

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-163

[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) Airworthiness Limitation Item (ALI) Task 531105
- (B) Airbus Service Bulletin (SB) A320-53-1410
- (C) Airbus Service Bulletin (SB) A320-53-1411
- (D) EASA Proposed Airworthiness Directive: PAD No. 18-163, dated 29 November 2018
- (E) Airbus Service Bulletin (SB) A320-53-1337
- (F) Airbus Service Bulletin (SB) A320-53-1338

Upon reviewing Ref (D) para (7), it was observed that it requires reporting within 90 days after each inspection of both negative and positive findings. In addition, during review of Ref (A), it was noted initial inspections are required at 21,100 total flight cycles and the repetitive inspections are required at intervals not to exceed 3,100 flight cycles thereafter (which equates to about every two years) requiring all crack findings to be reported.

For operators that have accumulated over 30,000 total flight cycles, these A/C are currently accomplishing the ALI task on the repetitive interval. These applicable operators have been reporting positive findings every two years (since accumulation of 21,100 total flight cycles). The negative findings can be reasonably deducted based on all positive findings, and the operator's utilization.

Based on the substantial cyclical data collected, and multiple reports of positive indications, the OEM has been able to develop and published standardize repairs for findings which have been since incorporated in Ref (B) and Ref (C). Furthermore, modification service bulletins, Ref (E) and Ref (F), have been developed based on reported data.

Therefore, since a sufficient amount of data has been collected in order to develop these standard repairs, DAL requests Ref (D) para (7) only require reporting of positive findings in lieu of reporting both positive and negative findings.

#### **EASA response:**

**Comment agreed. Final AD has been amended accordingly.**



**Commenter 2: Türk Hava Yolları Teknik A.Ş – Hasan Kahraman – 24/12/2018**

**Comment # 2A**

Please find hereafter or comments regarding paragraphs 7 and 8:

*(7) Within 90 days after each SDI as required by paragraph (1) of this AD, report the results (including no findings) to Airbus. Using the instructions of the inspection SB is an acceptable method to comply with this reporting requirement.*

Please evaluate the removal of this paragraph from the PAD. It is clear that the airworthiness is not affected for this paragraph does not require any action on the airplane side. Moreover, showing compliance for reporting requirements for each inspection on each airplane leads to a big attempt to follow up and timely report the results. Airbus may require inspection results through normal SB accomplishment process.

**Comment # 2B**

*(8) Accomplishment of inspections and corrective actions on an aeroplane, as required by this AD, allows cancellation of ALI tasks 531105 from the approved Aircraft Maintenance Program, on the basis of which the operator or the owner ensures the continuing airworthiness of that aeroplane.*

After the effective date of this AD, operators may remove ALI tasks 531105 inspections from the maintenance program without waiting the first inspections per the ISB A320-53-1410 and SB A320-53-1411. Therefore please consider revising the paragraph(8) as follows:

After the effective date of this AD, compliance of ALI tasks 531105 is not required, since the contents are transferred to this AD.

**EASA response:**

**2A) See EASA answer to Comment #1**

**2B) Comment not agreed. This text is EASA AD standard wording, which identifies the minimum standard allowing cancellation of certain ALI tasks. To be noted that NAA are in charge of approving AMP. No changes have been made to the Final AD in response to this comment.**

