

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-083

[Published on 13 May 2019 and officially closed for comments on 10 June 2019]

Commenter 1: Emirates – Peter Admiraal – 14/05/2019

Comment # 1

REF. /A/ PAD No 19-083

REF. /B/ ALI TASK 531133

REF. /C/ EASA 2019-0067

Ref. /A/ PAD has been issued, dd. May 13, 2019.

As per this PAD A319-115 all manufacturer serial numbers, except those on which Airbus modification (mod) 161230 was embodied, will be effective for the proposed AD.

UAE has one A319-115 A/C in its fleet. This A/C (MSN 4822) is a A319-VIP A/C (A319 CJ).

Ref. /A/ PAD refers to ref. /B/ ALI task, as a starting point for the proposed AD inspection threshold.

Ref. /B/ is not applicable for A319-VIP A/C, as per the AMP.

Since the referenced ALI task is not applicable, UAE believes that A319-VIP A/C (A319 CJ) should be excluded from the proposed AD.

Please advise.

Please be advised that a similar issue is pending for ref. /C/ AD.

This AD has been issued and is under revision to exclude A319 CJ from the effectivity (please refer to the attached e-mail).

EASA response:

Comment agreed. Final AD has been updated accordingly.



Commenter 2: Hifly – Marta Rodrigues – 21/05/2019

Comment # 2

Could you please confirm that something similar to the following statement should also be considered in the AD Credit section?

“Accomplishment of inspections and corrective actions on an aeroplane, as required by this AD, allows cancellation of ALI tasks 531133 from the approved Aircraft Maintenance Program, on the basis of which the operator or the owner ensures the continuing airworthiness of that aeroplane.”

EASA response:

Comment not agreed. The new inspections accomplished iaw the inspection SB do not address the full area which is inspected per ALI task 531133. The remaining area is expected to be addressed by a new ALI task, which will supersede ALI task 531133.

Paragraph (6) has been added to the final AD, accepting accomplishment of ALI task 531133-02-1 as alternative mean to comply.

See also EASA answer to comment 3 from commenter 4.

Commenter 3: Delta Air Lines – Tara Jain – 28/05/2019

Comment # 3

Reference:

- (A) Airworthiness Limitation Item (ALI) Task 531133
- (B) Airbus Service Bulletin (SB) A320-53-1402
- (C) Airbus Service Bulletin (SB) A320-53-1403
- (D) EASA Proposed Airworthiness Directive: PAD No. 19-083, dated 13 May 2019
- (E) Airbus Service Bulletin (SB) A320-53-1404
- (F) Airbus Service Bulletin (SB) A320-53-1405
- (G) Airbus Service Bulletin (SB) A320-53-1406



(H) Airbus Service Bulletin (SB) A320-53-1407

SUMMARY:

During inspection of Ref (A) of the RH side sliding window frame it was the area was found to be cracked. To address this unsafe condition, Airbus published Ref (B) and Ref (C) to perform a special detailed inspection with condensed compliance times.

Ref (D) has been issued which will require accomplishment of Ref (B) and Ref (C) to address this potential unsafe condition. If this condition is not corrected it could reduce the structural integrity of the fuselage.

DELTA'S COMMENTS

Upon reviewing Ref (D) para (4), 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 23,100 total flight cycles and the repetitive inspections are required at intervals not to exceed 3,300 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 23,100 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), Ref (F), Ref (G) and, Ref (H) 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 (4) only require reporting of positive findings in lieu of reporting both positive and negative findings.

EASA response: AIRBUS confirms the need to get inspection feedback including the negative findings to ensure real total number of inspected aeroplanes and not to extrapolate this number based of aeroplane utilisation.

Commenter 4: United Airlines – Neil Sorensen – 03/06/2019

Comment # 4

After reviewing PAD 19-083, United Airlines has the following comments:



1. “Definitions” section: Repair 1 defines rework per drawing R53113031 Issue C. Please omit “Issue C” since rework could have been accomplished with any drawing Issue (revision). The inspection SB 53-1402 and 53-1403 do not define prior R53113031 rework in accordance with any particular drawing revision.
2. Appendix 1 & 2:
 - a. “Before 31 May 2019” has already passed. This date originated from ISB 53-1402 & 53-1403 but due to later issuance of the proposed AD, this date should be updated. Please consider “before 90 days from the effective date of the AD” to align with the same grace period as comment 2.b.
 - b. Please change “within 3 months” to number of calendar days, for example, 90 days. The number of days in 3 months may get misinterpreted.
3. The required inspection area between ALI 531133-02-1 and SB 53-1402 and SB 53-1403 must be resolved before final AD issuance. Currently ALI 531133-02-1 (AMM Task 53-11-00-210-029-A) refers to NTM 53-11-33 for the HFEC inspection. SB 53-1402 and SB 53-1403 also requires to perform the same NTM. This NTM 53-11-33 (Rev 123) requires inspection of the cockpit window frame vertical flange and three angled flanges. However, SB 53-1402 and 53-1403 figures do not require inspection of the three angled flanges, only the single vertical flange. In order to resolve the discrepancy between the SB’s and NTM manual, the SB’s should be revised to refer to a generic HFEC procedure instead, and omit reference to NTM 53-11-33. Or the final AD should clarify and state the new inspections per SB 53-1402 and SB 53-1403 no longer requires inspection of the three angled flanges shown in NTM 53-11-33. See attached illustrations for discrepancy.
4. Please include a 90 day grace period after the AD effective date, allowing credit for accomplishing ALI 531133-02-1. Because ALI 531133 is currently mandated in operators’ maintenance program, it is not possible to deactivate the ALI task and activate the SB inspection program in a single day the AD becomes effective. It is especially difficult for aircraft currently in a base maintenance visit where the ALI task is previously planned or currently in work. A 90 day grace period will allow operators to effectively remove the ALI task cards from their maintenance program while simultaneously incorporating a new engineering order to embody the SB inspections. We see no reason the ALI 531133-02-1 task cannot continue to be accomplished for 90 days beyond the AD effective date. As mentioned above in Comment #3, the ALI 531133-02-1 and SB 53-1402 / SB 53-1403 both refer to the same inspection task. And the threshold (23100 FC) and intervals (3300 FC) are the same between ALI 531133-02-1 and the proposed AD. The only significant difference is that the proposed AD allows operators to optionally extend the next inspection by performing ‘Repair 1’ or ‘Repair 2’.

EASA response:

- 1) Comment not agreed: the issue C was called up because the definition of the rework was not the same in the former revision.**
- 2a) Comment partially agreed. “31 May 2019” was inherited from the Compliance time allowed in ALS Part 2 revision 6. Final Ad has been updated, removing the reference**
- 2b) Comment agreed. Final AD has been updated accordingly.**
- 3) See EASA answer to Commenter 2. Airbus can be contacted for advance approved instructions pending documentation revision.**



4) Comment not agreed. The AD is effective 14 days after publication, allowing a reasonable time to update A/C maintenance documents. Nevertheless, due to the particularity of the specific subject (see EASA answer to Commenter 2) paragraph (6) has been added to the final AD.

