



COMMENT RESPONSE DOCUMENT

EASA PAD No. 15-156R1

[Published on 29 September 2016 and officially closed for comments on 13 October 2016]

Commenter 1: Lufthansa Technik AG – Vincent Bouchet – 30/09/2016

Comment # 1

DLH assumes that Airbus took into account the interval of a D-check in the definition of the threshold for the embodiment of the SB A320-53-1262 (or if applicable 53-1333 or 53-1334). This effort is well appreciated from the airlines but is not reflecting the time necessary to receive the material (120 days). This is a burden for Airlines with bigger fleet and tight scheduled D-check layover plan. For this reason DLH would appreciate to set the threshold to 76 months.

EASA response: Comments not agreed. Current compliance time has been already reconsidered further AIRBUS difficulties and delays to define the design change. No changes have been made to the Final AD in response to this comment.

Commenter 2: Cathay Pacific Airways Limited – Hyphen Choi – 06/10/2016

Comment # 2

CPA / HDA have reviewed the PAD 15-156R1 and have some comments.

A. HDA fleet are applicable to SB 53-1262 and SB 53-1333, the a/c SB configuration as shown in the table below.

Aircraft Model	Registration	MSN	SB-53-1262 Config	SB-53-1333 Config	mod 154046	mod 154583	mod 26903	mod 22768	Mod 153899, 154046, 154583 ,25940 ,26903, 26994 and 34305
A321-231	B-HTD	0993	006	N/A	N	N	Y	N	
A321-231	B-HTE	1024	006	N/A	N	N	Y	N	
A321-231	B-HTF	0633	015	N/A					N
A321-231	B-HTG	1695	006	N/A	N	N	Y	N	



A321-231	B-HTH	1984	006	N/A	N	N	Y	N	
A321-231	B-HTI	2021	006	N/A	N	N	Y	N	
A321-231	B-HTJ	3369	006	N/A	N	N	Y	N	
A321-231	B-HTK	3669	006	N/A	N	N	Y	N	
A320-232	B-HSD	0756	N/A	001					
A320-232	B-HSE	0784	N/A	001					
A320-232	B-HSG	0812	N/A	001					
A320-232	B-HSI	0930	N/A	001					
A320-232	B-HSJ	1253	006	N/A	N	N	Y	Y	
A320-232	B-HSK	1721	006	N/A	N	N		Y	
A320-232	B-HSL	2229	006	N/A	N	N	Y	Y	
A320-232	B-HSM	2238	006	N/A	N	N	Y	Y	
A320-232	B-HSN	2428	006	N/A	N	N	Y	Y	
A320-232	B-HSO	4023	006	N/A	N	N	Y	Y	
A320-232	B-HSP	4247	006	N/A	N	N	Y	Y	
A320-232	B-HSQ	5024	006	N/A	N	N	Y	Y	
A320-232	B-HSR	5030	006	N/A	N	N	Y	Y	
A320-232	B-HST	5362	006	N/A	N	N	Y	Y	
A320-232	B-HSU	5429	006	N/A	N	N	Y	Y	

We have number of aircrafts are Config 006 of SB 53-1262 Rev 01.

###QUOTE###

**CONF 006

Config. 006 is valid for:

- All A318 aircraft given in the effectivity of this Service Bulletin
- A319 and A320 aircraft given in the effectivity of this Service Bulletin on which Modification No. 154046K16176, 154583K16365, 26903K4946 and 22768K2726 are embodied
- A321 aircraft given in the effectivity of this Service Bulletin which Modification No. 154046K16176, 154583K16365 and 26903K4946 are embodied and bonding lead connecting the vertical strut and the transversal beam of Frame 65 is installed.

###UNQUOTE###



We believe the above red-highlighted should be “or” instead of “and”.

Please clarify and confirm the above Config are correct for complying the AD requirement.

B. The PAD proposes the effective date is 14 days after the AD issue date, please consider to extend it to 30 days giving us enough time to setup the documentations, settle the planning and inventory actions.

EASA response:

A. Comment understood. Airbus has confirmed that your interpretation is correct. Next SB revision will correct the configuration definition.

B. Comment not agreed. Extending the interval to 30 days would require a consistent reduction of the compliance time. Furthermore, the AD does not mandate any action on the effective date of the AD itself, so there is no reason to have all the planning and inventory actions, as also any other document required to comply with the AD, completed / issued on the effective date of the AD. To be also noted that the 14 days interval is consistent with the issuance interval of the bi-weekly report on the AD publishing tool.

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

