



COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-140

[Published on 06 October 2017 and officially closed for comments on 03 November 2017]

Commenter 1: Aer Lingus – Dan Kavanagh – 06/10/2017

Comment # 1

Paragraph 5 (One time inspection) states – “For aeroplanes on which the THSA has been replaced since Airbus date of manufacture, within 6 months after the effective date of this AD, accomplish a detailed inspection of the THSA lower attachment in accordance with the instructions of Airbus AOT A27N010-17”.

EIN believe the term “replaced” is misleading and this paragraph should account for aircraft on which the THSA has been removed/installed for any reason.

EASA response:

Comment agreed – the final AD has been updated accordingly

Commenter 2: Cathay Pacific Airways Limited – Dicky Or – 11/10/2017

Comment # 2

The new requirement of one-time inspection in para (5) asks operator to perform a detailed inspection iaw AOT A27N010-17 for a/c which THSA has been replaced since DOM, however it does not mention the cut-off date for this requirement, literally any future THSA replacement are applicable to this requirement.

We consulted Airbus before and confirm the intension of AOT A27N010-17 has been incorporated in AMM May-2017 revision, therefore THSA replaced after that will be satisfied with the inspection requirement by AMM.

Based on above, we suggest the AD should state specifically para (5) is applicable for THSA that has been replaced before May-2017 only.



EASA response:

Comment agreed – the final AD has been updated accordingly, adding credit paragraph (12) to mention AMM task 27-44-51-400-001 from rev May 2017.

Commenter 3: Air Canada – Stephane Perron – 11/10/2017
Comment # 3

3A) As per our interpretation of the PAD 17-140, the installation of the ELSD does not constitute a terminating action for the paragraph 1 and 2. The paragraph 2 requires an inspection of the upper THSA attachment and the secondary load path inspection as per SB A320-27-1164 revision 10. The revision 10 of the SB A320-27-1164 does not contain instructions to inspect aircraft equipped with the ELSD system. However the revision 12 (and later) of the SB A320-27-1164 contains specific instructions to inspect the secondary load path of aircraft that have THSA equipped with ELSD. This said we believe more effective and potentially avoid confusion to specify the latest revision of SB A320-27-1164 which is currently revision 13.

3B) For the New requirements of this AD Air Canada is proposing to add a note to clarify the intent:

(5) Within 6 months after the effective date of this AD, accomplish a detailed inspection of the THSA lower attachment in accordance with the instructions of AOT A27N010-17.

NOTE: If THSA was installed as per AMM revision May 2017 (or later) this constitute a terminating action for the aforementioned AOT.

Reason: Since May 2017 AMM revision includes the AOT 27N010-17 requirements in the instructions to inspect for the gaps is included in the AMM Task 27-44-55-400-001-A Final Inspections.

EASA response:

3A) Comment agreed. The final AD has been updated to require using SB A320-27-1164 Revision 13. The credit paragraph (13) has been added for inspections accomplished using previous revisions of this SB. To clarify the last paragraph of Reason Section has been amended and the Note 1 has been added to inform that paragraphs (1) to (4) were previously required by the superseded AD 2014-0147, using SB A320-27-1164 revision 10.

3B) Comment agreed - See EASA Answer to comment 2



Commenter 4: Air New Zealand – Nathan Rusbatch – 12/10/2017**Comment # 4****Observation:**

1. The proposed AD has three sections: 1) The repetitive inspections IAW SB A320-27-1164; 2) The one-off inspection IAW AOT A27N010-17 and; 3) The ELSD modification IAW SB's 27-1245, 27-1246, 27-1247 & 27-1248.
2. The repetitive inspections IAW SB A320-27-1164 and the ELSD modification are related to the failure of the THSA to jam when the secondary load path is engaged., however the ELSD modification provides no terminating action for the repetitive inspections.
3. The one off inspection IAW AOT A27N010-17 is unrelated to the failure of the THSA to jam when the secondary load path is engaged.

While technically there is no issue with the PAD, combining the three sections into one large AD has the potential to:

1. Result in messy/confusing compliance reporting, due to the high number of controlling paragraphs.
2. Result in an increased number of revisions to the document, due to new revision being required if EASA makes changes to any of the three sections.

Summary:

When drafting PAD 17-140, did EASA consider the following:

1. Retain AD 2014-0147 in effect.
2. Create new AD to mandate the installation of the ELSD to the THSA.
3. Create new AD to mandate the one-off inspection IAW AOT A27N010-17.

From the operators perspective, the above is a more orderly way of approaching the different requirements listed in PAD 17-140.

EASA response:

Comment noted. EASA did consider initially a similar approach as the one suggested by this comment, but finally decide to combine all the requirements in one AD, mainly aiming at avoiding numerous ADs.

The element having forced EASA decision is that, at the current stage, this AD is 'already' expected to be once more reworded as Airbus is working on new inspection regime for aeroplane fitted with ELSD. Upon EASA review and agreement with the Airbus new proposition, an update of this AD can be expected. In the meantime, EASA agree that the ELSD installation does not provide any benefit with regards to the repetitive inspection requirements.

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



Commenter 5: Croatia Airlines – Hrvoje Mičuga – 13/10/2017**Comment # 5**

5A) We are reviewing the PAD 17-0140 and the thing that is a bit confusing is the requirement for accomplishment of inspection i.a.w. AOT A27N010-17. This inspections should have been performed before the September 27, 2017 as required by Airbus. According to the PAD, this inspection has to be performed again. Could you please explain the following paragraph:

"One-Time Inspection:

(5) For aeroplanes on which the THSA has been replaced since Airbus date of manufacture, within 6 months after the effective date of this AD, accomplish a detailed inspection of the THSA lower attachment in accordance with the instructions of Airbus AOT A27N010-17. "

My understanding of this is that any aircraft on which THSA has been replaced in service should be checked for correct installation. Since we (CTN) have already performed the inspection, we have this requirement covered (for now), but this AD states that the inspection has to be performed after the effective date of this AD which does not make it "one time inspection". Also, Airbus AMM has been updated (May 2017 revision) to check for correct installation of THSA after installation (proper gap required by AOT). We will perform two inspections for administrative reasons (AD will be issued after AOT).

