

COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-013R1

[Published on 28 January 2019 and officially closed for comments on 25 February 2019]

Commenter 1: Air China – Yu Emei – 31/01/2019

Comment # 1

Recently RIL SA25M17006139 R03 has informed operators about EASA AD release expected Q1-2019. Airbus SB A320-25-1BGK original issue, dated 13 October 2017 will be as Ref. Publications shown in EASA PAD No.: 18-013.

Now SB A320-25-1BGK R01 has replaced its original issue. And after SB A320-25-1BGK R01 was issued there are still some problems about it. The detailed information is as the attached TR 80514124-005 Sep 18th, 2018 and TR 80514124/008 Jan 21th, 2019. So for some problems SB 320-25-1BGK R01 is needed to revise. According to TR 80514124-008 SB 25-1BKG next revision R02 should be available in Q3 2019.

From operator side we suggest EASA AD No.: 18-013 should be issued after SB 25-1BKG next revision R02 will be available in Q3 2019. If not, we have to wait to do modification until Q3 2019 because it will be more reasonable for operators to do modification according to the correct SB.

EASA response:

Comment not agreed. The next revision of referenced SB will be acceptable for compliance with the AD. No additional work is expected to be included in those revisions. No changes have been made to the Final AD in response to this comment.

Commenter 2: Cathay Pacific – Gary Chan – 19/02/2019

Comment # 2

Airbus SB A320-25-1BGK aircraft effectivity includes Cathay Group aircraft (operator HAD) MSN 4023, 4247, 5024, 5030, 5362, 5429 for overhead stowage compartment modification.

However, the listed aircraft overhead compartment has been modified per EASA STC no. 10051176.

This PAD should not be applicable to the above aircraft.



EASA response:

Comment Noted. To determine whether and how accomplishment of the STC affects the unsafe condition identified in the AD, EASA recommend the operator to seek advice from the STC holder. If accomplishment of the STC provides an adequate level of safety against the unsafe condition identified in the AD, or if the STC prevents accomplishment of the Airbus SB, a request for AMOC can be filed.

In case of need to get familiar with the AMOC process, please refer to EASA FAQ.

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

Commenter 3: Air New Zealand – Duan Russell – 21/02/2019
Comment # 3

Air New Zealand A320 Domestic A/C are effected by Airbus MOD A320-25-1BGK, has EASA and Airbus considered the option of regular torque checks of the affected screws as part of the maintenance programme instead of replacing them all as part of MOD A320-25-1BGK or can the torque checks be an alternative means of compliance to MOD A320-25-1BGK.

EASA response:

Comment not agreed. The maintenance alternative procedure supported by this comment has been examined and found not acceptable as the location of some of the screws is difficultly reachable. In addition a repeated torqueing would lead to the degradation of friction resistance of the threats, potentially accelerating the loss of screw. No changes have been made to the Final AD in response to this comment.

Commenter 4: Lufthansa Group – Daniel Goebel – 25/02/2019
Comment # 4

According to the attached PAD the modification according to the referenced Airbus SBs A320-25-1BGK Rev. 1, A320-25-1BGL Rev. 1 and A320-25-1BKW Rev. 1 shall be finished 60 month after the effective date of the AD. Based on the high number of Man hour (Mh) for getting access and the modification itself required for each aircraft, we have planned the implementation of these SBs on our fleets during IL- or D-check that have an interval of 6 years (IL-check) and 12 years (D-check). During these checks the sidewall linings and the PSIU channel parts will be removed either. This will



eliminate additional Mh for getting access to the OHSC mounting brackets. Lufthansa Technik Shannon LTD and Lufthansa Technik in SXF stated that they never have had the problem of loose screws of the OHSC attachment during checks done on DLH A320Fam aircraft.

From SWR we received the information that they have modified several aircrafts according to SB A320-25-1BGK without finding of loose screws on the OHSC attachment plates. This also leads to my assumption that the extension to 72 month for the accomplishment of the SBs based on effective date of upcoming EAD will not create an unsafe situation of the aircrafts.

Another issue is that Airbus has problems with the supply of the required materials. (Material orders for higher number of aircraft mod kits placed in January 2018 with estimated delivery dates for July 2019.)

Therefore Lufthansa Group Airlines would prefer an implementation period of 72 month after effective date of the AD instead of 60 month to minimize special layovers for the AD/SB implementation.

EASA response:

Comment not agreed. Instructions from SB were available since October 2017, and then, considering 60 months from AD effective date, provides more than 72 months from SB publication date. No changes have been made to the Final AD in response to this comment.

