



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-113

[Published on 27 July 2016 and officially closed for comments on 24 August 2016]**Commenter 1: Austrian Airlines – Erwin Fleberger – 29/07/2016****Comment # 1**

The PAD is inconsistently with SB A320-52-1165 Rev. 02.

PAD requires additional work for acft already modified acc. SB Rev. 00 and Rev.01 whereas SB A320-52-1165 SB Rev. 02 requires additional Work for Aircraft modified by Revision No. 00 only.

Ref. PAD para (9): “For aeroplanes on which, before the effective date of this AD, any part was installed and / or replaced in accordance with the instructions of Airbus SB A320-52-1165 original issue or Revision 01, within 12 months after the effective date of this AD, accomplish the instructions identified as “additional work” in Airbus SB A320-52-1165 Revision 02.”

Ref. SB A320-52-1165 Rev. 02: page 1: “Additional work is required by this revision for aircraft modified by the original issue of this SB” which is also in line with SB Para 1. D., 1.G and 3: “Additional Work for Aircraft modified by Revision No. 00”.

Please clarify PAD or contact the TC holder in order to update SB with additional work for acft modified acc. Rev. 01.

EASA response:

Comments agreed. AIRBUS has issued SB A320-52-1165 rev. 03 to correct the identification. The AD has been amended accordingly.

Commenter 2: Lufthansa Technik – Florian Dietsch – 11/08/2016**Comment # 2**

LHT would like to comment on Paragraph (9) of the PAD:

The instructions of additional work in Rev. 02 of SB A320-52-1165 still only reference on the original issue: “Task 521165-831-896-001: Additional Work for Aircraft Modified by Revision No. 00”. No proper reference on aircraft modified by Rev. 01 is given!



LHT knows at least one example, where this lack of information would cause problems concerning the correct re-identification of the affected parts. An example would be MSN 652. This aircraft was modified as per Rev. 01, where it was config 06. On the R/H side the partnumber changed to D5285600000195. As the config. changed from 6 to 16 with Rev. 02 additional work according the instructions of the PAD would be necessary:



1	Fairing assembly	D528560000100	Item (15)
	or		
1	Fairing Assembly	D5285601001100	Item (15)
	becomes:		
1	Fairing Assembly	D528560000195	Item 15
	or		
1	Fairing Assembly	D5285875100100	Item (15)
	becomes:		
1	Fairing Assembly	D5285875100195	Item 15

DATE: Nov 03/14

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A318/A319/A320/A321

SERVICE BULLETIN

NOTE: Old PN D528560000100 or D5285875100100 is the initial PN before the embodiment of this Service Bulletin at the original issue.

NOTE: Old PN D5285601001100 is the reidentified PN after the embodiment of this Service Bulletin at the original issue.

6 Apply varnish to the identification plate, item 36.

Use

Coating - Flexible
Structure

04QAB2

As required

iet.

There is no instruction given for the case that the part is already labeled as D5285600000195. It is not clear, if there is any partnumber change needed for this P/N or if it is already correct.

Apart of that case, for the majority of the new configurations introduced with Rev. 02 of the SB, there is no difference in the outcome of the re-identification procedure between the Rev. 01 config. and the Rev. 02 one. For example if an aircraft was config. 10 in Rev. 01 and changed to config. 13 in rev. 02, the same partnumber would be labeled in both cases. Performing the “additional work” paragraph implements no change.

Therefore we propose the following:

- Revise SB A320-52-1165 to implement a correct procedure for aircraft modified by Rev. 01 of this SB. It has to be clear in which case rework is necessary.

or

- Specify in the AD a clear way how to proceed with aircraft already modified by Rev. 01 of the SB.

As the “additional work” part of the SB A320-52-1165 was not adapted correctly in Rev. 02 of the SB and still stated “Additional Work for Aircraft Modified by Revision No. 00” operators had no information that rework is also necessary for aircraft modified by Rev. 01 and no proper planning was performed. The new requirement will again generate additional downtime and operational disruptions due to an inadequate work of the OEM and premature SB release.

EASA response:

See answer to comment #1.

Commenter 3: Cathay Pacific Engineering – John Wong – 22/08/2016

Comment # 3

In general we would like to ask for clarifications of PAD 16-113/ Airbus SB 52-1135 REV 02, and also the effective date of the AD. Appreciate if EASA can kindly review the below. Thank you very much.

Clarifications of PAD 16-113/ Airbus SB 52-1135 REV 02

From AISB A320-52-1165 REV02, it is stated that 'Additional work is required by this revision for aircraft modified by the original issue of this Service Bulletin'. Furthermore, in the Accomplishment Instructions section, statement of 'Additional Work for Aircraft Modified by Revision No. 00' is stated in CONF 001 to CONF 018 of this SB A320-52-1165 REV02, while there is no additional work required for CONF 019 and CONF 020.



