



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-034

[Published on 20 March 2017 and officially closed for comments on 17 April 2017]

Commenter 1: Sabena Aerospace – Paul Puttevils – 21/03/2017

Comment # 1

In the appendix 1 configuration 7 (A321) the modification 2129P1547 is not embodied during production. However in the Airbus SB 57-1178-Rev. 03 is stated that the Mod 2129P1547 (Config 007) is embodied in production. Please verify the data.

EASA response:

Comment noted. Airbus confirmed that SB A320-57-1178 rev. 3 will be updated at next revision opportunity, aligning config 7 definition with the content of the AD. To be noted that SB Rev 2 definition for Config. 7 is consistent with the AD. See also Airbus SBIT 17-0025 Rev 00 dated 10 may 2017. No changes have been made to the final AD in response to this comment

Commenter 2: Cathay Pacific Airways – Jimmy Cheng – 27/03/2017

Comment # 2

A) AD should become effective as a standard of 30 Days accounting from the issue date in lieu of 14 Days to provide sufficient time for operators to take appropriate action.

B) For Appendix 1 of PAD 17-034, there is a discrepancy for the “Airbus Mod embodied in production / SB embodied” for Config 7 between the PAD Appendix and SB-A320-57-1178 REV 03 Appendix 3. PAD 17-034 stated that it is applicable to A321 aircrafts that have no Mods embodied, whereas SB-A320-57-1178 REV 03 is for A321 (ST2) aircrafts with MOD 2129P1547 embodied only. Please can EASA clarify which between the PAD and SB is correct. This may contradict with the Applicability section of the PAD.

EASA response:



2A) Comment not agreed. Extending the interval to 30 days would require a consistent reduction of the compliance time. The date of effectivity must not be considered as a grace period but is a pure administrative allowance.

2B) Comment noted. Refer to EASA answer to comment #1.

No changes have been made to the final AD in response these comments.

Commenter 3: Lufthansa Technik – Florian Dietsch –13/04/2017

Comment # 3

A) Applicability: Is MOD 160000 correct for the A319 and A320 equipped with sharklets, or should it be MOD 160001 (as stated in SRM for example)?

B) Table 1: The grace periods given in column B are rather short if you consider that Airbus gives material leadtimes of 180 days (Config. 2) and 90 days (Config. 3,5,6,7 and 10). For Config. 2 the period of 180 days is half of the entire grace period of 12 months. This will bring operators in trouble if more aircraft have to be inspected, as the accomplishment of SB A320-57-1178 needs a longer downtime. For Config. 3,5,6,7 and 10 the situation is more critical, as 90 days material leadtime is almost the time of the grace period (4 MTHS).

C) Table 1: Additionally we would like to request for Config. 3,5,6,7 and 10 in column B to insert “from AD effective date” after the dates, FC and FH (similar to Config. 2).

D) Table 2: Column B is not needed in our opinion, as column A gives an interval for the repetitive inspection with enough time to plan.

E) Paragraph 6 and Note 3: We would like to request that Airbus is investigating possible concessions with impact on the SB as well as RDAS, which were raised before and that these deviations are implemented into the SB. This will help operators to plan ahead instead of risking a work stoppage due to a discovered deviation during SB accomplishment.

F) Appendix 1: Config. 4 should be mentioned with a “not applicable” note.

Please don't hesitate to come back to us if any questions arise.

EASA response:

3A) Comment noted. Applicability of both MODs is identical. MOD 160000 is used for this subject as more related to CWB modification.

3B) Comment noted. It is AIRBUS responsibility to ensure and improve availability of parts

3C) Comment agreed. AD has been updated accordingly.

3D) Comment not agreed. Due to the reduction of the inspection interval, the compliance time may be needed for an aeroplane.



3E) Comment noted.

3F) Comment agreed. AD has been updated accordingly.

No changes have been made to the final AD in response to comments 3A, 3B, 3D, 3E

