



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-162

[Published on 29 November 2018 and officially closed for comments on 27 December 2018]

**Commenter 1: Delta Air Lines – Tara Jain – 07/12/2018**

### Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 18-162, dated 29 November 2018

(B) Airbus Service Bulletin (SB) A320-57-1198

Based on the Ref (A) Applicability paragraph, all manufacturing serial numbers of Airplanes A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 are affected.

Upon further reading Ref (A) Suspected part Definitions paragraph, it was observed that the paragraph refers to Appendix 1 for applicable part numbers/ serial number combinations delivered on specific Aircraft MSNs are applicable

Comparing the Ref(A) applicability paragraph to Ref(A) Suspected part Definitions paragraph, it seems that Ref (A) Applicability paragraph indicates a wider range of A/C being effective which identify the affected units at the airframe level and citing all manufacturing serial numbers. Whereas Appendix 1, which is referred to in Ref(A) Suspected part Definitions paragraph for a list of AD affected parts, identifies QTY 352 part number/serial number combinations as AD affected that were delivered on QTY 176 specific Aircraft MSNs.

Therefore, DAL requests additional clarification in the Applicability paragraph to indicate all applicable flap P/N / serial number combinations identified in Appendix 1 delivered on applicable manufacturing serial numbers of A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes as being effective.

Lastly, DAL would like to thank EASA for the incorporation of Appendix 1 into Ref (A), calling out the specific part numbers/ serial number combinations greatly assists operators in identification for AD effectivity when such documentation is contained in the AD itself.

### EASA response:

**Comment not agreed: the AD must be applicable to all MSN since it cannot be excluded that an affected part, initially installed on the correspondent MSN listed in Appendix 1, has been removed and reinstalled on a different MSN, not listed in Appendix 1. Operators must determine whether an affected part is installed or not and, if required, accomplish the inspection as required by paragraph (1) of the AD. Paragraph (4) of the AD allows**



*using airplane delivery and maintenance records to determine whether an affected part is installed. Furthermore, Note 1 in Appendix 1 reminds that airplane MSNs listed in Appendix 1 are provided for reference only.*

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

**Commenter 2: Lufthansa Technik AG – Oliver Untucht – 19/12/2018**

**Comment # 2**

PAD 18-162 notices upcoming rulemaking of Airbus SB A320-57-1198.

It requires an inspection of certain outer Flaps of A320 models.

The affected part- and serial numbers are listed in Appendix 1 of PAD.

Lufthansa wants to point out, that the P/N given in Appendix 1 are not the P/N of the outer Flap rather the P/N of the suspect doubler.

Desired change:

Correct table in Appendix 1 showing the correct P/N's of the outer Flap instead of the suspect doubler.

**EASA response:**

*Comment agreed: P/N listed in the PAD are those of suspected doublers. Final AD has been amended accordingly.*