From the above, Cathay could conclude that:

- For Aircraft which accomplished REV00 of this SB 52-1165, Additional Work stated in SB 52-1165 REV02 is required only if aircraft falls into CONF 001 to CONF 018 of SB A320-52-1165 REV02. If aircraft falls into CONF 019 to CONF 020 of SB A320-52-1165 REV02, additional work is not required.
- For Aircraft which accomplished REV01 of this SB 52-1165 (which only carried out the Modification Work in SB 52-1165 REV01, and have never accomplished SB 52-1165 REV00 nor the 'Additional Work for Aircraft Modified by Revision No.00'), the additional work stated in SB 52-1165 REV02 is NOT REQUIRED.

However, PAD 16-113 has some requirements regarding additional work of AISB SB 52-1165 REV02, which seems contradicts to AISB 52-1165 requirements:

Quote://

(9) For aeroplanes on which, before the effective date of this AD, any part was installed and / or replaced in accordance with the instructions of Airbus SB A320-52-1165 original issue or Revision 01, within 12 months after the effective date of this AD, accomplish the instructions identified as 'additional work' in Airbus SB A320-52-1165 Revision 02.

(10) Modification of an aeroplane in accordance with the instructions of Airbus SB A320-52-1165 Revision 02 constitutes terminating action for the requirements of paragraphs (1) through (5) of this AD for that aeroplane.

// Unquote

From PAD 16-113 Para (9), it states even aircraft have accomplished SB 52-1165 REV01 still needs to carry out the 'Additional work' in SB 52-1165 REV02; while for PAD 16-113 Para (10), only SB 52-1165 REV02 constitutes the terminating action of the AD, but there is no credit provided to aircraft which accomplished SB 52-1165 REV00 (for CONF 019 & CONF 020 in SB REV02 which have no additional work), or to aircraft which accomplished the modification work in SB 52-1165 REV01.

Requests:

A. EASA please review and advise whether Cathay's Conclusions above is correct or not.



B. EASA please review and provide clarifications/ credits regarding the 'additional work' requirements for aircraft accomplished different revisions of the SB A320-52-1165.

Query on effective date of the AD

From PAD 16-113 information, it is noted that the AD does not have a short compliance time requirement.

Request:

C. EASA please review and extend the effective date of the AD from 14 days to 30 days after AD issue date.

EASA response:

Comments 3A and 3B: Cathay Pacific conclusion is partially correct: see answers to comments #1 and #2.

Comment 3C: Comment not agreed. No changes have been made to the Final AD in response to this comment.

Commenter 4: Aegean– Theodoros Paitazoglou– 02/09/2016

Comment # 4

Aegean has reviewed Proposed AD (PAD) no. 16-113 since it operates A320F aircraft affected by AD 2015-0001R1. We would like a clarification regarding paragraph 9 in which it states :

Quote

“For aeroplanes on which, before the effective date of this AD, any part was installed and / or replaced in accordance with the instructions of Airbus SB A320-52-1165 original issue or Revision 01, within 12 months after the effective date of this AD, accomplish the instructions identified as “additional work” in Airbus SB A320-52-1165 Revision 02.”

Unquote



However, the instruction identified as ‘additional work’ in SB A320-52-1165 R02 (Task 521165-831-896-001) is entitled “ Additional work for Aircraft Modified by Revision No. 00 “ Given that several of the aircraft operated by Aegean have already performed SB A320-52-1165 Rev. 01, thus are affected by this paragraph, could you please advise on the action to be taken in order to show compliance with this requirement?

EASA response:

See EASA answers to comments #1 and #2.

Commenter 5: SIA Engineering Company – Eugen Chan– 18/10/2016

Comment # 5

Para (9) and (10) of PAD 16-113 states the following:

(9) For aeroplanes on which, before the effective date of this AD, any part was installed and / or replaced in accordance with the instructions of Airbus SB A320-52-1165 original issue or Revision 01, within 12 months after the effective date of this AD, accomplish the instructions identified as “additional work” in Airbus SB A320-52-1165 Revision 02.

(10) Modification of an aeroplane in accordance with the instructions of Airbus SB A320-52-1165 Revision 02 constitutes terminating action for the requirements of paragraphs (1) through (5) of this AD for that aeroplane.

We have clarified with Airbus through TechRequest and they confirmed that no additional work is required for aircraft in Config 0020 (of SB A320-52-1165 Rev 02) modified by SB A320-52-1165 Rev 00.

Therefore, should para (9) and (10) be re-worded such that aircraft in Config 0020 (of SB A320-52-1165 Rev 02), which were modified by SB A320-52-1165 Rev 00, need not accomplish the additional work?

EASA response:

Comment agreed: reference to SB A320-53-1165 rev 03 is included in the AD. This SB clarifies the work configuration 020. See also EASA answer to comment #1.

