 FH after the effective date of this AD, without exceeding 33 000 FC or 66 000 FH since aeroplane first flight
	B-HTE	1024	04-06-99	44606:03	22026	Not Done	Yes	
	B-HTF	0633	24-03-97	53448:17	24572	Not Done	Yes	
	B-HTG	1695	15-03-02	38909:54	18944	Not Done	Yes	
	B-HTH	1984	24-09-03	35576:38	17441	Not Done	Yes	
	B-HTI	2021	22-10-03	35202:36	17320	Not Done	Yes	
	B-HTJ	3369	09-01-08	32247:43	14457	Not Done	Yes	
	B-HTK	3669	01-10-08	30252:56	13308	Not Done	Yes	

EASA response:

A) Comment not agreed. Extending the interval to 30 days would require a consistent reduction of the compliance time. Furthermore, the AD does not mandate any action on the effective date of the AD itself, so there is no reason to have all the planning and inventory actions, as also any other document required to



comply with the AD, completed / issued on the effective date of the AD. 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. No changes have been made to the Final AD in response to this comment.

B) Comment noted. No changes have been made to the Final AD in response to this comment.

C) The Ad is not applicable to aeroplane post mod 151574, as stated in the Applicability. The Appendix 1 has been modified to increase its readability, and removing unnecessary information that may lead to confusion

D) For A320 pre SB 57-1193, applicable requirements are included in the first group of Appendix 1. Same requirement applies for any A321 affected by this AD. Your interpretation is wrong for your A320 as soon as you declared these MSN with no sharklet: for MSN with FC above 12000, compliance time is "Within 5 000 FC or 10 000 FH after the effective date of this AD, without exceeding 33 000 FC or 66 000 FH since aeroplane first flight"; for both MSN 4023 and 4247 it is: "whichever occurs later, A or B. A: Before accumulating 12 000 FC or 24 000 FH since aeroplane first flight, or B: Within 5 000 FC or 10 000 FH after the effective date of this AD". No changes have been made to the Final AD in response to this comment.

Commenter 2: ALL NIPPON AIRWAYS – Hideyuki Kato – 15/08/2016

Comment # 2

A) As threshold is too short for the inspection, it is very impact to plan the revenue flight schedule for hi-cycled airplanes.

B) The purpose of the inspection is to avoid extending the crack. If so, these threshold's are very short. ANA believes that threshold should be one year enough for hi-cycled airplanes to inspect under our experience.

C) Planning of the inspection at MRO, the coordination is very hard work for hi-cycled airplane.

D) In addition, ANA would like to comment that there is not available modification/Repair Kit of SB A320-53-1263 in AIRBUS Stocks.

If damage is found, the aircraft should be AOG situation due to lack of the parts (lead time 200 days).

Therefore, this AD should be issued after available of the modification/Repair Kit of SB A320-53-1263.

EASA response:

A) Comment noted

B) Comment not agreed. Available data is not supporting a compliance of one year (based on average aeroplane utilization) for any aeroplane, whatever the accumulated FH/FC. The required compliance times are scaled, based on aircraft FC/FH, to reduce to the minimum the impact on operators.

C) Comment noted

D) Comment noted. Airbus has confirmed availability of kits.

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



Commenter 3: United Airlines – Neil Sorensen – 23/08/2016**Comment # 3**

Airbus SB A320-53-1240 Rev 01, as required by PAD Paragraph (5), contains updated longer length fasteners EN6115K3A8 in the work instructions. However, SB A320-53-1240 R01 Figures were not revised to reflect this change; the figures specify EN6115K3A7 instead (as previously specified in SB A320-53-1240 R00). Please add note in the AD for this discrepancy.

EASA response:

SB instructions list the correct fasteners to be installed. The change has not been done on the figures that have to be considered for information only.

Airbus confirms that these figures will be updated at next SB revision.

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

Commenter 4: Lufthansa Technik – Dennis Geipel – 24/08/2016**Comment # 4**

A) PAD Par. (4) states “Within the thresholds indicated in Appendix 1 of this AD, as applicable, accomplish an SDI of the pressure panel above the LH and RH longitudinal beams in accordance with the instructions of Airbus SB A320-53-1264 at Revision 01.”

Neither in this paragraph, nor in any other Paragraph of this PAD, the SDI as per SB A320-53-1264 at Original issue is accepted to comply with the requirements of this AD. This means, additional work would be mandated by Par (4) for A/C that have been inspected by SB A320-53-1264 Original issue.

As SB Revision 01 lists “No additional work is required by this revision for aircraft modified by any previous issue.”, we would like to propose adding another Paragraph:

“Inspections accomplished before the effective date of this AD in accordance with the instructions of Airbus SB A320-53-1264 at original issue are acceptable to comply with the inspection requirements of Par. (4) of this AD. After the effective date of this AD, inspections must be accomplished in accordance with the instructions of Airbus SB A320-53-1264 at Revision 01.”



B) PAD Par. (5) states “If, during the SDI as required by paragraph (4) of this AD, no damage is found, or cracks are found within the limits as defined in Airbus SB A320-53-1264, before next flight, modify the pressure panel above the LH and RH longitudinal beams in accordance with the instructions of Airbus SB A320-53-1240 at Revision 01 or SB A320-53-1263 at Revision 01, as applicable.”

