



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-082

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**Commenter 1: Delta Air Lines – Matthew Tash – 16/07/2018**

### Comment # 1

A) EASA PAD No. 18-082 Reason Section vs. Credit Section Confusion:

Reason, Paragraph 5 and 6 states:

“Since AD 91-182-020(B) R2 was issued, subsequent investigations identified, in those areas (zones 574 and 674), issues with the protective sleeves previously installed in production, through mod 22109, or in service through SB A320-24-1045.”

And

“Prompted by these findings, Airbus issued SB A320-92-1115, providing instructions for installation of a new protective sleeve on those cables localized in zones 574 and 674, and introduced in production (through mod 22626) new design electrical cables more resistant to chafing.”

Comment: Based on the Reason statements above, it is confusing that the AD will then give Credit in the Credit section of PAD 18-082 for corrective actions accomplished on aircrafts prior to AD effective date, with the instruction of Airbus SB A320-24-1044 (temporary repair) at Revision 2 or 3, or Airbus SB A320-24-1045 at Revision 1, 2 or 3, to comply with the requirements of paragraph (7) and (8) of the AD. As per the reason section above, based on investigation, the application of those Service Bulletins resulted in issues with the protective sleeves that were installed by mod 22109 and SB A320-24-1045. This is confusing for DAL as it appears that we are getting credit for installing items that will continue to cause problems.

B) EASA PAD No. 18-082 Credit Section:

PAD 18-082 will supersede AD 91-182-020(B) R2, but in the Credit Section of the PAD for corrective actions accomplished on aircrafts prior to AD effective date with the instruction of Airbus SB A320-24-1044 (temporary repair) at Revision 2 or 3, or Airbus SB A320-24-1045 at Revision 1, 2 or 3, to comply with the requirements of paragraph (7) and (8) of the AD.

Comment: In this section it does not make mention of modification 22109. Mod 22109 should be listed with clarification if needed. The mod is clearly listed in the Reason Section, Paragraph 5.

C) EASA PAD No. 18-082 Modification/Ref. Publications Section:

SB A320-92-1115 Rev 00 dated 11 April 2017 does not clearly define a pre-mod condition.



Comment: Service Bulletin A320-92-1115 Rev 00 does not provide instructions on work previously installed by AD 91-182-020(B) R2 with SB 24-1045 Rev 1, 2, or 3, or by mod 22109. Dispositioning post AD findings that include wire repair, chafing inspections, and damage findings will be needed to maintain AD compliance.

**EASA response:**

**1A) Comment noted. Credit is only given for corrective actions accomplished before the effective date of the AD; after the effective date of the AD, corrective actions must be accomplished as required by paragraphs (7) and (8) of the AD. Terminating action is anyway required by paragraph (9) and (10) of the AD.**

**1B) Comment agreed. Final AD has been updated accordingly**

**1C) Comment agreed. Airbus SB A320-92-1115 Rev. 01 has been published, and the Final AD has been updated accordingly**

