


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p><b>EASA PAD No. 15-090</b></p> <p><b>[Published on 06 July 2015 and officially closed for comments on 03 August 2015]</b></p>

**Commenter 1: Etihad Airways – Borja Dosal Roiz – 07/07/2015**

**Comment # 1**

After reviewing EASA PAD 15-090 Etihad would like to make the following comments:

1. EASA has classified PAD 15-090 under ATA 25 (Equipment / Furnishings), but the Airbus Service Bulleting that embodied the inspection and repair is classified under ATA 92 (Electric and Electronic Common Installation). Maybe EASA would like to reconsider the ATA chapter used for the classification of PAD 15-090.
2. In regards to point (1), Etihad would like to suggest EASA to define the interval timelines on a separate table and not within the text of point (1).
3. In regards to point (3). It states that the repair of the 10VU rack lugs does not constitute terminating action. Etihad would like EASA to define which tasks would constitute the terminating action of proposed PAD 15-090.
4. According to Airbus SB A320-92-1087, it takes 84 Man Hours to inspect and repair of the four lugs in the 10VU rack. Due to the high Man power required by the task, it shall be done on C check. For this reason, Etihad would like to propose to EASA to extend the timeline of Initial Inspection (Table 1, section B) from 24 months to 36 months.

**EASA response:**

1. **Comment agreed. ATA Number and Chapter name has been amended in the Final AD accordingly.**
  2. **Comment not agreed. There are only two intervals (one in FH, one in FC) and the current wording makes sufficiently clear that the one reached first applies. EASA does not see how another Table would improve clarify.**
  3. **At this time, no terminating action is defined. Contact Airbus for details when such a solution could be expected, if at all.**
  4. **Comment not agreed. Extension of the compliance time to 36 months is currently not supported.**
- No changes have been made to the Final AD in response to points 2, 3 and 4 of this comment.**

**Commenter 2: United Airlines – Neil Sorensen – 01/08/2015**

**Comment # 2**

United Airlines has reviewed PAD 15-090 and offers the following comments:

1. The inspection requirements following a lug repair are not clearly defined. The PAD states that repair of the lug(s) does not constitute terminating action for the repetitive DET inspection. However, SB A320-92-1087 inspection figures detail an unmodified lug. Operators will need to know which areas to inspect on a repaired fitting otherwise the inspection criteria will be in question.
2. The PAD states to apply the corrective action in accordance with SB A320-92-1087 for any cracked fitting. This SB refers to Repair Drawing R92512003. This drawing must be requested through Airbus each time a crack is found; it is not freely available to disposition during a planned inspection. With an expected repair time of 84 man-hours, requesting and issuing the repair drawing each time a crack is found will cause additional delays due to the unnecessary resources involved. This method risks the aircraft service return schedule. It is more desirable to incorporate the repair into the SRM or SB so that a repair can be accomplished immediately following damage findings.
3. The PAD states to report results (including no findings) to Airbus 30 days following each DET inspection. Considering the area already has a repair developed, and that Airbus has to be contacted for repair drawing for each finding, the requirement to submit inspection reports does not provide value. If it is determined to become mandated, a longer grace period of at least 90 days is desirable. And, clarification is needed as the SB A320-92-1087 inspection report contains a question about what STC equipment is installed on the 10VU and a note to send removed (damaged) lugs to Airbus for investigation. These requests do not appear to be the intent of the reporting results in accordance with the PAD.

**EASA response:**

1. ***Airbus has informed EASA that this point will be reviewed and the SB will be updated accordingly, if necessary, at the next revision opportunity.***
2. ***Comment noted. The operator should request Airbus to resolve this logistical problem. No changes have been made to the Final AD in response to this comment.***
3. ***Comment partially accepted. The reporting results will be used to determine the extent of the problem in the fleet (statistics), any returned parts will indeed be investigated, and information on any additional existing in-service modifications will be taken into account when developing a terminating action solution. Comments on SB (editorial) content should be addressed to Airbus.***

***No changes have been made to the Final AD in response to points 1 and 2 of this comment.***