



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-071

[Published on 07 June 2018 and officially closed for comments on 05 July 2018]

Commenter 1: Lufthansa Technik – Dennis Geipel – 08/06/2018

Comment # 1

A) The reason section states “[...]Consequently, both ALI tasks 531103-01-2 and 531103-01-3 will be deleted at the next opportunity of the applicable Airbus airworthiness limitations section document for the aircraft models affected by this AD [...]”. Could you please confirm that the relevant ALI tasks will be kept active for A320neo A/C?

B) PAD Par (1) and (2) both refer to mandatory inspections as per the applicable inspection SB. Par (1) refers to pre 53-1330 A/C (Table 1 lines A-C) and post 53-1330 A/C (Table 1 lines B, D). We would like to recommend a clear distinction between inspection on not modified A/C through Par (1) and inspection on modified A/C through Par (2) (as it was done in the past through clear distinction between ALI 531103-01-2 and 531103-01-3, or as known from EASA AD 2016-0238), amending PAD Par (1), (2) and (4):

- (1) Within the compliance time as defined in Table 1 of this AD, and, thereafter, at intervals not to exceed 16 800 FC, accomplish a rototest inspection of each affected area in accordance with the instructions of the applicable inspection SB.

Table 1: Inspection Thresholds

Compliance Time (whichever occurs later, A, B, C)	
A	Before exceeding 30 000 FC since aeroplane first flight
B	Before exceeding 16 800 FC since last accomplishment of ALI task 531103-01-1, or 531103-01-2
C	Within 2 500 FC after 31 May 2017 [reference date for the compliance time included in ALS Part 2 rev. 6], without exceeding 48 000 FC from aeroplane first flight.



- (2) After modification of an aeroplane in accordance with the instructions of the applicable modification SB, except as specified in paragraph (4) of this AD: Before exceeding 53 900 FC since embodiment of the applicable modification SB and, thereafter, at intervals not to exceed 16 800 FC, accomplish a rototest inspection of each affected area in accordance with the instructions of the applicable inspection SB.
- (4) Modification of an aeroplane in accordance with the instructions of the applicable modification SB, provided this is accomplished at 6 100 FC since aeroplane first flight or later, constitutes terminating action for the repetitive inspections as required by paragraph (1) and (2) of this AD for that aeroplane. After modification before 6 100 FC since aeroplane first flight, inspections as per paragraph (2) of this AD apply.

This would to our mind allow a clearer and easier way of correct inspection due date setting and thus error avoidance.

C) Credit for ALI cancellation is given in PAD Par (5). However, we would appreciate a clear statement concerning repair approval impact on application of the inspection tasks of this AD (as also done in EASA AD 2016-0238), e.g.:

(6) For an aeroplane that has been inspected per ALI task 531103, or Par (1) or (2) of this AD, as applicable, and repaired in accordance with Airbus Repair Design Approval Sheet (RDAS), accomplish the next due inspection for each repaired affected area in accordance with, and within the time period after repair, as specified in Airbus RDAS, as applicable. For all affected area where no damage or cracks was detected (i.e. those not repaired), see paragraph (1) or (2) of this AD, as applicable.

D) As of now, we understand that as soon as one (1ea) fastener hole is found cracked, PAD Par (3) applies and PAD Par (4) application is no longer allowed for that aeroplane (ban of frame wise or door stop wise modification). In case a frame wise/ door stop wise modification is allowed, please insert an additional paragraph into this AD for reasons of clarity.

EASA response:

1A) We confirm that ISB will replace the ALI tasks for CEO A/C only. Dedicated ALS will remain applicable to NEO A/C.

1B) Comment not agreed: the proposed wording for paragraph (2) would require additional inspections to those required by paragraph (1) of the AD: an aeroplane on which SB A320-53-1330 is embodied at 1000 FC, would require inspections at 30000 FC, then 46800 FC (as per paragraph (1)), and then at 54900 FC (as required by paragraph (2)).

