



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-061

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Commenter 1: Hifly – Rui Cavaco – 23/05/2016

Comment # 1

- A. SB A320-28-1221 (currently at Revision No.02) is only applicable to the aircraft MSN listed in PAD Table 1. Consequently, the subject SB should left outside the scope of PAD paragraph (2) as it applies to the aircraft not listed in PAD Table 1. As an alternative, AIRBUS could be contacted before next flight to provide approved FVP replacement instructions instead (as of today, the A320FAM Aircraft Maintenance Manual does not have FVP removal/installation instructions for on-wing procedures);
- B. On the other hand, a NACA duct assembly replacement should also be a driving factor in the context of PAD paragraph (2.1) – this action has impact on the FVP inventory, but such may not be captured by tracking inventory activities (because NACA duct assemblies are not considered traceable, even though they are the FVP's next higher assembly);
- C. In addition, the FVP P/N 786073-1-0 may be restricted to be installed on NACA duct assemblies P/N D2815700100400 and D2815700100500. Counterpart FVP P/N 786-052 may be restricted to be installed on NACA duct assemblies P/N D28150026 (whole series) and D2815700100x00 (except where x is 4 or 5). Maybe this specification could be used to enhance the PAD applicability.

EASA response:

- A. **Comment noted: The SB applicability is defined by Airbus based on aircraft configuration at delivery; due to possible part replacement in service, other aeroplanes may be equipped with affected parts. Even if the SB applicability does not include airplanes listed in Table 1 of the AD, the AD itself allows using the SB instructions to replace, as required, an FVP. An option to contact Airbus for instructions has been added.**
- B. **Comment understood, but not agreed. The AD requires identifying whether an FVP has been replaced. This instruction include “simple” FVP replacement as also replacement of any higher level part including the FVP.**
- C. **Comment not agreed: The AD applicability cannot be modified (reduced) due to the requirement of paragraph (4), applicable to all MSN**

