

COMMENT RESPONSE DOCUMENT

EASA PAD No. 15-128

[Published on 06 October 2015 and officially closed for comments on 03 November 2015]

Commenter 1: Amros Global – Marcel Hollenstein – 07/10/2015

Comment # 1

In regards of applicability, I have a question. We are responsible for an AOC Holder running a A320. This A/C has a certain MOD Status and therefore ALI Task is not applicable iaw MRBR Rules....

Means : A/C is Pre MOD 20416 & Post MOD 21999

Task Applicability requires both Mods « Pre »



A320 FAMILY MAINTENANCE PLANNING DOCUMENT

REVISION: 40 DATE: NOV 14
ISSUE: 01 DATE: FEB 15

REV CODE	SECTION	TASK NUMBER	SOURCE TASK REFERENCE	ACCESS	PREPARATION	ZONE	DESCRIPTION	SKILL CODE	TASK CODE	SAMPLE THRESHOLD	SAMPLE INTERVAL	100% THRESHOLD	100% INTERVAL	SOURCE	TCI	TPS	REFERENCE	MEN	TASK M.H.	ACCESS M.H.	PREP. M.H.	APPLICABILITY
R	3-53	531110-01-1	ALI 531110-01-1 MRB 531110-01-1	812 824	BOLTS REMOVED; INSULATION REMOVED; AIR CONDITIONING DUCTS REMOVED (IF INSTALLED);	125 126	NOSE FORWARD FUSELAGE SPECIAL DETAILED INSPECTION (PHOTO) OF CROSSBEAM SPICING, FR16 AND FR20, LH/RH	NDT	SDI	30000 FC OR 60000 FH	27400 FC OR 54900 FH	36800 FC OR 73600 FH	27400 FC OR 54900 FH	ALI MRB			531100-220-803 NTM 53-11-10	1 1	0.13 0.13	0.02 0.03	0.40	A320 PRE 20416 PRE 21999

Question and confirmation –

- Will ALI Task be applicable in the future regardless of MOD Status ?
- What Table with above mentioned Status will be applicable ?

Thanks for your appreciated feedback.

EASA response:

Comment understood, but not accepted. Tables 1 and 2 of the AD refer to separate tasks, which in the commenter's example case means that for one task (a/c = pre-mod) Table 1 compliance times apply, while for another (a/c = post-mod) Table 2 compliance times apply. The task applicability means that it applies to aircraft that are post-mod 20146, and to aircraft that are post-mod 21999 – not necessarily both post-mod.

MOD 21999 is a consolidated MOD that includes and lists MOD 20146. At AIR level, only one of both will be listed as applicable.

Title of table 1 of the PAD was revised to clarify the requirement.



Commenter 2: SIA Engineering Company – Eugene Chan – 08/10/2015**Comment # 2**

Para (1) of the PAD states that we have to accomplish SDI of the fasteners in accordance with SB A320-53-1286. However, Airbus has issued SBIT 15-0058 informing operators of a typo error on the edge margin value in the said SB Rev 0. Also, SB Rev 1 is expected to be available by Dec 2015. Therefore, will the AD be amended to take instructions from SB Rev 1?

EASA response:

The revised PAD requires compliance to SB A320-53-1286 rev 01

Commenter 3: Air Arabia – Hesham El Mougy – 09/10/2015**Comment # 3**

Refer to subject PAD, kindly be advised that the compliance is not clear, since our a/c is Pre Mod 20416 and Post Mod 21999, so we are confusing which threshold will apply (Table 1 or 2) In Airbus MPD there are a clear compliance for tasks 531110-01-1 & 531110-01-2 and we can easily identify our applicable task, then the threshold we shall comply with.

EASA response:

See EASA answer to Comment #1

Commenter 4: Air France – Fabien Cheval – 14/10/2015**Comment # 4**

Please find hereunder AFR comments regarding:

- A. Paragraph (3) Can EASA clarify the chapter §3 following flowchart SB 53-1286 with findings? SB 53-1286 Flow charts Figure A-FFAAB sheet 02/03 and 04: in case of Crack removed with edge margin ($e/D < 1.5$) after RDAS delivery “NO FURTHER ACTION” is required by the SB. Whereas in §(3) PAD it is specified that AIB approved corrective action does not constitute a terminating action of the repetitive inspection?
- B. Paragraph (9) of EASA 15-128 accomplishment of inspections as required by AD cancels the inspection requirement of ALI task 531110. AFR ask why the SB inspection 53-1286 once rendered mandatory will not supersede ALI inspection in order to avoid double launching in operator IT system.



