



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-095

[Published on 23 June 2016 and officially closed for comments on 21 July 2016]

Commenter 1: Air France – Guillaume Jourdain – 07/07/2016

Comment # 1

AFR is studying the PAD 16-095 and found not any grace period. This one should permit to inspect aircraft during a C check. So could you introduce a grace period 24 months from AD issue in order to schedule inspection during C Check.

EASA response: Comments not agreed. It has been confirmed that Airbus provided, upon request, information and advanced instructions (via TA process) in due time to the operators of all affected aeroplanes to ensure compliance with the mentioned thresholds. No changes have been made to the Final AD in response to this comment. See also the EASA answer to Comment #3 and #5 for additional information.

Commenter 2: Virgin America – Krista Dial – 11/07/2016

Comment # 2

References:

/A/ Airbus SB A320-57-1207 Rev 00

/B/ Airbus Dossier 80177661

/C/ EASA PAD 16-095 (Issue date 23-Jun-2016)

The Ref /C/ PAD states that modification of an airplane in accordance with the instructions of Airbus SB A320-57-1207 constitutes terminating action for the repetitive inspections. Virgin America notes the following issues regarding the Ref /A/ SB. Per the Ref /B/ Airbus dossier, these issues will be addressed at the next revision of the Ref /A/ SB.

a. Ref /A/ Section D TEST (Subtask 571207-720-401-001) specifies to do a fuel leak test per AMM Task 28-11-00-790-008. This AMM task does not exist in the May 2016 AMM. The correct AMM task is 28-11-00-790-002.



- b. Ref /A/ Section E Close-Up (Subtask 571207-942-401-001) para (b) specifies "Remove the ground safety locks from the MLG. Refer to AMM Task 32-00-00-410-001." AMM Task 32-00-00-410-001 does not exist in the May 2016 AMM. Should be AMM Task 32-00-00-081-001.
- c. Ref /A/ Section E Close-Up (Subtask 571207-942-401-001) para (e) specifies "Lower the aircraft off the jacks. Refer to AMM Task 07-11-00-581-002." AMM Task 07-11-00-581-002 does not exist in the May 2016 AMM. Should be AMM Task 07-11-00-586-002.
- d. Ref /A/ Section C Subtask 571207-832-401-001 should clearly state that the LH and RH modification can be performed at the same time if no cracks are found.

EASA response: Comments partially agreed. As in the section Ref. publications, any later approved revision of an SB is automatically recognized as acceptable for AD compliance. SB A320-57-1207 original issue does not contain the provision to allow Airbus to provide approved instructions for any deviation discovered during SB accomplishment upon operator request. Paragraph (4) of the Final AD has been amended to take this eventuality into account.

Commenter 3: Qatar Airways – Velluva Veetil Surendran – 18/07/2016

Comment # 3

References:

/A/ EASA PAD 16-095 dated 23/06/2017

/B/ Airbus SB A320-57-1205 R01

/C/ Airbus TFU 57.20.00.028

/D/ Airbus OIT 999.0026/16 R00

Prior to issuance of ref/A/ PAD and ref/B/ SB, the early information from Airbus regarding this emerging issue indicates that the inspection compliance threshold will only be 14,500 FC from aircraft first flight (no FH threshold). This information was communicated by Airbus to operators in ref/C/ TFU and ref/D/ OIT.

However, after the issuance of ref/A/ PAD and ref/B/ SB, all affected A320 aircraft will have a compliance threshold of 14,500 FC or 29,000 FH from aircraft first flight, whichever occurs first.

The introduction of FH compliance threshold in ref/A/ PAD and ref/B/ Airbus SB will significantly impact the remaining compliance time for all Airbus A320 aircraft whose hours to cycle ratio is higher like Qatar Airways aircraft. This restriction of inspection based on Flight hours will result in inspections falling outside of C-checks and will impact our future plans.



In case of crack findings, the estimated downtime is 5 days for each cracked side (LH or RH wing).

In view of the above, Qatar Airways request EASA to;

1. Remove the FH compliance threshold in the final release of EASA AD.
2. If option 1 is not possible, increase the FH compliance threshold to 58,000 (4 FH : 1 FC) in the final release of EASA AD.

EASA response: Comments not agreed. The outcome of the risk assessment does not justify an increase of FH compliance time for the whole fleet. The operator may contact Airbus on case by case basis and depending of their specific use for any eventual increase. No changes have been made to the Final AD in response to this comment.

Commenter 4: Lufthansa Technik – Dennis Geipel – 18/07/2016

Comment # 4

One minor concern: PAD 16-095 Par (1) 'Note' states: "Note: When alternative inspection methods are used, the next interval applicable is the one associated with the inspection method used at the last inspection."

This wording is misleading as it uses the same words ("alternative [...] methods") normally used when referring to an AMOC ("If requested and appropriately substantiated, EASA can approve Alternative Methods of Compliance for this AD. "), which is obviously not the intent of this note.

As this note refers to the change in inspection method approved by SB A320-57-1205 (DET or SDI), we would like to propose a clearer note to avoid misunderstandings:

"Note: In case the inspection methods as per SB A320-57-1205 (DET or SDI) are swapped, the next interval applicable is the one associated with the inspection method used at the last inspection."

In case LHT understanding is wrong, please comment via PAD CRD.

Thank you very much for your kind cooperation and review of our comments.

EASA response:

Comment agreed. Note 1 of the Final AD has been modified accordingly.



Commenter 5: Monarch Aircraft Engineering Ltd – Jim Moore – 08/09/2016**Comment # 5**

With reference to PAD 16-095, Can you confirm if there is going to be any grace period for the compliance time as MAEL provides engineering support for an operator which has an applicable aircraft with FH currently at 28500FH and the compliance time for the PAD and SB is indicating a compliance time of 29000FH.

Will this AD be issued soon, (before this aircraft reaches the compliance time), although our operator is aware of the compliance time and the SB is mandatory at this time the AD has not been published.

EASA response:

Comment agreed. The Final AD has been modified accordingly.

