

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-151 [Published on 08 December 2015 and officially closed for comments on 05 January 2016]

Commenter 1: HNA Technik – Wang Jingtao – 14/12/2015

Comment # 1

1 - In your Proposed AD, you have mentioned “paragraph (1) of this AD”, but it is not clearly for customer to get it

2 - EASA AD 2015-0021, which will be superseded by your new proposed AD which in addition requires replacement of all non-conforming aft engine mount retainers listed in SB A320-71-1070, and we will plan to comply with new AD by those ways: Firstly, for those not affected by SB A320-71-1070 aircrafts, which have complied with EASA AD 2015-0021, we will continue to perform the repetitive inspection described in AD 2015-0021, can this way for those A/C be acceptable to comply with new AD? Secondly, for those affected by SB A320-71-1070, which must be performed both the replacement of the inner retainer brackets in SB A320-71-1070 and the repetitive inspection described in AD 2015-0021, can this way for those residual A/C be acceptable to comply with new AD?

3 - For a same part retainers, EASA have issued three AD to correct it, will you have a plan in future to limit Goodrich to delivery the quality deficiency parts to customer? if yes, what is your schedule and method to finally eliminate this risk?

EASA response:

1 – This is a standard wording within EASA ADs. It refers to the first paragraph of the “Required action(s) and compliance time(s)” (RACT).

2 – SB A320-71-1070, and the EASA AD 2016-0010, require replacement also of parts which traceability can not be confirmed, and not only of those parts listed in relevant appendixes. Furthermore, the new AD prohibit installation on any aeroplane of parts that are listed in its Appendixes, or which traceability cannot be confirmed. The EASA AD 2015-0021 will be superseded on the effective date of the new EASA AD 2016-0010, and all the requirements of EASA AD 2015-0021 are retained in the new AD. Consequently, the repetitive inspections previously required by AD 2015-0021 will be still required on all aeroplanes affected by the new AD; compliance is anyway required to the new AD and not to the superseded one.

Based on the above, the suggested methods of compliance are incomplete and can not be considered adequate.

3 – Monitoring of suppliers is responsibility of, and is routinely performed by, the Aircraft manufacturer and Aviation Authorities; this process may be refined following reporting and occurrences, and is part of the wider process ensuring the continuous airworthiness of a fleet. EASA does not generally provide to operators information, like possible corrective actions and schedule agreed with a supplier, as a result of this monitoring.

No changes have been made to the Final AD in response to these comments.

Commenter 2: GE Celma – Wandercleisson Pimentel – 04/01/2016**Comment # 2**

During an Analysis of a Notification of a proposal to issue an Airworthiness Directive by EASA, was identified some doubts that we want to share with EASA.

Our doubt is on item 9.3 of EASA PAD No.: 15-151 that states the following:

“(9.3) Part installed on an aeroplane between the aeroplane date of manufacture or 01 March 2015 (whichever occurs later) and the effective date of this AD, and that cannot be identified by a PO.”

Considering that GE Celma, as an engine shop, does not have access to the information of the engine original airplane MSN and its manufacturing date, neither the operators maintenance records to verify a retainer replacement, how can we identify an affected retainer? Is it possible for EASA to issue the affected retainers SN list on the AD?

EASA response:

Paragraph 9.3 of the RACT is applicable to parts that cannot be identified by a PO or, in other words, parts which traceability can not be confirmed. There is no way to identify, on the effective date of the AD, how many and which parts have not a complete tracked history after being delivered to operators, Part 145 or other entities.

More in general, if in doubt, EASA suggest to require information from aircraft operator, CAMO, Airbus or any other involved entity.

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