



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-118

[Published on 05 August 2016 and officially closed for comments on 02 September 2016]

Commenter 1: Austrian Airlines – Thomas Ebert – 09/08/2016

Comment # 1

The somehow complex wording of PAD Para 1 seems to provide a grace period for acft already above the thresholds acc. PAD appendix 1. Considering human factors we suggest to include a table providing the relevant values instead of referring to 3 different documents.

EASA response:

Comments agreed. AD paragraph 1 wording simplified: Based on the fact that this AD effective date is not before the August 17, 2016 – special compliance time provided at ALS Part 2 R03 that could have been applied by operators as necessary – that special compliance time is considered overdue and no more reflected in this AD. AD Appendix has been updated to specifically provide special compliance time only when applicable.

Commenter 2: Lufthansa Technik – Dennis Geipel – 10/08/2016

Comment # 2

A) PAD Par. (2) states “Inspections on an aeroplane, accomplished per ALI task 534129 or task 534130 before the effective date of this AD are acceptable to comply with the requirements of paragraph (1) of this AD for that aeroplane. After the effective of this AD, repetitive inspections must be continued as required by paragraph (1) of this AD.”

Since inspections programs per AD 2016-0015 have been set up, and A/C have been inspected in accordance with those instructions, those inspections should be considered acceptable to comply with the requirements of paragraph (1). Therefore, we would like to ask for Par. (2) update:

“Inspections on an aeroplane, accomplished per ALI task 534129 or task 534130 or per EASA AD 2016-0015 before the effective date of this AD are acceptable to comply with the requirements of paragraph (1) of this AD for that aeroplane. After the effective of this AD, repetitive inspections must be continued as required by paragraph (1) of this AD.”



B) PAD Par. (7) states, concerning re-inspection of repaired holes: “For an aeroplane that has been inspected per ALI task 534129 or task 534130 and repaired, before 29 January 2016 [the effective date of EASA AD 2016-0015], [...]”. As this applies as well to repairs carried out as per EASA AD 2016-0015, after 29 JAN 2016, this Par. should to our mind read:

“For an aeroplane that has been inspected per ALI task 534129 or task 534130 and repaired, before 29 January 2016 [the effective date of EASA AD 2016-0015], or for an aeroplane that has been inspected per EASA AD 2016-0015, and repaired, before effective date of this AD, [...]”

C) For PAD Par. (8), same comment 3/ applies, as the modification of the four fastener holes at door stop locations where no damage or cracks was detected constitutes terminating action, if carried out per EASA AD 2016-0015 instructions:

“For an aeroplane that has been inspected per ALI task 534129 or task 534130 and repaired, before 29 January 2016 [the effective date of EASA AD 2016-0015], or for an aeroplane that has been inspected per EASA AD 2016-0015, and repaired, before effective date of this AD, [...]”

D) PAD Par. (11) and (12) still refer to ALS tasks 534129 and -30, which have been deleted with ALS Part 2 Rev. 05 issued JUL 08/16.

Thus, we are wondering, why the AD still “supersedes” or “cancels” those tasks, that have already been deleted and whose accomplishment is forbidden as per PAD Par. (2):

“[...] After the effective of this AD, repetitive inspections must be continued as required by paragraph (1) of this AD.”.

Those paragraphs could to our mind be removed from the AD, keeping the AD as simple as possible.

EASA response:

A) Comment noted. AD 2016-0015, paragraph (1), requires inspection in accordance with SB A320-53-1288, consequently the wording “unless accomplished previously” covers this case. No changes have been made to the Final AD in response to this comment .

B) Comment agreed. AD has been changed.

C) Comment agreed. AD has been changed.

D) Comment noted and partially agreed; ALS Part 2 Rev 5 implementation is not yet mandatory for all affected aeroplanes. A note has been added in the AD.