5B) Airbus has mentioned some MP changes regarding inspection of lower and upper attachments in their documentation covering this modification (SBs, TFU,...), but I do not see it (longer period between inspections), thresholds for inspections are the same according to this PAD. Is there a plan for this?

One last question: do you/they plan terminating action for the problems with the THSA?

EASA response:

5A) Comment not agreed - The actions required by the AD are “required as indicated, unless accomplished previously”, as stated at the beginning of the “Required Action(s) and Compliance Time(s)” section of the AD. Consequently, the inspection accomplished in accordance with the instructions of Airbus AOT A27N010-17 before the effective date of the AD is acceptable and sufficient to meet the compliance with the inspection requirement of paragraph (5). No changes have been made to the Final AD in response to this comment.

5B) Comment noted - see EASA answer to comment 4.



Commenter 6: Hainan Airlines – Shawn – 18/10/2017**Comment # 6**

CHH would like the due date of this one-time inspection for THSA to be prolonged from 6 months to 1 year, considering of THSA spare part in CHH stock in case of positive finding.

EASA response:

Comment not agreed. The proposed compliance time is not supported by the airworthiness analysis.. No changes have been made to the Final AD in response to this comment.

Commenter 7: Lufthansa Technik AG – Jens Wiedau – 24/10/2017**Comment # 7**

While reviewing the PAD 17-140 some subjects have been identified which should be improved. LHT on behalf of several European operators kindly requests the EASA/Airbus to take the following comments into account for the AD publication:

7A) LHT kindly request the EASA/Airbus to remove the AOT A27N010-17 from this AD, as it is a total separate issue and should be treated accordingly. This ensures the content of this AD is less complex which would avoid human errors!

Please have in mind this PAD is corresponding to six different documents five SB's and one AOT, which makes it quite complex!

7B) As per LHT information the installation of the ELSD is the terminating action of this AD inspection requirement, provided the by Airbus announced new CMR inspection Task is in place. In order to avoid unnecessary additional work load the existing EASA AD 2014-0147 should be revised first if the mentioned CMR inspection Task has been finally published, otherwise the upcoming AD needs to be revised or a further new AD needs to be published!

If the origin of this new AD is mainly based on the intention to inform the operators about the 4 years compliance time for the ELSD installation resp. activation, LHT prefers to wait for the announced CMR inspection expected to be available end of this year! This is based on the fact almost every operator interested in the A320 product is aware either by the OIT-999-0138-16-00 or by the A320 Family Symposium held in Berlin this year and the SB A320-27-1248, about the mandate and roughly about the related compliance time expected!

Consequently an additional AD for this information is in my point view not justified!



7C) If this AD will be published nevertheless, it should be clearly stated in that AD if the THSA replacement has been performed iaw. AMM 27-44-51-400-001-A Rev May. 2017 the inspection iaw. the AOT A27N010-17 is not required anymore. This is based on the fact the AOT inspection requirement was incorporated in afore mentioned AMM task by this revision!

EASA response:

7A) Comment noted - See EASA Answer to comment 4

7B) Comment noted - See EASA Answer to comment 4, and consider that EASA decided to issue this AD without any more delay as the schedule foreseen is already subject to postponements..

7C) Comment agreed - See EASA Answer to comment 2

Commenter 8: United Airlines – Chloé Shen Morosetti – 30/10/2017

Comment # 8

This EASA PAD requires a one-time detailed inspection of the THSA lower attachment in accordance with the instructions of Airbus AOT A27N010-17 within 6 months after the effective date of this AD.

AOT A27N010-17 was issued on 27 March 2017. Within 6 months of the issue date of the AOT, United Airlines has completed the inspection on all classic UAL A319s and A320s and the ex-CSN A319s. The inspection will be scheduled during induction when upcoming ex-CSN A319s and A320s are inducted. We should be able to take credit of the inspection that has been completed.

Therefore, United Airlines suggests adding the following statement in section Credit paragraph (11):

An aeroplane on which Airbus AOT A27N010-17 has been accomplished is considered compliant with paragraph (5). A review of aeroplane maintenance records is acceptable provided that the records can be relied upon for this purpose.

EASA response:

Comment is not agreed - See EASA Answer to comment 5



Commenter 9: Air France – Olivier Nempont – 02/11/2017

Comment # 9

9A) Administrative Comments:

1. On page 2:

“Required Action(s) and compliance time(s):

Required as indicated, unless accomplished previously:”

2. On page 3:

“the §(5) without the information of accomplishment of the AOT A27N010-17 unless if already performed”.

I understand that your comment from point 1 indicates that the AOT is not to be performed again after the effective date of the AD.

9B) Technical comments :

By § (9), it is mandatory to activate the ELSD within 4 years and by the Note 2, inspection of the upper attachment by § (2) is always mandatory.

In addition a check of ELSD must be performed every 108 MO after installation/activation.

Could you please explain:

why the inspection § (2) is always mandated?

and

why the ELSD installation/activation does not constitute a terminating action of §(2)?

EASA response:

9A) Comment not agreed - See EASA Answer to comment 5

9B) Comment noted - See EASA Answer to comment 4.

