

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-007

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Commenter 1: Etihad Airways – Borja Dosal Roiz – 16/01/2019

Comment # A

Paragraph (3) states: “Airbus AOT A92N002-17 at original issue, or Revision 01, or Revision 02, as applicable, are acceptable”. While the Ref. Publications section states the availability of AOT A92N002-17 original issue or Revision 01, or Revision 02, or Revision 03.

To avoid misunderstandings would be more suitable to amend the mentioned sentence like “Airbus AOT A92N002-17 at original issue, or subsequent revisions, as applicable, are acceptable”.

Comment # B

Airbus SB A320-29-1176 requires 16 Man Hours or 9 Hours elapsed time to be accomplished. Due to the long ground time required, Etihad would like to require the extension of the deadline stated in paragraph (4) from 24 months to 36 months.

Comment # C

Airbus SB A320-29-1176 is classified under ATA 29 and title is “HYDRAULIC POWER - MAIN HYDRAULIC POWER - MODIFY THE ADAPTATION DAMPER BULKHEAD FITTING FOR LH AND RH WINGS”.

Furthermore, affected publications AMM and IPC sections are ATA 29 and 57, even Structural Repair Manual (SRM) is affected. Nonetheless, EASA classifies the AD as ATA 92.

Etihad would like EASA to reconsider the classification of the AD under ATA 29.

EASA response:

1A) Comment not agreed: paragraph (3) provides credit for actions accomplished before the effective date of the AD. Actions accomplished in accordance with the AOT revision 3 are addressed by paragraph (1) of the AD, including those accomplished before the effective date of the AD (as addressed by the general statement “Required as indicated, unless accomplished previously”). Later revision of the AOT are acceptable in accordance with the statement included in the Ref. Publication section of the AD.

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



1B) Comment not agreed: available data does not support extension of compliance time.

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

1C) Comment noted. As the problematic is a potential chafing issue between electrical harness and hydraulic pipes both ATA 92 and 29 are relevant. The reason to classify the SB into the ATA 29 is mainly due to the accomplishment instructions being achieved on the hydraulic pipes, whereas the AOT ,referring to ATA 92, addresses the whole set of work to tackle the potential airworthiness issue.

Therefore EASA consider the current title acceptable as is. No changes have been made to the Final AD in response to this comment.