This only applies to holes/ areas that haven’t been repaired in accordance with SB A320-53-1030 (or by different repair instructions received from Airbus). To account for A/C that show repair iaw SB A320-53-1030 (or mixed condition of areas repaired through SB A320-53-1030 and areas not yet repaired), we would like to propose Par. (5) Update, adding a Note:

“Note: If areas have been repaired through Service Bulletin No. A320-53-1030 or through Airbus instructions covered by Airbus RDAS, accomplish the relevant steps of SB A320-53-1264 and accomplish the instructions as received from Airbus (overriding SB A320-53-1240 and/or A320-53-1263 instructions).”

Please note the text “overriding SB A320-53-1240 and/or A320-53-1263 instructions” is to our mind important because the received RDAS will then demonstrate compliance with the modification requirements of this AD, without having embodied SB A320-53-1240 and/or A320-53-1263 (per SB A320-53-1264 instructions).

C) PAD Par. (7) states “Modification of an aeroplane as required by paragraph (5) of this AD or, prior to the effective date of this AD, in accordance with the instructions of Airbus SB A320-53-1240 at original issue or SB A320-53-1263 at original issue, as applicable, or in accordance with Airbus approved instructions that identify the repair as technically equivalent to the accomplishment of Airbus SB A320-53-1240 or SB A320-53-1263, as applicable, constitutes terminating action for the repetitive inspections required by paragraph (1) of this AD for that aeroplane.”

We would like to propose adding another phrase, to make clear that modifications carried out before effective date of this AD, at SB Original issues, are acceptable to substitute PAD Par. (5) instructions:

“Modification of an aeroplane prior to the effective date of this AD, in accordance with the instructions of Airbus SB A320-53-1240 at original issue or SB A320-53-1263 at original issue, as applicable, or in accordance with Airbus approved instructions, as applicable, are acceptable to comply with the modification requirements of this AD.”

EASA response:

A) Comment agreed. AD has been updated accordingly.

B) Comment noted. It is obvious that for holes that are repaired with approved instructions, SB 53-1240 or 53-1263 are not done. Compliance to the AD is ensured as soon as the specific repair instructions are in line with paragraph (9) of this AD (paragraph (7) of the PAD). No changes have been made to the Final AD in response to this comment

C) Comment agreed. AD has been updated accordingly.



Commenter 5: Air France – Hervé Gendreau – 24/08/2016**Comment # 5**

Following PAD 15-051 R0 issue date 28 Apr 2015 several operators had posted observations and questions about PAD issue, Unfortunately when Rev 01 has published on 28 July 2016 none observations have been taken into account!

The first question is:

What is operator's interest if they spend time to comments the PAD and their inputs are not valued?

A) could you review some significant questions already sent to avoid fleet impact

- Repetitive inspection for the A/C close to the DSG (without defect found)
- Perform inspection and postpone the CW definitive repair at the next C check
- To perform the repair only on the side found cracked and postpone other side at the next C check

B) in the appendix 1 of PAD 15-051 R1 in the chapter applicability

As shown in the picture below

For AFR fleet it means that there are no aircraft concerned by AD because the appendix wording required "All, except A318 elite A319CJ and A320/A319 post SB57-1193 and pre mod 151574"

The sentence should be Post Mod 151574 as written in the chapter applicability

"All manufacturer serial numbers MSN, except those having embodied Airbus modification (mod) 15174 in production."

Thank you to clarify effectivity

EASA response:**Comment noted.**

A) Comments not agreed. Airbus is not able to justify more compliance time. No changes have been made to the Final AD in response to this comment

B) Comment agreed. Refer to comment #1



Commenter 6: ALL NIPPON AIRWAYS – Hideyuki Kato – 25/08/2016**Comment # 6**

Final reviewing of this PAD, the 'affected aeroplanes' column are confused.
 Compared with Airbus SB, we can confirm the detail of the affected aircrafts.
 Anyway, ANA proposes that the column should be revised to ensure more easier.

EASA response:

Comment agreed. Refer to comment #1.

Commenter 7: Pakistan International Airline – Akhtiar Ali – 01/09/2016**Comment # 7**

PAD 15-051R1 Dated 28 JULY 2016 regarding ATA-53-Fuselage-Pressure Panel Longitudinal Beams-Inspection/Repair/Modification-mandates a new requirement of SDI iaw SB A320-53-1264R1 and after modification iaw SB A320-53-1240 or SB A320-53-1263 constitutes terminating action for the repetitive inspections required by Para (1) of this AD.

Where as Airbus specifies in SB A320-53-1240R1 dated July 04/2016 that "The accomplishment of SB A320-53-1240 or SB A320-53-1263 will cancel the inspection requirements of SB A320-53-1264, therefore, a clarification is required on subject PAD/AD -Terminating action.

Note: We have already performed inspection SB A320-53-1264 on one aircraft, therefore, we understand that a terminating action has been performed and no further inspections are required as Airbus SB.

Kindly clarify terminating action (modification) as mentioned in PAD is for para 1 & 4 also.

EASA response:

Comment agreed. Refer to comment #4.

