



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-049

[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 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: Austrian Airlines – Erwin Fleberger – 07/04/2016

Comment # 2

PAD 16-049 provides a grace period of 2500FC after AD effective date. This is far less than the grace period of 5000FC (after 30 Sep 2015) provided by the already published Airbus SB A320-53-1315/1316.

The difference will reduce the grace period by approximately one calendar year. This will force us to perform the inspections outside of suitable ground times like C-Check or higher causing a high burden on operator flight schedule.

Austrian requests therefore to publish same grace period as provided by Airbus SB or to provide staggered grace periods depending on actual aircraft flight cycles.

EASA response: Comment agreed. The grace period has been extended to 3300 FC from the AD effective date (the difference from the grace period in the SB being based on average FC per month).



Commenter 3: Lufthansa Technik – Dennis Geipel– 07/04/2016**Comment # 3a**

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

In line with what we have commented for PAD 16-048, repairs performed as per Par. (2) of this AD could potentially be considered terminating action for the repetitive inspections as per the relevant SB and this AD. 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 SDI as required by paragraph (1) of this AD for that aeroplane, unless specified otherwise in the instructions or approvals provided by Airbus.”

Comment # 3b

PAD Par. (1) Table 1 lists a grace period of “Within 2500 FC after the effective date of this AD”.

“2500 FC after the effective date of this AD” is only in line with the grace period published through OIT 999.0098/15 Rev.00 (5000 FC from SEP 2015), when the calculation is based on an average utilization of roughly 4300 FC/year (AD effective date expected End of APR 2016; grace period reduction of 2500 FC in 7 months). This utilization is to our mind not realistic. We would like to propose re-considering setting the grace period to “5000 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.

Comment # 3c

If LHT comment 2/ is not agreed, we would like to propose using the same A/C utilization for grace period determination that has been used in PAD 16-048 (roughly 2150 FC/year). This would lead to a grace period of “Within 3750 FC after the effective date of this AD” to be inserted into AD Par. (1) Table 1.

EASA response:

Comment #3a: Comment agreed, the AD has been updated accordingly

Comment #3b and #3c: See EASA answer to Comment #2.

