


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 15-131</p> <p>[Published on 12 October 2015 and officially closed for comments on 07 November 2015]</p>

Commenter 1: Lufthansa Technik – Vincent Bouchet – 20/10/2015

Comment # 1

Please find herewith the comments from DLH/LHT to the PAD 15-131:

- (8): 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?

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:

Copy the response to comment #1 here

Comment not agreed. According to Regulation (EC) 1321/2014, 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 2: United Airlines – Neil Sorensen – 29/10/2015

Comment # 2

After reviewing PAD 15-131, United Airlines offers the following comments:

- A. PAD paragraph (1) and Table 1 (Less than 1800 FC) do not specify specific threshold and intervals. Rather it refers to SB A320-53-1288 for the compliance time:
- i) The compliance time in this SB are contained in different tables, appendices, and even refers to the SRM for inspection intervals. Considering this PAD allows the use of later revision of SB A320-53-1288 per the Ref. Publications section, the mandated inspection threshold and intervals will not be controlled within the AD. If the SRM and/or SB revises the inspection timescale, the compliance time will be confusing as to what time(s) is mandated.
 - ii) The compliance time that is referenced in SB A320-53-1288 Appendix 2 give flight cycle and flight hour values, but does not specify 'whichever occurs earlier

(or later)' and 'since aeroplane first flight'.

- iii) There is no grace period for the inspection threshold. Considering some MSN may be above the threshold, a grace period should be considered from the last accomplishment of ALI 534129 and 534130.

B. Paragraph (6) of this PAD is unusual and appears redundant to the standard practices of an operator. Any SRM or RDAS repaired as a result of ALI 534129 or 534130 should already be contained in the operator's maintenance program to repetitively inspect these repairs as per SRM or RDAS requirements. Could this be reworded to simply give previous credit for any SRM or RDAS repairs as a result of ALI 534129 or 534130?

C. Please clarify paragraph (7) of this PAD. The statement that modification per SB A320-53-1290 for undamaged holes constitutes terminating action appears to disagree with paragraph (3) of this PAD. In other words, what is the difference between modifying per SB A320-53-1290 before the effective date of AD versus post-AD inspection per SB A320-53-1288?

D. Paragraph (8) and (9) of this PAD does not appear necessary. Determining if a repair in the affected is unrelated to ALI 534129 or 534130 may be inconclusive. And it is difficult to understand why this is relevant. The ALI task is an inspection which 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 (8) and (9) since it is standard practice for any AD to contact Airbus for repairs found that hinders the mandated inspection and/or modified areas.

Thanks you for your time in considering these suggestions for the final AD.

EASA response:

Comment A - i) Comment not agreed. A revision of documents supporting an AD is always approved by EASA before its issuance; this is the reason why "later approved revisions of those documents are acceptable for compliance". If any of these revisions requires compliance at shorter intervals, according to EASA procedures, a new AD is issued, superseding the existing one. If compliance intervals are extended, that SB revision may be used with no need for new AD (a revision of the AD may be issued in this case). No changes have been made to the Final AD in response to this comment

Comment A - ii) Comment agreed. SB will be revised to include this information. A note has been added in the AD to confirm that it is whichever occurs earlier. This is valid for all compliance mixing FC and FH.

Comment A – iii) Comment agreed: according AD 2015-0083 compliance time (thresholds and/or intervals) for both tasks were either reduced and/or increased with a 2 years global compliance time without exceeding previous published times. AD has been updated accordingly.

Comment B) Comment not agreed. If not otherwise stated in the AD itself, any deviation from an AD requirement has to be managed by mean of AMOC process. Paragraph 6 gives credit to instructions issued by the TCH, and remove the need for specific AMOC. No changes have been made to the Final AD in response to this comment

Comment C) Comment not agreed. Paragraph 7 is applicable to an aeroplane that has already been inspected in accordance with ALI 534120 or 534130 and repaired before the effective date of the AD to confirm credit of previous inspections. Paragraph 3 remains applicable. No changes have been made to the Final AD in response to this comment

Comment D) Comment not agreed. If not otherwise stated in the AD itself, any deviation from an AD requirement has to be managed by mean of AMOC process. Paragraphs 8 and 9 give credit to instructions issued by the TCH, and remove the need for specific AMOC. No changes have been made to the Final AD in response to this comment