



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-035

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

### Commenter 1: Emirates Airlines – Adil Simou – 21/03/2017

#### Comment # 1

##### References:

Ref/A/: PAD 17-035 (Issue date: 20 March 2017)

Ref/B/: Mod 28162, 28238 and 28342

Ref/C/: SB A320-53-1267 / SB A320-53-1272 (Mods)

Ref/D/: EASA AD 2014-0081 (dated 31 March 2014)

Ref/E/: MSN:04822 ("Corporate Jet")

##### Background:

- Ref/A/. PAD 17-035 is effective to Airbus A319-115, all manufacturer serial numbers, except aeroplanes on which mod 28162, 28238 and 28342 have been embodied ("Corporate Jet").
- Ref/E/. MSN:04822 ("Corporate Jet") is post Mod 28162, 28238 and 28342 and therefore Not affected by Ref/A/.
- Ref/A/. Expected AD (PAD 17-035) retains the requirements of Ref/D/.EASA AD 2014-0081 (dated 31 March 2014), which is superseded, and introduces additional compliance times for those actions.

##### Desired Action:

1. EASA Safety Information Section is requested to clarify / confirm all actions per Ref/D/.EASA AD 2014-0081 (superseded) are No more required for Airplanes Post Mod 28162, 28238 and 28342 ("Corporate Jet").



2. Airbus Airworthiness Office is requested to confirm Ref/C/.SB A320-53-1267 / A320-53-1272 Rev 00 (Mods) are Not effective to Airplanes Post Mod 28162, 28238 and 28342 (“Corporate Jet”) and that these two SBs will be revised to exclude (“Corporate Jets”) from the Effectivity list.

A positive response from (EASA Safety Information Section) and (Airbus Airworthiness Office) at or before 20 April 2017 will be highly appreciated.  
Thanks for the continuous support.

***EASA response:***

***Comment noted. The Final AD is not applicable to Airbus A319, while AD 2014-0081 will be no longer effective on the effective date of the new AD. Consequently, action previously required on A319 CJ are no longer required by EASA AD.***

***Airbus informed the SB may be revised at next revision opportunity, removing A319CJ from their effectivity.***

***No changes have been made to the final AD in response to this comment.***

**Commenter 2: Cathay Pacific Airways – Jimmy Cheng – 28/03/2017**

***Comment # 2***

2A) CPA would like to request for the effective date to be 30 days in lieu of 14 days in general to provide sufficient time for operators to take appropriate action. CPA acknowledges EASA’s previous response, mentioning that based on the PAD issuance, operators have adequate time between PAD issuance date to the effective date of the actual AD for preparation. However, from experience, PAD no doubt is an alert for operators, but in reality, this cannot be accounted as “time given” for operators to prepare due to:

- i) The requirements of the actual AD can differ from the PAD, which means a proper review of the AD would still be required when released. ALL necessary documents have to be issued/reissued to reflect these new AD requirements.
- ii) There are cases where the AD mandated SB are not issued yet at the time of PAD or even AD effective date. For these similar cases, operators do not have anything to prepare with.
- iii) Some AD do not have PAD for consultation in advance
- iv) Sufficient time should be provided based on the fact that AD in general are becoming more complex, and operator would appreciate that sufficient time is provided in order to process these Airworthiness requirements.



Therefore please can EASA consider extending the standard of 14 days to 30 days.

2B) For PAD 17-035 Paragraph 3, does this mean any modification accomplished per SB-A320-53-1272 and SB-A320-53-1267 (Any Revision) prior to reaching the window of embodiment, would require a dedicated inspection program when the utilization exceeds 60000FC since aeroplane first flight? Or will there be alternate requirements prior to reaching 60000FC? And would this still terminate the ALS Part 2 Task for these aircrafts per Paragraph 6 and 7?

**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) WoE is introduced to satisfy Part 26 WFD requirement. No action is due before maintenance program publication trigger (MPPT) of 60000 FC for the modified aeroplane.**

**Depending on the FC accumulated when the SB has been accomplished, different requirement may be applicable but not prior reaching 60000 FC.**

**Therefore paragraph (3) requires contacting AIRBUS for further instructions. Actions will be defined on case by case.**

**Modification, as required by para (1) and (2), as applicable, cancel the need to accomplish ALS part 2 tasks (as listed in the AD).**

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

**Commenter 3: United Airlines – Neil Sorensen – 12/04/2017**

**Comment # 3**

3A) Please elaborate on the background reasoning for changing the modification threshold. How did the WFD analysis conclude that flight hours are no longer factored into the compliance time? And why do non “sharklet” aircraft only impose a “window of embodiment”?

3B) Regarding Paragraph (3), the preferred method would be to incorporate corrective action instructions directly into the AD. Since this would be a known condition without unique modification or repairs, the analysis would presumably provide what actions are necessary, such as post-mod inspection requirements. Please consider adding the required actions in lieu of “contacting Airbus” to reduce delays incorporating the required maintenance program changes.

3C) Regarding Paragraph (4), why is it necessary to include ALI 534126-01-3 corrective action instructions for this AD? The difference between ALI corrective actions exceeding 46,400 flight cycles versus ALI corrective actions prior to 46,400 flight cycles is not understood. If it relates to ALI repairs



prior to the modification, SB A320-53-1267 already contains instructions to “contact Airbus if previous repairs are in the vicinity of the modification area, 250 mm (10 inches)”. Therefore repairs should be addressed prior to the SB modification regardless of when the repair (due to ALI 534126-01-03 or other damage) occurred. We propose to omit this paragraph due to these reasons.

***EASA response:***

***3A) Comment noted: For more details please contact AIRBUS.***

***3B) See EASA response to comment 2B***

***3C) Comment agreed. AD is updated accordingly.***

***No changes have been made to the final AD in response to comments 3A and 3B.***

