



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-052

[Published on 13 April 2016 and officially closed for comments on 11 May 2016]

Commenter 1: AMAC Aerospace – Pavol Sikula –14/04/2016

Comment # 1

Reading proposed PAD 16-052 further clarification of applicability is needed.

As I understood reason of this AD it is to add more MSNs, those that has been added to Airbus SB A320-27-1206 Rev 02 and are listed on PAD Table 2, Additional affected aeroplanes.

For example if MSN 3379 is not listed in SB A320-27-1206 Rev 02 Effectivity per MSN and no Interconnecting Strut has been replaced since first flight no further action will be needed per this PAD

As PAD is written now, we will need to physically verify installed P/N of IS and Target sensors per PAD par 1.2 even if MSN 3379 is not listed in SB A320-27-1164 effectivity.

Issue is that record verification will not help much as Airbus AIR list of installed parts does not unfortunately include Interconnecting Struts.

PAD par (2) reads: “and on which no interconnecting strut with a P/N as identified in Table 1 of this AD is installed” that means we need to verify per PAD par (1.2) PN installed even MSN 3379 is not in SB Effectivity.

Solution could be to change text in PAD par (2) to: : “and on which no interconnecting strut with a P/N as identified in Table 1 of this AD is installed **since aeroplane first flight**, are not affected...”

EASA response:

Comment understood, but not agreed.

The understanding of the reason is correct, as also the example on MSN 3379. To be noted, anyway, that a physical inspection of the aeroplane may not be required, depending on maintenance history and/or availability of maintenance data. See also the reference to the Airbus mod, which has two targets:

(1) to understand the difference between the Applicability of the AD and the Effectivity of the referenced SB; and

(2) to provide operators with a mean to accomplish the AD without the need of inspecting the aeroplane, e.g., by using a review of maintenance records to show that no interconnecting struts were replaced after delivery, or – if replaced – that no affected part was installed. Since EASA does not enforce (i.e. verify) AD compliance, an operator has to verify with its local (State of Registry) authority the suitability of such approach.



Anyway, the solution proposed by the Commenter is not agreed. It must be clear that operators of affected aeroplanes (to which the AD applies) are required to verify whether an affected part is installed, even if the MSN of an aeroplane is not listed in the Effectivity of SB A320-27-1206 R2 (which is defined by Airbus taking into account the aeroplane configuration at delivery to the first customer). Obviously, the configuration may have changed since delivery. Adding a sentence like "... on which no affected parts have been installed since aeroplane first flight" could be misunderstood as a requirement to check the P/N and S/N of all the parts that have been possibly installed, and later on replaced, during the entire service history of that aeroplane. Obviously, the need for further action is defined by the parts that are actually found installed on the day when the AD action is accomplished. No changes have been made to the Final AD in response to this comment.

Commenter 2: HI FLY – Marta Rodrigues – 14/04/2016

Comment # 2

Just a little repair on Appendix 1: in note 2 it should be written "(see Note 3 below)" instead of Note 4 that does not even exist.

EASA response: Comment agreed, final AD updated accordingly

Commenter 3: United Airlines – Chunying Shen – 10/05/2016

Comment # 3

United Airlines has reviewed the proposed AD (PAD) regarding the Airbus A318, A319, A320 and A321 Flap Interconnecting Strut – Identification/ Modification/ Replacement and would like to offer the following comments.

1. United Airlines has found contradictory requirements reside in this PAD, as well as the Service Bulletins (SB).

The PAD indicates that "SB A320-27-1206 was revised to include a wider range of P/N of affected interconnecting struts." Among the list given in the PAD and the SB A320-27-1206 Revision 02, part number (PN) D57570322000XXX is one of the affected part numbers. Note 1 in the PAD states that "XXX signifies any alpha-numeric combination. It may be possible to find units with only XX".

According to the above, PN D57570322000200 is not affected by this PAD.

However, in the PAD it says "Airbus SB A320-57-1202 has been issued to provide instructions to verify the interconnecting strut P/N, and to update aircraft documentation." And the instruction in the Airbus SB A320-57-1202 Revision 00 tells the operators to make sure that the flap interconnecting strut installed on the airplane is **NOT** PN D57570322000200. This leads to the conclusion that PN D57570322000200 can't be installed.

United Airlines is kindly asking EASA and Airbus review the subject PAD and SBs mentioned above to verify this contradictory and make correction as necessary.

Thank you for your consideration.



EASA response: Comment noted. P/N D5757032200200 is not affected by this AD. It is the P/N installed by MOD 27956. SB A320-57-1202 asks for confirmation that this P/N is not installed, and then documentation can be updated accordingly.

No changes have been made to the Final AD in response to this comment.