C. Due to the threshold difference between Item ALI 531110-01-1 previous TH 77 600 FH/ 38 800 FC and PAD 15-128 (post-mod 20416 and 21999) 69 400 FH/ 34 700 FC. Did EASA plan to introduce a grace period from AD issue date matching with normal light check for A/C which are within this two scheduling?

EASA response:

4A. The PAD recognize benefit of RDAS previously applied but cannot substitute RDAS if remaining actions are defined. Paragraph (3) (now 5) also states that Airbus approved corrective actions does not constitute terminating action “unless specified otherwise in the instructions” themselves.

4B. As indicated in the PAD, ISB cancels and replaces ALI. ALI task will be removed from ALS at the next revision after AD issuance.

4C. Comment not agreed. The PAD already contains a ‘grace period’ in specifying the time “since the last inspection per ALI task [as applicable] accomplished before the effective date of this AD”. Note that both Table 1 and 2 specify “whichever occur later”.

No changes have been made to the revised PAD in response to this comment.

Commenter 5: SWISS International Air Lines – Roland Moser – 15/10/2015

Comment # 5a

I do think, that the condition for Table 1 on the PAD 15-128 is not correct. It should state” Table 1 – Inspection of pre-mod 20416 and pre-mod 21999 aeroplanes”. The or condition makes no sense, because for example by POST 21999 both tables would be applicable.

Table 1 – Inspection of pre-mod 20416 or pre-mod 21999 aeroplanes

Threshold (A or B, whichever occurs later)	A: Before exceeding 36 800 flight cycles (FC) or 73 600 flight hours (FH), whichever occurs first since aeroplane first flight
	B: Within 27 400 FC or 54 900 FH, whichever occurs first since the last the inspection per ALI task 531110-01-1 accomplished before the effective date of this AD
Interval (Not to exceed)	27 400FC or 54 900 FH, whichever occurs first

Table 2 – Inspection of post-mod 20416 or post-mod 21999 aeroplanes

Threshold (A or B, whichever occurs later)	A: Before exceeding 34 700 FC or 69 400 FH, whichever occurs first since aeroplane first flight
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EASA response:

See answer to Comment #1.

Commenter 6: Jetstar Japan – Ken Kumakura – 16/10/2015
Comment # 6

Airbus has issued an OIT 15-0058 Rev.00 (dated 13/Aug/2015) that SB A320-53-1286 Rev.00 has a typo error on the edge margin value used in the tables, subtasks and figures in the subject SB. Airbus has informed that the updated SB Rev.01 will be issued in Dec 2015. Therefore, we do not think it is appropriate to mandate SB A320-53-1286 Rev.00, since an AMOC will be necessary for adapting the typos. Instead, we would like to suggest to wait for the SB Rev.01 to be issued, and then mandate the corrected SB Rev.01.

EASA response:

See EASA answer to Comment #2

Commenter 7: Lufthansa Technik – Vincent Bouchet – 20/10/2015
Comment # 7

Please find herewith the comments from DLH/LHT to the PAD 15-128:

- A. §(1): Could Airbus confirm that all A318-PAX, A319-PAX and A321 are post-Mod 20416 or Post-Mod 21999 in order to reflect the effectivity of the ALI task 531110-01-2?
- B. §(7): Why is it to the responsibility of the operator to search in his maintenance records after repair in the area which are covered per RDAS and well known by Airbus?
- C. How could the operator evaluate the definition of the area? Does a former repair on the frame close to the splicing have an impact on the inspection requirement and modification? As such questions could be only answered by Airbus, Airbus should perform a review of the RDAS and contact the operators for affected A/C.

EASA response:

7A MOD 21999 is part of A318, A319 and A321 type definition.

7B and 7C : The owner of the aeroplane is responsible for the continued airworthiness of the aircraft. This task can not be in charge to the Aircraft TCH, which may not have access to maintenance records of each aeroplane. The owner (or its delegate) can seek advice from the TCH, if needed.



