

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-126 [Published on 28 September 2015 and officially closed for comments on 26 October 2015]

Commenter 1: easyJet – Pawandeep Kalyan – 30/09/2015

Comment # 1

Compliance Times:

The compliance time within the PAD currently states “Within 6 years after the effective date of this AD, or within 12 years after the aeroplane date of manufacture, whichever occurs first”.

From SB A320-53-1298 effectivity list, the earliest EYZ a/c affected was manufactured on 16-Mar-2009 (MSN 3843).

From SB A320-53-1299 effectivity list, the earliest EYZ a/c affected was manufactured on 24-Jul-2008 (MSN 3608).

Based on the PAD compliance time, EYZ would have a large number of affected a/c which do not meet this requirement.

EYZ believes the compliance time stated in the PAD should read:

- “Within 6 years after the effective date of this AD, or within 12 years after the aeroplane date of manufacture, whichever occurs later”

Or:

- “Within 6 years after aircraft manufacture. For aircraft delivered before January 2009, within 12 years after aircraft manufacture”

Comment # 2

Access Requirements:

EYZ strongly recommends that Airbus perform a detailed evaluation to confirm that none of the access requirements to perform SB A320-53-1298 & SB A320-53-1299 inspections fall outside of the 6 year / 1`2 year check scheduled maintenance tasks.

EASA response to comment # 1:

EASA disagrees. Based on risk assessment performed by Airbus, 12 years from date of manufacture is the maximum allowable compliance time. Using “whichever occurs later” would allow an aeroplane manufactured in 2008 to accomplish this AD beyond 12 years from date of manufacture.

According to present PAD, MSN 3608 is required to accomplish this AD within 24 July 2020, that gives more than 4 years from the AD effectivity date.

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

EASA response to comment # 2:

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

Commenter 2: Sabena Technics – Helmi Touel – 01/10/2015**Comment # 3**

Following PAD 15-126, we would like to suggest a two-step process:

1. Identification of parts made of wrong material
2. Replacement of those parts

This suggests a “grace period” between step1 & step 2 (no immediate replacement for wrong parts).

This grace period will allow parts supply (to avoid AOG situation) and a better planning “visibility”.

EASA response:

Comment noted: the PAD does not require that a part, made of wrong material, must be replaced before next flight after the inspection. It is allowed to perform the inspection on a date, replacing the part – if needed – at a later stage. In other words, both inspection and replacement must be accomplished “within 6 years after the effective date of this AD, or within 12 years after the aeroplane date of manufacture, whichever occurs first”, but not necessarily during the same maintenance stop.

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

Commenter 3: AirFrance – Benjamin Pouyet – 06/10/2015**Comment # 4**

PAD 15-127 has been issued for heat treatment non conformity inspections (SB 53-1292 / SB 53-1293 / SB 53-1294) and PAD 15-126 issued regarding material non conformity inspections (SB 53-1298 / SB 53-1299 / SB 53-1198).

The inspections for both campaign are the same (EC conductivity measurement), same thresholds (6YE) and same areas (cabin, fuselage, cargo).

1/ Would not be a simplest solution to issue only one PAD/AD which cover the global non conformity parts subject?

EASA response:

Comment understood, but not agreed: EASA acknowledge that there are similarities between the PADs. Anyway, compliance time is different (“within 6 years after the effective date of this AD, or within 12 years after the aeroplane date of manufacture, whichever occurs first” for PAD 15-126; “Within 6 years after the aeroplane date of manufacture” for PAD 15-127) and the affected fleet is different (some, but not all of MSN from 3586 to 6162 for PAD 15-126; some, but not all of MSN from 4895 to 5578 for PAD 15-127).

***It is EASA opinion that a single AD would be potentially confusing for operators.
No changes have been made to the Final AD in response to this comment***

Commenter 4: Lufthansa Technik AG – Florian Dietsch – 15/10/2015

Comment # 5

We would like to propose to add a note in the section “Required Actions and Compliance Time” which clarifies what kind of date is meant by “date of manufacture”:

Note 1: For the purpose of this AD, the date of manufacture is the date of transfer of title, which is referenced in Airbus documentation at the time of first delivery to an operator.

A similar note was added, as we proposed, to EAD 2015-0026. We also issued this comment during the draft phases of the mentioned AD documents.

EASA response:

Comment agreed: a note was added in the final AD