



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-013

[Published on 28 January 2016 and officially closed for comments on 25 February 2016]

**Commenter 1: EasyJet – Geoff Hurst – 16/02/2016**

### Comment # 1

Please note that EZY is only concerned by the slide pack assemblies in Appendix 2 of this AD.

EZY considers that the wording of para (8) is open to misinterpretation and that the meaning is not clear and precise.

The term “modification of that aeroplane” implies that all four escape slide pack assembly have being replaced/aeroplane delivered with slide P/N identified as “new” in Appendix 2 of this AD.

The escape slide pack assemblies will be modified in accordance with AirCruiser VSB at slide overhaul or on attrition within the prescribed AD time scale. Consequently the aeroplane will not be fully modified in accordance with the applicable Airbus SB until all four slides are replaced.

Provided EZY’s interpretation of the PAD is correct we would suggest that the existing para (8) is deleted in its entirety and replaced with the new para (8) below.

(8) Do not install on any aeroplane an escape slide pack assembly except:-

(8.1) Within the time requirement of paragraph (4) an escape slide pack assembly installed having a P/N identified as “old” in Appendix 2 of this AD can be replaced by an escape slide pack assembly having a P/N identified as “old” or “new” in Appendix 2 of this AD in that position.

(8.2) From the effective date of this AD an aeroplane having an escape slide pack assembly installed having a P/N identified as “new” in Appendix 2 can only be replaced by an escape slide pack assembly having a P/N identified as “new” in Appendix 2 of this AD in that position.

### EASA response:

***Comment not agreed. The interpretation of Easy jet is correct. Until an aeroplane is not completely modified (i.e., all the affected escape slide pack assemblies have been replaced with not affected parts) it is allowed installing “old” P/N (as listed in appendix 2). Wording suggested by EZY would be more restrictive than the proposed text and, based on risk evaluation, would represent an unnecessary burden on operators.***

***This requirement must not be interpreted as an invitation to delay the accomplishment of the requested actions. The AD define the maximum allowed compliance time; accomplishing an AD requirement in advance is generally advised.***

***No changes have been to the final AD in response to this comment.***



**Commenter 2: United Airlines – Oscar Fernandez – 24/02/2016**

- Ref: 1. EASA PAD 16-013 dated 1/28/2016  
 2. DGAC France AD F-2004-072 (EASA approval 2004-5335) dated 5/26/2004  
 3. FAA AD 2004-26-07 - Inflation Hose Retainer  
 4. EASA AD 2011-0160R2 dated 1/24/2013  
 5. FAA AD 2012-23-10 - Anti-Rotation Bracket & Cable Guide  
 6. Zodiac AirCruisers SB 004-25-96 dated 9/18/2015  
 7. Zodiac AirCruisers SB 004-25-97 dated 9/18/2015

EASA PAD 16-013 is proposed to supersede DGAC France AD F-2004-072 (equivalent to FAA AD 2004-26-07) and EASA AD 2011-0160R2 (equivalent to FAA AD 2012-23-10) while retaining their requirements. The proposed AD will include a product improvement in the slide & slide/raft deployment sequence as developed by Zodiac AirCruisers. Modified slides and slide/rafts are identified by a change in Part Number (P/N). United Airlines has the following comments:

**Comment # 2**

1. United Airlines is unable to comment on the proposed 36-months compliance time from the effective date because lead time information on the materials is not currently provided in ref. 6) and ref. 7).

**Comment # 3**

2. United Airlines would like to highlight that both ref. 6) and ref. 7) contain wording in the References section that “Under no circumstances shall the modified equipment, resulting from the application of this Service Bulletin, be installed on the aircraft type unless its aircraft SB is approved.” United Airlines is unaware of an Aircraft Level Service Bulletin released by Airbus to support these modifications. Therefore, we are unable to incorporate the service bulletins at this time.

**EASA response:**

**Comment #2: Comment noted.**

**Comment #3: Comment not agreed. Airbus Service Bulletin SB A320-25-1B81, SB A320-25-1B82, SB A320-25-1B83, SB A320-25-1B84, support the modification.**

**No changes have been to the final AD in response to these comments**

**Commenter 3: Cathay Pacific – John Wong – 25/02/2016****Comment # 4**

The below query is concerning some requirements on paragraph (4) and (8) of the PAD.



(8) Do not install on any aeroplane an escape slide pack assembly, having a P/N identified as “old” in Appendix 2 of this AD, as required by paragraph (8.1) or (8.2) of this AD, as applicable.

(8.1) For an aeroplane with an escape slide pack assembly installed having a P/N identified as “old” in Appendix 2 of this AD: After modification of that aeroplane as required by paragraph (4) of this AD.

(8.2) For an aeroplane that does not have an escape slide pack assembly installed having a P/N identified as “old” in Appendix 2 of this AD: From the effective date of this AD.

(4) Within 36 months after the effective date of this AD, replace each escape slide pack assembly, having a P/N identified as “old” in Appendix 2 of this AD, with a new escape slide pack assembly, having the corresponding P/N identified as “new” in Appendix 2 of this AD.

Currently, some of our aircraft are equipped with slides with P/N identified as “old” in Appendix 2 of the PAD 16-013. And there are some regular Slide Deployment Sampling test being carried out.

We would like to ask if there is a slide deployment test carried out on certain aircraft with slides with P/N identified as “old” in Appendix 2 of the PAD 16-013, can we install a slide with P/N identified as “old” in Appendix 2 of the PAD 16-013 back onto the aircraft after the test, if the ‘modification of the aeroplane as required by paragraph (4) of the EASA PAD 16-013’ has not been carried out during the ‘36 months’ period?

***EASA response:***

***Comment noted. Installation of a slide pack assembly, having P/N identified as “old”, is allowed, as long as the aircraft is not modified as required by the AD. See also EASA response to Comment # 1***

