



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-011

[Published on 26 January 2018 and officially closed for comments on 23 February 2018]

Commenter 1: easyJet – Pawandeep Kalyan – 31/01/2018

Comment # 1

Regarding the subject PAD, easyJet would like to make a comment regarding the “Credit” as defined in Paragraph (6):

Credit:

(6) Inspections and corrective actions on an aeroplane, accomplished before the effective date of this AD in accordance with the instructions of Airbus SB A320-53-1259 at original issue, or Rev. 01, are acceptable to comply with the requirements of this AD for that aeroplane. After the effective date of this AD, SB A320-53-1259 Rev. 03 must be used.

if inspections and corrective actions have been performed at SB A320-53-1259 original issue or Rev. 01 are acceptable to comply with the requirements of the upcoming AD, please ensure that the “Credit” statement is modified to read as follows (proposed additions are in red):

“Inspections and corrective actions on an aeroplane, accomplished before **and after** the effective date of this AD in accordance with the instructions of Airbus SB A320-53-1259 at original issue, or Rev. 01, are acceptable to comply with the requirements of this AD for that aeroplane. After the effective date of this AD, **only SB A320-53-1259 Rev. 00, SB A320-53-1259 Rev.01 &** SB A320-53-1259 Rev. 03 must be used”.

In summary, easyJet’s opinion is as follows:

if the inspections and corrective actions accomplished at original issue or Rev. 01 of the SB are acceptable to comply with the requirements of the AD **before** the effective date of the AD, they must also be acceptable **after** the effective date of the AD.



EASA response:

Comment not agreed. SB A320-53-1259 Rev. 03 includes also improved instructions.

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

Commenter 2: Air France – Odon Ludovic MBARA – 05/02/2018
Comment # 2

AFR is pleased to provide you with following comments regarding PAD No : 18-011 :

Paragraph 9 “Additional Work”:

For aeroplanes previously inspected in accordance with the instructions of Airbus SB A320-53-1259 Rev. 02, within 2 000 FC or 4 000 FH, whichever occurs first after the effective date of this AD, without exceeding 5 000 FC or 10 000 FH, whichever occurs first since the last DET per Airbus SB A320-53-1259 Rev. 02, accomplish the additional work as identified in, and in accordance with the instructions of, Airbus SB A320-53-1259 Rev. 03.

Since inspection started, 38 A/C have been inspected and 12 A/C in AFR Fleet have been found with Ti-Angles cracked, Both have been replaced further SB initial issue to SB Rev 02. No cracks found after rototest on Keel Beam. So AFR is concerned by the Additional task required by the Revision 03.

Additional work is required by this revision (03) for aircraft inspected by Revision No. 02 of this Service Bulletin.

The Additional Work describes the replacement of the rivets PN EN6081D4-04 by EN6081D5-04, EN6081D4-05 by EN6081D5-05 and EN6081D4-06 by EN6081D5-06.

AIRBUS recommends the additional work to be accomplished within one year after the issue of this revision.

It is difficult to measure rivets diameter without removal from only their (accessible) head. It depends of the manner that they have been installed. AFR has contacted AIB Team to clarify the mean to check Installed Fasteners diameters (TR: 80399275) by its “Pan Head”. It can induce error or confusion between D04 & D05.

Please this Additional work has to be clarified and measurement process have to be introduced in the SB accordingly (Correspondence between the measured Pan Head and the expected rivet diameter)



EASA response:

Comment noted: The comment has been shared with Airbus. AIRBUS confirm that there is a difference of diameter between the EN6081D4 (3,2mm) and the EN6081D5 (4,0mm) that is visible and easily measured. AIRBUS did not confirm at CRD stage that SB is to be updated for that purpose.

If a revised SB will be issued, it will be acceptable for compliance with the requirements of the AD. No changes have been made to the Final AD in response to this comment. No changes have been made to the Final AD in response to this comment.

Commenter 3: United Airlines – Neil Sorensen – 13/02/2018
Comment # 3

After reviewing PAD 18-011, UAL has the following comments regarding Paragraph (9) Additional Work:

- A) Since the additional work relates to issues with previously replaced angles due to incorrect rivets, please revise “for aeroplanes previously inspected” to “for aeroplanes with a previously replaced angle”. There would be no need to inspect an aircraft if the operator’s records show there was not an angle replacement during the previous SB inspection.
- B) Please include an exception for the additional work if the operator already updated their angle replacement procedures prior to release of SB A320-53-1259 R03. Airbus published OIT 16-0032 alerting operators of the rivet part number discrepancies within SB A320-53-1259 R02. OIT 16-0032 provided the correct rivet part numbers and locations that were corrected in SB A320-53-1259 R03. As a result, there would be no need to accomplish the additional work if operator’s records show that the angle replacement instructions were corrected prior to the release of SB A320-53-1259 R03.
- C) Why does the additional work not address previous angle replacements accomplished per SB A320-53-1259 R00 and R01? These earlier SB revisions did not include any procedures for rivet installation details and part numbers on the fairing shear wall panel; it is completely missing. I believe there is a potential unsafe condition with SB A320-53-1259 R00 and R01 due to the lack of procedures and unknown condition at these areas. Please investigate whether or not previous angle replacements during SB A320-53-1259 R00 and R01 need to be addressed and provide those instructions accordingly.

EASA response:

3A) Comment agreed: the final AD has been modified accordingly.

3B) Comment agreed: the final AD has been modified accordingly.

3C) Comment not agreed. Even if no rivet diameter was specified in both original issue and Rev 01 of SB 53-1259, it is considered standard practice to reinstall the adequate rivet versus the hole diameter. No changes have been made to the Final AD in response to this comment.



Commenter 4: Aerlingus – David Burke – 28/03/2018**Comment # 4**

Concerning EASA PAD 18-011, EIN are aware the compliance time for comments has expired, however, given the AD has not yet been released, EIN wish to comment as follows please:

Concerning AD Paragraph 9:

EIN have Qty.5 A320 aircraft affected as Qty.5 aircraft had their Ti-angles replaced per A320-53-1259 Rev.02.

EIN shall embody the additional work (paragraph 9) during next C Check, however, EIN would request if EASA mandate the additional work that sufficient Grace Period is given to allow operators reach next Heavy Maintenance Visit. (Threshold of 2000FC/ 4000FH after AD issuance date will result in unscheduled maintenance visits for EIN aircraft (assuming AD is released shortly. Please note, as per Airbus SB A320-53-1259, maintenance access alone consumes 160 man-hours. EIN would request a Grace period of 4000FC / 6000FH.

EASA response:

Comment not agreed: Available data does not support a general extension of the compliance time. For specific MSN, anyway, temporary exemption under the provision of Article 14.4 of the Basic Regulation, or AMOC can be requested. No changes have been made to the Final AD in response to this comment.