Commenter 3: United Airlines – Neil Sorensen – 18/08/2016**Comment # 3**

PAD Paragraph (4) requires SB A320-53-1288 inspection again as per Table 1 and Appendix 1, after modification per SB A320-53-1290. If SB A320-53-1288 is accomplished after modification per SB A320-53-1290, there would be discrepancy with the fastener removal and installation instruction. SB A320-53-1288 assumes the fasteners/holes are not modified and do not specify the oversized fasteners in SB A320-53-1290. Please clarify that a post SB A320-53-1290 aircraft inspection per A320-53-1288 would allow same fastener installation as SB A320-53-1290.

EASA response:

Comments noted. The same inspection principle applies for post SB 53-1290 configuration. No terminating action is considered at current stage by Airbus because of limited number of aeroplane that may be impacted by this paragraph . No changes have been made to the Final AD in response to this comment

Commenter 4: Cathay Pacific Airways – Aine Cloney – 02/09/2016**Comment # 4**

A) In the Appendix 1 Table 1 and 2 “aeroplanes affected” column, the mod relationship is not clear when 2 mods are mentioned. Suggest to add “AND” as clearer indication.

(e.g. A320 pre mod 16001 **AND** pre mod 160080)



Appendix 1: Door Stop Fitting Holes – Inspection / Repair Threshold and interval

Table 1 - Aft passenger/crew door cut-out
Door stop fittings holes at FR 66 WEB LH/RH

Aeroplanes affected	Threshold	Interval
A318-PAX	33 800 FC	5 900 FC
A319-PAX pre mod 160001 pre mod 160080	42 700 FC	7 500 FC
A319-PAX post mod 160001 OR A319-PAX post mod 160080	40 300 FC	7 200 FC
A320 pre mod 160001 pre mod 160080	48 000 FC	9 700 FC
A320 post mod 160001 OR A320 post mod 160080	45 500 FC	7 800 FC
A321 pre mod 160021	34 500 FC	17 000 FC
A321 post mod 160021	39 400 FC	8 500 FC

B) The PAD has two Table 1's, please consider to use different table numbers to avoid confusion.

C) PAD Para 5 is redundant and can be deleted to make the AD more simple. SB 53-1288 already has instruction to carry out SRM repair if crack is found, Airbus will be contacted if the damage is out of the SRM allowable limit.

D) Believe PAD Para 11 has typo:

...as required by paragraph (1), (4) or (7) **or** this AD..., should be

...as required by paragraph (1), (4) or (7) **of** this AD...



E) Why was AD 2016-0015 released before all the information was ready? It was known that the inspection requirement values they were not the final values. At the time ALS tasks were in place, which would have captured the inspection requirements at the same or lower intervals than the SB. Even this PAD is proposing to mandate values coming from revision 01 of SB 53-1288 which is not yet released.

F) It says in the PAD that since AD 2016-0015 was issued, ALS Part 2 Rev 04 was published. This is not the case as the ALS document was published in December and the AD was published in January. The Latest ALS revision should be referenced and explained. It is very confusing as per this PAD one would believe that these ALS Tasks are still valid, however per the latest ALS revision they have been deleted. The deletion of these tasks makes paragraphs (11) and (12) invalid. Therefore, can the PAD be revised to include details of ALS Part 2 Rev 05, and explain that tasks 534129 & 534130 have been deleted, why they have been deleted and what the intention of their deletion.

G) Is this PAD, paragraph (1), confirming that for the inspections, per Appendix 1, which are close to, or already, overdue, that the special compliance times in ALS part 2 Rev 04 can be used for the corresponding inspection required per Appendix 1? If so the statement "To determine the next due inspection, the compliance times as defined in the compliance time page of ALS Part 2 Revision 04 are applicable" could be improved by explaining that this is to provide an implementation grace period where required.

H) What is the reasoning for including the statement "without exceeding the requirements of ALS Part 2 Revision 03 and compliance time in the compliance time page of ALS Part 2 Revision 03." why can revision 04 not be the sole source for compliance times?

