



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-086

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**Commenter 1: Lufthansa Technik – Dennis Geipel – 28/07/2017**

### Comment # 1

Upon reviewing PAD 17-086, we identified a discrepancy between ALS Part 2 Rev. 06 task 531103-01-1 and upcoming Airbus SB A320-53-1339.

§(1) of this PAD mandates full compliance to ALS Part 2 Rev. 06.

Revised Task 531103-01-1 of this document mandates the “SPECIAL DETAILED INSPECTION (ROTO) OF FWD PASSENGER/CREW DOOR CUTOUT, STOP FITTINGS HOLES ON FR16 AND FR20, LH/RH” at a threshold of 30.000FC (ALS Part 2 Rev. 06 Appendix E Section 3 Change Description: “Threshold changed from "48000 FC" to "30000 FC". Applicability changed from "A319-PAX OR A320-CEO OR A321" to "A318-PAX OR A319-PAX OR A320 OR A321".”).

However, upcoming Airbus SB A320-53-1339 (expected to be classified mandatory) states “The aim of this ISB is to cancel and supersede ALI 531103-01-1 in order to better address this issue in proposing repair solutions and a final fix through Service Bulletin No. A320-53-1330.” (SB 53-1339 §1.C.(3)).

We are questioning why PAD 17-086 does not take into account those changes.

Without a related note in PAD 17-086/ the related EASA AD, SB A320-53-1339 cannot be applied as an approved substitute for ALS 531103-01-1 at a threshold of 30.000FC.

Furthermore, without a note, operators must comply to ALS 531103-01-1 as per PAD §(1) meaning that all door stop fittings must be inspected at 30.000FC, even if latest TC holder information confirms that only door stops #1 and #7 must be inspected at 30.000FC.

This leads us to the conclusion that the inspection threshold of the other door stop fittings #2 to #6 can from a technical point of view remain at 48.000FC (as per former ALS Part 2 Rev. 05).

LHT Requests:

Please review the before stated discrepancy. We would like to propose the following solutions to inspect the door stop fittings in accordance with the latest manufacturer information provided through SB A320-53-1339:



1/ Adding a Paragraph into PAD 17-086/ the related EASA AD, that “accomplishment of Airbus SB A320-53-1339 is acceptable to comply with ALS task 531103-01-1 for door stop fittings #1 and #7. Other door stops fittings #2 to #6 are to be inspected as per ALS Part 2 Rev. 05 task 531103-01-1”.

2/ If negative to 1/:

Release of an EASA AD to mandate SB A320-53-1339 prior to release of this AD.

This will make sure that ALS Part 2 Section 1 §7 applies (Supersedure of ALS tasks through EASA AD).

3/ If negative to 2/:

Release of a Variation to ALS Part 2 Rev. 06 correcting task 531103-01-1 and/or adding a new task for the locations not covered by SB A320-53-1339 prior to release of this AD.

However, for all options, please keep in mind that the reduction in threshold causes a significant burden to legacy fleet operators due to the special compliance time of MAY 31/18. Therefore, our preferred option is 1/, as we consider it the fastest way to start off with the inspections and show compliance to the ALS requirements.

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

***EASA response:***

***Comment agreed. The AD has been modified including reference to ALS Part 2 variations up to 6.3, and to Airbus Sb A320-53-1339***

