



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-022

[Published on 10 February 2016 and officially closed for comments on 09 March 2016]

Commenter 1: Air Canada – Wing Cheung Bert Liu – 11/02/2016

Comment # 1a

We are NOT in favour of this fan cowl latch mod with key on our CFM56-5A/B fleet classified as mandatory.

1. We have dual signatures sign-off on our cowl closure and is very robust and does demonstrate as adequate for our maintenance needed.
2. The key with the red flag cannot totally eliminate an unlatch cowl. If the red flag is missing, the whole purpose of implementing this mod is useless. A key without this flag is the same as someone didn't latch the cowl properly.
3. IT is the operator maintenance crew culture that needs to be changed, and this varies between operators. Therefore, this mod should be classified as "Recommended" to operator and not mandatory.
4. We foresee LOST, BROKEN, STUCK, BEND, FROZEN, SEIZED keys will ground out of station aircraft. These scenarios obviously does have financial impact.

Comment # 1b

5. How do we come up with the 35months grace period? How about a 72 months period? Or no grace at all? Is this statistic based number on the Part departing airplane?

Air Canada would like to know the data, assumption and method that was used to come up with this grace period.

We have to assume the results is unbiased and clearly represent our as Top Tier Airline maintenance operation.

We also have posted an FAIR comment in Airbusworld about this mandatory retrofit. FAIR-ISP Item 16.0005 (Attached).

Please reconsider my above observation as the key does not totally eliminate the risk associate with the un-latch cowl.

EASA response:

Comment # 1a: comment noted. The operator may apply for an Alternative Means of Compliance to the AD, providing data supporting his request.

Comment # 1b: comments noted. EASA cannot share data used to define 35 month compliance time with operators.

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



Commenter 2: All Nippon Airways Co., Ltd – Norio Kushida – 12/02/2016

ANA reviewed the PAD from the point of operator's view and side effect of the key modification. Understanding the concept of this key modification which enables visual cue (Key and Flag) in the cockpit ensures pilots that the Fan Cowl is securely closed and locked. Side and adverse effect of this modification is that the Key, which is contained in the cockpit, becomes essential tool to open the Fan Cowl even in emergency situation.

Request and Inquiry

Comment # 2a

In case, such as after push back from a gate, mechanic find emergency situation of the engines which requires immediate reaction with cowl open, time delay of setting stair or bridge at the gate, opening the door and round-trip to cockpit it will definitely slow this action. Probable cases are like fluid leakage, unusual sound and smoke or mist. As there is no alternate / emergency method to open cowl is provided, please clarify the risk assessment for above case.

Comment # 2b

There is a maintenance procedure in the AMM to run an engine up to idle with Fan Cowl open to monitor leakage. This key with flag cannot be removed when fan cowl is open. Engine run up with a key and flag attached is not desirable for FOD perspective. How is this case assessed?

EASA response:

Comment # 2a: Comment noted: This scenario has been addressed to Airbus that may define as needed a procedure. Operator may seek advice from Airbus. No changes have been made to the Final AD in response to this comment.

Comment # 2b: Comment not agreed. No Airbus AMM procedures require engine running with FCD open. Anyway, if an engine is run with FCD open, it is assumed that standard practice may be used to manage the risk of FOD related to the flag linked to the key (e.g., the flag can be secured by means of adhesive tape). In case of doubt, the operator may seek advice from Airbus. No changes have been made to the Final AD in response to this comment.

Commenter 3: Virgin America – Krista Dial – 18/02/2016**Comment # 3a**

1. EASA PAD 16-022 Required Action(s) and Compliance Time(s) paragraph (1) states to “accomplish concurrently the actions as required by paragraphs (1.1), (1.2) and (1.3) of this AD, in accordance with the instructions of Airbus Service Bulletin (SB) A320-71-1068”. Paragraph (2) addresses the case in which both Airbus modifications 157517 and 157519 (or 157517 and 157521) have been embodied in production.

Virgin America has very recently taken delivery of several airplanes upon which modification 157519 (placard installation) has been embodied in production, but 157517 (latch modification) was not embodied in production. Please specifically address this case or reword paragraph (1).



Comment # 3b

Comments for Issues noted in Mandated Service Bulletins:

1. UTAS SB RA32071-163 Step 3.I.H states “In addition, electro-etch the Right Hand and Left Hand Fan Cowls part number on the fan cowl mod plate and re-identify following the table of paragraph 2.E.”

Virgin America requests that vibro etch be added as an alternative to electro etch. Goodrich has confirmed this is an acceptable alternative to electro etching via UTAS Aerostructures Technical Request # CV16-0429.

Instructions for re-identification process are not clear (i.e., strike a single line through the original part mark).

2. Airbus SB A320-71-1068 Section 1 Planning Information Item K lists the affected publications, including AMM 71-13-16. AMM 71-13-16 does not appear to exist in AMM Revision 43 available on AirbusWorld.