1C) Comment agreed, AD updated accordingly

1D) Comment agreed, AD updated accordingly.

No changes have been made to the Final AD in response to comments 1A and 1B



Commenter 2: Cathay Pacific Airways – Jimmy Cheng – 26/06/2018

Comment # 2

- A) In accordance with Paragraph 2, embodiment of SB A320-53-1330 will require another inspection at 53900FC since embodiment date, where paragraph 4 states that if SB A320-53-1330 was accomplished prior to 6100FC since first flight can terminate the inspection requirements altogether. Please confirm if the following interpretation from CPA is correct:
- Aircrafts embodied SB-A320-53-1330 before 6100FC since first flight do not require inspection per SB-A320-53-1339 at all.
- Aircrafts that embodied SB-A320-53-1330 after 6100FC since first flight will continue to be affected by the inspection requirements, but will be deferred to a Compliance Threshold of 53900FC from embodiment date, and an inspection interval of 16800FC thereafter.
- B) For Paragraph 5, please can EASA elaborate and clarify “...on the basis of which the operator or the owner ensures the continuing airworthiness of each operated aeroplane.” Generally, it is believed that operator must ensure continued airworthiness of each aircraft, and in no particular for only complying to Paragraph 5 requirements. Are there any particular reasons behind such statement? If not, this statement seems to cause confusion and preferably be removed.

EASA response:

2A) Comment not agreed. Accomplishment of Airbus SB A320-53-1330 constitutes terminating action for the repetitive inspections required by paragraph (1) only when accomplished at or after accumulating 6 100 FC since first flight. Next inspection would be actually due beyond 60 000 FC.

2B) Comment not agreed. For aeroplanes registered in Europe, complying with the approved AMP is required by Commission Regulation (EU) [1321/2014](#), Part M.A.301, paragraph 3 (see also applicable ALS ADs). Paragraph (5) allows removing from the AMP some tasks.

No changes have been made to the Final AD in response to these comments

Commenter 3: United Airlines – Neil Sorensen – 04/07/2018

Comment # 3

- A) In the Reason section, it is stated that ALI 531103-01-2 and 531103-01-3 will be deleted by Airbus at the next ALS revision opportunity. Due to the unknown dates of the ALI deletion and the final AD publication, we request that the ALI 531103-01-2 task may continue to be used for this upcoming



AD compliance up to 120 days from the AD effective date or until the ALI is deleted, whichever occurs later. This will allow operator's maintenance program and engineering departments adequate time to transition internal task cards and/or engineering orders from the ALI task to the SB instructions. Transitioning internal documents immediately after AD publication is not feasible.

We see no reason the ALI task cannot take AD credit because the ALI 531103-01-2 task and SB A320-53-1339 perform the same open hole rotating probe HFEC inspection. In addition, the ALI and SB have the same inspection threshold and intervals.

B) PAD 18-071 Paragraph (3) states to accomplish repair instructions in accordance with SB A320-53-1339. Be advised that Rev 00 of this SB does not contain repair instructions. Rather, the SB states "contact Airbus" for repair instructions. There is a Repair Drawing R53113118 available for the door stop fitting hole repairs, which Airbus has provided us during the related ALI task.

Airbus published TFU 53.11.00.023 to inform operators this Repair Drawing will be provided in the instructions of the next SB A320-53-1339 revision opportunity. Since SB A320-53-1339 R01 is not yet available, please state that Repair Drawing R53113118 may be used for repair instructions in the final AD.

EASA response:

3A) Comment not agreed. It is assumed that the 14 days between AD publication and its effective date are adequate. Furthermore, temporary exemptions can be (under EU rules) agreed with the Authority of the State of Registry [Regulation (EU) 2018/1139, Article 71 exemption]

3B) Comment not agreed. The AD actually requires to "accomplish corrective actions" iaw SB A320-53-1339, which includes "contact Airbus and follow instructions" or, if repair instructions will be included in later revision of that SB, "repair iaw SB instructions".

No changes have been made to the Final AD in response to these comments