I) Per paragraph (3) cold work SB 53-1290 is presented as "an alternative to continued inspection as required by paragraph (1) of this AD", this statement suggest terminating action. However, embodiment of this modification initiates its own repetitive inspection requirements.

L) Per paragraph (4) the inspection threshold after cold work is determined by table (1) can you confirm that the column "FC accumulated at time of optional cold working", comprises of values which represent aircraft life from first flight in FC? i.e. less than 1,800 FC from first flight. If that is the case, what is the situation is being pre-empted? In what circumstance is it anticipated that this cold work modification, SB 53-1290, would be carried out at less than 1,800 FC since first flight, considering the lowest threshold of the roto test inspection is 24,400 FC for A321 pre mod 160021. Or is the intention of this table header to mean the FC accumulated from the initial SB A320-53-1288 inspection/Initial accomplishment of ALI inspection.



Table 1 – Inspection Threshold after Cold Working

FC accumulated at time of optional cold working (Airbus SB A320-53-1290)	Compliance Time
Less than 1 800 FC	As defined in the Appendix 1 of this AD
1 800 FC or more, but less than 13 800 FC	Before exceeding 48 000 FC since aeroplane first flight
13 800 FC or more	Before exceeding 60 000 FC since aeroplane first flight

M) For aircraft which fall under the category of "13,800 FC or more" per paragraph (4), when referring to the table in SB 53-1288, this condition does not have any repetitive inspection requirement. However, per the body of paragraph (4) this category is subject to "intervals not to exceed those defined in the Appendix 1 of this AD". Why is this the case?

N) Appendix Table 1 and 2 are introducing different threshold/interval control at two frame locations. In fact, we will perform the inspection of two frames together at the same input using the most stringent compliance time. The different threshold/interval will give no benefit to us but confusion. Suggest to align the inspection threshold/interval for the two different frames.

O) The PAD proposes the effective date is 14 days after the AD issue date, please consider to extend it to 30 days giving us enough time to setup the documentations, settle the planning and inventory actions.

EASA response:

Copy the response to comment #4 here

- A) Comments agreed. AD has been changed.**
- B) Comments agreed. AD has been changed.**
- C) Comments not accepted. No changes have been made to the Final AD in response to this comment**
- D) Comment agreed. AD has been modified.**
- E) Comment noted. Previous AD was necessary as some aeroplane had already reached the original thresholds. No changes have been made to the Final AD in response to this comment**
- F) Comments noted Refer answer to comment #2 D**



- G) Comments noted Refer to answer comment #1.*
- H) Comment agreed. refer answer to comment #1*
- I) Comments noted. MSB 53-1290 has a Window Of embodiment that is indicated in paragraph (4) of this AD. No changes have been made to the Final AD in response to this comment.*
- L) Comments agreed. The FC values are counted from first flight. This table covers all possible cases for MSB embodiment to ensure airworthiness for current DSG and ESG defined values.*
- M) Comments noted. Refer to comment #3 current Airbus ESG high FC value is 60.0000FC. Therefore, there is no need for repetitive inspections as per definition.*
- N) Comments noted. No changes have been made to the Final AD in response to this comment .*
- O) Comments not agreed. No changes have been made to the Final AD in response to this comment.*

Commenter 5: SAS – Kim Gunnarsson – 09/09/2016

Comment # 5

According to PAD 16-118 Appendix 1, the threshold for inspection of A321 (pre mod 160021) has dropped significantly compare to the current threshold stated in SB A320-53-1288.

SAS has almost reached the 24400FC (A321 pre mod 160021) stated in PAD 16-118 Table 2 and our question is:
Will EASA include a “grace period” for Appendix 1 in 2016-0015 revision 1?

EASA response:

Comments noted. Grace period is defined in ALS part 2 revision 4 that applies. Refer to comment #1.

