



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-048

[Published on 04 April 2018 and officially closed for comments on 02 May 2018]

Commenter 1: United Airlines – Neil Sorensen – 23/04/2018

Comment # 1

Between SB A320-92-1087 R03 and SB A320-92-1119 R00, the required for compliance (RC) paragraph 3.D – Testing after Repair has conflicting verbiage for what is required on testing. SB A320-92-1087 R03 subtask 921087-700-002-001 step (b) states to accomplish the applicable component tests “depending on the removed items for access”. Whereas SB A320-92-1119 does not have a “depending on the removed items for access” statement. Having this statement is important to account for different configurations within the 10VU rack. For example, some UAL aircraft are not equipped with Angle of Attack (AOA) indicators or Integrated Standby Instrument System (ISIS). Therefore, these required tests cannot be accomplished.

As a result, the required Testing following a repair may not be possible to accomplish. To relieve this required for compliance paragraph, we request the final AD state that the service bulletin Test instructions are only required for compliance if the applicable component was removed and reinstalled for access. Alternatively, state that paragraph 3.D of the service bulletins are not required for AD compliance so that operators may deviate as required depending on the configuration of their aircraft and/or components removed for access.

EASA response:

Comment partially agreed: SB 92-1119 indicates that some equipment may not be installed. The final AD has been amended and a note has been added to clarify that some SB instructions must not be accomplished (for equipment which are not in the aeroplane configuration).

Commenter 2: Air France – Benjamin Pouyet – 12/04/2018

Comment # 2

The PAD says:



“Reporting:

(6) Within 90 days after each DET as required by paragraph (1) or (2) of this AD, as applicable, report the results (including no findings) to Airbus.”

Question:

Why does reporting constitute an airworthiness criteria which justify a specific paragraph in the future AD ?

Reporting is already asked to operator through dedicated SB.

EASA response:

Comment noted: unless required by the AD, even if included in the instruction of the SB, reporting would not be mandatory (see also the EASA AD writing instructions, available at this [link](#)). No changes have been made to the Final AD in response to this comment

Commenter 3: Cathay Pacific Airways – Eli Woo – 06/04/2018
Comment # 3

Can EASA please clarify the definition of “**since aeroplane first flight**” in paragraph (2) for Group 2 airplanes?

Refer to Airbus MANDATORY SB A320-92-1119, section E (2) Table 1, the DET of the 10VU lugs is required to be done at a threshold of “30000 FC or 60000 FH **from Entry into Service**”.

Is there any differences in the terminology / definition between PAD’s “**since aeroplane first flight**” versus Airbus Mandatory SB’s “**from Entry into Service**”?

EASA response:

“Aeroplane first flight” is the first flight of the aeroplane, including pre-delivery test flights, which is recorded in the aeroplane logbook and is univocally identified. “Entry into service” is related to first commercial flight of the aeroplane, which data could not be available to all operators, e.g. in case of aeroplane having been previously operated by another airline. It is the use to indicate the first flight for compliance time in FH and/or FC. No changes have been made to the Final AD in response to this comment.



Commenter 4: Lufthansa Technik – Dennis Geipel – 04/04/2018**Comment # 4**

4A) PAD Par. (1) states : “For Group 1 aeroplanes [...] in accordance with the instructions of the applicable SB”.

As this Paragraph only refers to Group 1 aeroplanes, the paragraph could more easily read “For Group 1 aeroplanes [...] in accordance with the instructions of SB A320-92-1087” avoiding any potential misunderstandings.

4B) PAD Par. (2) states : “For Group 2 aeroplanes [...] in accordance with the instructions of the applicable SB”.

As this Paragraph only refers to Group 2 aeroplanes, the paragraph could more easily read “For Group 2 aeroplanes [...] in accordance with the instructions of SB A320-92-1119” avoiding any potential misunderstandings.

4C) PAD Par. (4) refers to multiple lug cracking and states “[...] before next flight, accomplish the applicable corrective action(s) in accordance with the instructions of the applicable SB”

We are questioning if all measures including reporting must be performed before next flight. To our mind, the “before next flight” rule only applies to the repair action. Therefore, this paragraph could more easily read “[...] before next flight, repair the damaged lugs in accordance with the instructions of the applicable SB”.

Reporting action within 90 days is mandated through PAD Par. (6), repetition of the inspections is mandated through PAD Par. (1) or (2).

4D) Same applies to PAD Par. (3). We understand only the repair action can be postponed in accordance with Table 2, reporting must be done as per PAD Par. (6).

4E) PAD Par. (5) provides information about non-termination of the repetitive inspections through PAD Par. (3) or (4). However, we would appreciate an exit statement for potential terminating actions through Airbus instructions, e.g. “Accomplishment of corrective action(s) [...] does not constitute terminating action for the repetitive inspections as required by paragraphs (1) or (2) of this AD, as applicable, for that aeroplane, unless specified otherwise in the instructions provided by Airbus.”

EASA response:

4A) Comment agreed: the final AD has been modified accordingly

4B) Comment agreed: the final AD has been modified accordingly

4C) Comment agreed: the final AD has been modified accordingly

4D) Comment agreed: the final AD has been modified accordingly



4E) Comment not agreed: the AD does not require contacting Airbus for repair instructions (which could be, on a case by case basis, terminating action). The AD requires repair in accordance with the instruction of the applicable SB, which is not terminating action for the repetitive inspections. Should a terminating action be included in a later revision of the SBs, the AD will be revised accordingly. No changes have been made to the Final AD in response to this comment.

