

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-127 [Published on 28 September 2015 and officially closed for comments on 26 October 2015]

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

Comment # 1

Access Requirements:

EZY strongly recommends that Airbus perform a detailed evaluation to confirm that none of the access requirements to perform SB A320-53-1292, SB A320-53-1293 & SB A320-53-1294 inspections fall outside of the 6 year check scheduled maintenance tasks.

EASA response:

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

Commenter 2: jetBlue Airways – Jackie Walsh – 03/10/2015

Comment # 2

After reviewing PAD 15-127 I only have one minor comment – for all Tables it would be helpful, for continuity between the AD and the SBs to list the affected part numbers in the same order, noting the SB lists the affected PNs in numerical order in Appendix 2 of each SB.

EASA response:

Comment agreed: table 1, 2 and 3 were re-arranged to be consistent with Appendix 2 of Airbus SB A320-53-1292, SB A320-53-1293 & SB A320-53-1294 respectively

Commenter 3: AirFrance – Benjamin Pouyet – 06/10/2015

Comment # 3

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 # 4

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