



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-048

[Published on 05 April 2016 and officially closed for comments on 19 April 2016]

Commenter 1: Air France – Didier Boulanger – 06/04/2016

Comment # 1

On both PAD 16-048 and 16-049 it is mentioned: “Reason: Following the results of a new full scale fatigue test campaign on the A321 airframe in the context of the A321 extended service goal,..... This condition, if not detected and corrected, could reduce the structural integrity of the fuselage.”

Both threshold are before DSG (48000 FC). Our understanding is that such inspection is required to maintain airworthiness (structural integrity) on aircraft operated on ESG envelop.

Question: if analysis done in order to operate aircraft beyond DSG (48000 FC/ 60000 FH), could you clarify the reason why inspection is required on aircraft for which operators already decided not to operate beyond 48000 FC? Could you please consider not mandating the inspections to those operators ?

This question is not limited to these two subject PAD but all recent ADs issued for the same reason and with Threshold before DSG (48000 FC)

EASA response:

Comment #1 – Comment understood. The unsafe condition, even if identified during test performed in the context of the A321 extended service goal, may affect also aircraft not expected to be operated beyond the DSG. The reason of the AD has been updated accordingly.

Commenter 2: Lufthansa Technik – Dennis Geipel– 07/04/2016

After reviewing this PAD, please find enclosed our comments:

Comment # 2a

PAD Par. (3) states “Repair of an aeroplane as required by paragraph (2) of this AD does not constitute terminating action for the repetitive DET as required by paragraph (1) of this AD for that aeroplane.”.

We have already inspected several LHT customers’ A/C and, in the area affected by Airbus SB A320-53-1308 until A320-53-1313 (not part of this PAD), accomplished repairs according to Airbus instructions. Those repairs are considered terminating action for the repetitive inspections as per the relevant SB (approved by Airbus RDAS).



We also expect that repairs performed as per Par. (2) of this AD could be considered terminating action for the repetitive inspections as per the relevant SB A320-53-1317 until A320-53-1320 and this AD, if approved by Airbus RDAS. Therefore we would like to propose AD Par (3) amendment reflecting the termination of the repetitive inspections mandated by this upcoming AD, if approved by Airbus RDAS:

“Repair of an aeroplane as required by paragraph (2) of this AD does not constitute terminating action for the repetitive DET as required by paragraph (1) of this AD for that aeroplane, unless specified otherwise in the instructions or approvals provided by Airbus.”

Comment # 2b

PAD Par. (1) states “Before exceeding 36900 flight cycles (FC) since aeroplane first flight, or within 2500 FC after the effective date of this AD [...], accomplish a DET [...]”.

“2500 FC after the effective date of this AD” is in line with the grace period published through OIT 999.0098/15 Rev.00 (3750 FC from SEP 2015), when the calculation is based on an average utilization of roughly 2150 FC/year (AD effective date expected End of APR 2016; grace period reduction of 1250 FC in 7 months).

As from our experience, we cannot confirm findings through SB A320-53-1317 until A320-53-1320 (12 SB accomplishments on 3 A/C, 2 A/C beyond Inspection Threshold, 0 findings), we would like to propose re-considering setting the grace period to “3750 FC after the effective date of this AD”, as known from standard EASA wording and past ADs and retaining the grace period FC value set with OIT 999.0098/15 Rev.00.

EASA response:

Comment #2a: Comment agreed, the AD has been updated accordingly

Comment #2b: Comment not agreed. The available data and analysis do not allow accepting LHT request as applicable to the entire A321. LHT can anyway require an AMOC applicable to a specific fleet.