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

Commenter 8: American Airlines – Chris Reeves – 22/10/2015

Comment # 8

AAL notes that item numbers (7) and (8) of the “Required Action(s) and Compliance Time(s)” section of PAD 15-128 specify accomplishment of an RDAS review of any repairs that may be installed common to areas affected by the AD. AAL believes this RDAS review should be the responsibility of Airbus who not only has record of such repairs but can also directly specify if any additional/supplemental actions are required to address those repairs with respect to the AD.

EASA response:

See EASA answer to comment #7

Commenter 9: jetBlue Airways – Jimmy Gracia – 27/10/2015

Comment # 9

The intent of SB A32-53-1295 modification is achieved on aircraft with MSN 6176 and subsequent through MOD No. 161255. Based on Para. 9 of subject PAD, are post-mod 161255 aircraft not required to perform ALI Task 531110? In addition, please confirm if post-mod aircraft have an optional of embodying SB A320-53-1286 inspection instructions

EASA response:

MSB 53-1295 embodiment cancels SB 53-1286 and ALI. ISB 53-1286 cancels and replaces ALI requirements. ISB is a pre requisite for MSB 53-1295 embodiment to confirm structural integrity. No changes have been made to the revised PAD in response to this comment

Commenter 10: United Airlines – Neil Sorensen – 29/10/2015

Comment # 10

After reviewing PAD 15-128, United Airlines offers the following comments:



- A. Airbus has published Operators Information Transmission (OIT) 15-0058 informing a typo error regarding the edge margin values referenced in several locations in SB A320-53-1286. The SB has repairs dependent on hole edge margin values (e/D) of 1.5mm (0.059 in.). But the e/D is a ratio and should read 1.5 (no measurement unit). Please note this error in Paragraph (1) and (2) of the PAD.
- B. Paragraph (2) of this PAD states to accomplish corrective action(s) in accordance with SB A320-53-1286, or contact Airbus. For Conf. 03 thru 10 of this SB, repairs can be completed if crack is removed within hole tolerance, e/D is greater than 1.5, and cold working is accomplished. However, when all of these conditions are met, the next SB instruction states to contact Airbus for an RDAS. The PAD and SB do not specify why an RDAS is necessary. Even when the all conditions are met for repair, the operator is obligated to contact Airbus regardless if repair can be accomplished in accordance with SB A320-53-1286. Please clarify if and why an RDAS needs to be obtained if the repair is satisfactory with the SB limits.
- C. Paragraph (3) of this PAD states that the corrective action as required by paragraph (2) does not constitute terminating action by paragraph (1). The corrective action specified in SB A320-53-1286 for Conf. 03 thru 10 (see Table 3 & 4) state 'No further action' and no repetitive inspections for cracks removed and cold working accomplished on the applicable frame location and side. Thus, paragraph (3) should state that the corrective actions per SB A320-53-1286 constitutes terminating action for the applicable frame location and side if the cracked hole(s) are within hole reaming tolerances, edge margin value, and cold working applied.
- D. There is a typo in Subtask 531286-832-003-002 and 531286-832-004-002 inspection instructions: should read "Do the... Inspection... at FR 20" not "FR16". Please consider noting this in PAD paragraph (1) and (2).
- E. Paragraph (7) and (8) of this PAD does not appear necessary. Determining if a repair in the affected is unrelated to ALI task 531110 may be inconclusive. And it is difficult to understand why this is relevant. The ALI task is an inspection which may or may not be referenced in a documented repair. If during the initial inspection per PAD paragraph (1) a repair is found, Airbus would typically be contacted for instructions to address the abnormal configuration, possibly by RDAS instruction. Please consider omitting paragraph (7) and (8) since it is standard practice for any AD to contact Airbus for repairs found that hinders the mandated inspection and/or modified areas.

EASA response:

10A see answer comment #2

10B In case a repair is needed, Airbus RDAS process is recognized to comply with AD requirements. Should a repair being performed out Airbus scope, operators can proceed with AMOC.

10C See answer comment #4A

10D Comment agreed: SB typo error confirmed. This has been corrected by Airbus with SB at revision 1.

10E Comment not agreed: a standard practice can not be relied upon as a corrective action related to an AD.

No changes have been made to the revised PAD in response to this comment