3. Airbus SB A320-71-1068 Rev 00 Appendix 01 does not correctly identify the retrofitted modifications. The retrofitted modification identification for Configurations 004 through 007 should be 157517 and 157519 (not 157517 and 157521).

Airbus confirmed this error in Airbus World TechRequest message 80120758/003 and advised that a revision to the service bulletin would be forthcoming in April 2016.

4. UTAS SB RA32071-163 step 3.I.E.(1) refers to Illustration 5 and AMM Subtask 71-13-13-640-050-A for cleaning of the surface where the 122450-5A25 bolt (20) is to be installed. However, Subtask 71-13-13-140-050-A is the relevant subtask. Also note that SB RA32071-163 Illustration 5 does not clearly illustrate the bolt 20 location (should be Illustration 6).

5. UTAS SB RA32071-163 step 3.I.E.(2) refers to AMM Subtask 71-13-13-420-050-A for cleaning the threads of the bolt and applying lubricant. However, Subtask 71-13-13-640-050-A is the relevant subtask for this action.

For comments 4 and 5 above, it is recommended to remove the AMM subtask references entirely since they do not add any new information or refer to the AMM Task (71-13-13-400-041-A) in lieu of Subtasks.

EASA response:

Comment # 3a: Comment agreed. The final AD has been modified accordingly

Comment # 3b: comments noted. This request has been forwarded to Airbus. Should an update of referenced SB will be deemed required, this update will be reviewed and, if required, AD revision or Supersedure be evaluated. No changes have been made to the Final AD in response to this comment.



Commenter 4: Lufthansa Technik AG – Carsten Burk – 22/02/2016**Comment # 4**

Herewith Lufthansa Technik would like to add some comments respectively request the following changes on the PAD's (16-009 & 16-022) related to the Fan Cowl Door Latch with Key and Flag – Modification for IAE V2500 and CFMI CFM56 Engines.

Comments for IAE V2500 (PAD 16-009) and CFMI CFM56 (PAD 16-022) Engines:

1. Many operators have A320 Family aircraft with both, IAE V2500 and CFMI CFM56 Engines. For both engine types the same modifications will be implemented within the aircraft, required by PAD 16-009 and PAD 16-022. The only difference will be the modification of the Fan Cowl Latch itself. Nevertheless for planning purposes it is easier to manage both ADs together. This would only be possible in case of the effective date of both ADs will be the same. Please consider to publish both ADs at the same date.

2. It would be very helpful if the applicability would be more specified like the example below, marked in red:

Applicability: Airbus A319-131, A319-132, A319-133, A320-231, A320-232, A320-233, A321-131, A321-231 and A321-232 aeroplanes, all manufacturer serial numbers **equipped with IAE V2500**.

EASA response:

Comment # 4: Comment partially agreed. All models listed in the applicability are equipped with CFM engines. Title of the AD has been modified; also considering a similar AD is being issued applicable to aeroplanes equipped with IAE engines.

Commenter 5: Air France – Benoit Richet – 22/02/2016**Comment # 5a**

First of all, for your information, please note that this AD will cost for the 124 AFR A/C 1.193.624 USD (only for kit, Man/Hours not included).

AFR does not understand how the EASA can leave UTAS to fix a price for an Airworthiness Directive and so compel the purchase of this kit by the company.

Comment # 5b

1. Interchangeability: If an A/C is Post Mod VSB RA32071-123, AFR would like to know if, in case of AOG, we can temporarily de-modified the AC by the installation of Pre Mod Fan Cowls.

Comment # 5c

2. AFR would like to know the interchangeability and the feasibility with the VSB RA32071-117:

If the application of the VSB RA32071-163 is done before the VSB RA32071-117, we risk to de-modify the AC.



If the application of the VSB RA32071-117 is done before the VSB RA32071-163, the forward latch will be change for nothing.

3. Could you please give us the AD release date and the release date of new Airbus AMM Task concerning the Latch Fan Cowl Adjustment?

4. Could you please incorporate the VSB RA32071-163 as reference in the PAD and in the future AD?

5. The PAD 16-022 chart lists all Part Number Pre RA32071-163 and the new PN Post RA32071-163.

However, the PN 238-0301-509 is not listed whereas it is the Rohr CMM and in the Airbus AMM.

EASA response:

Comment # 5a: Comment noted. EASA offers the possibility of certifying an alternative modification to be accepted under an AMOC

Comment # 5b: Comment noted. Installation of pre-mod FCD is addressed by paragraph (3) of the PAD, now (5) in the AD

Comment # 5c: Comments noted; Pre and post VSB RA32071-117 FCD P/N are listed as old P/N in the proposed AD and according interchangeability it is not authorized to de-modify the aeroplane.

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

