



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-171

[Published on 11 December 2018 and officially closed for comments on 08 January 2019]

Commenter 1: Air France – Xavier Francois – 13/12/2018

Comment # 1

SB 57-3144 / 4148 give instructions to identify affected parts and thus classify the aircraft in Group 1 or Group 2.

As per previous SB 57-3123/4130 and AD 2017-0060, Air France has already identified ALL the PN and SN of the slat tracks installed on their fleet, since we monitor in our IT system each slat track for each aircraft and consequently know exactly what is installed

Thus, we would like to take benefit of identification previously done and classified directly in Group 1 or Group 2 without applying method described in SB 57 3144/4148.

EASA response:

Comment acknowledged. The identification of affected parts is not explicitly required, based on the assumption that each operator knows, or can easily find out, possibly without an actual inspection. So any identification methodology would be acceptable, provided it serves the purpose of identifying the affected parts for the inspection required by paragraph (1) of the final AD.

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

Commenter 2: Türk Hava Yolları Teknik A.Ş – Hasan Kahraman – 26/12/2018

Comment # 2

We understand that EASA intends issuing an AD to eliminate the unsafe condition arising from the probability of an inappropriate part installation. Please find hereafter our considerations on the PAD content.

A. PAD classifies the airplanes as group-1 and group-2 according to installed part number. However without checking the part number of the installed tracks, it is not possible to determine which group is applicable for the airplane being inspected.



B. Since the current IPC's provide correct part numbers, we believe that part installation prohibition per paragraph (3) is not necessary. Please consider revising paragraph(1) and (2) as follows, and remove paragraph (3) and group definition.

Inspections:

(1) Within 24 months after the effective date of this AD, check the part number of LH and RH wings slat track #10 in accordance with the applicable SB.

Corrective Actions:

(2) If an affected part is found, within the compliance time specified in Table 1 of this AD, perform all applicable inspections and corrective actions in accordance with the applicable SB.

EASA response:

A. Comment not agreed. EASA consider that there is no need to require an inspection for identification. Any methodology (physical inspection, records check, etc.) is acceptable. See also answer to Comment #1.

B. Comment not agreed. Airbus IPC is not a direct EASA approved document and is not intended, nor suitable, for enforcement (e.g. AD action) purposes. EASA therefore cannot assume that operators closely follow IPC data/instructions regarding part installation (or not) on an aeroplane.

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

