

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-100

[Published on 04 June 2019 and officially closed for comments on 02 July 2019]

### Commenter 1: Singapore Air – Soh Kian Ann – 06/06/2019

#### Comment # 1

PAD 19-100 is not clear regarding which flap is affected as the PN of the flap is not listed in Appendix 1. As per PAD 19-100 Appendix 1, outer flap SN TB15477 is listed under MSN 5563 however, similar SN TB15477 is found to be installed on TTW MSN 6187 since delivery. TTW is also found not listed in SB A320-57-1190 effectivity. Please kindly advise whether TTW is affected by this PAD.

#### EASA response:

**Comment noted: any aircraft equipped with a suspected part is affected by the inspection requirement of paragraph (1) of this AD, irrespective of aircraft MSN being listed in the SB A320-57-1190 effectivity. Please refer to Note 1 of Appendix 1 of the AD. No changes have been made to the revised PAD in response to this comment.**

### Commenter 2: American Airlines – James E Honeycutt – 17/06/2019

#### Comment # 2

Paragraph (1) states that the effective date for compliance of the AD will be 84 months from the reference date as defined in Appendix 1 or 4 months from the issue date of the AD whichever occurs later.

The reference dates in the appendix appear to be the manufacture date of the aircraft, which results in the majority of the aircraft requiring the 4 month compliance time.

The inspection is to be accomplished IAW with SB A320-57-1190. IAW RIL SA57M15001426 a grace period for replacement of at least 1 year or 1000FC will be granted upon a finding.

Based on time limit and the extended grace period for a known finding it can be concluded that this condition is not critical to the integrity of the flap and therefore the 4 month compliance time is excessively restrictive.

SB A320-57-1198 addresses a similar issue, however provides a 12 year from manufacture compliance date. Due to the similarity of these SBs, it would be preferable to combine the documentation for accomplishment and follow the compliance time of SB A320-57-1198.

AAL requests that the compliance time for PAD 19-100 be extended to match the 12 year from manufacture date to match that of A320-57-1198.

***EASA response:***

***Comment agreed: PAD has been amended accordingly.***

***Commenter 3: Cathay Pacific Airways – Hyphen Choi –25/06/2019***

***Comment # 3***

A. HDA assumes the affected O/B Flaps in PAD 19-100 Appendix 1 is same as SB A320-57-1190 Rev 01 Appendix 07, EASA please confirm.

B. All affected O/B Flaps within HDA A320/A321 fleet have been inspected per SB A320-57-1190 Rev 00 or Rev 01, complying the PAD requirements. However we have 4EA O/B Flaps with the placard missing, not sure if the flaps are affected. HDA has performed the SB A320-57-1190 inspection to the flaps anyhow, the inspection had nil findings, refer the attached reports. EASA please confirm the 4 flaps have complied the AD requirements, and no further action is required.

***EASA response:***

***3A) EASA confirms that all suspected parts listed in Appendix 1 of the AD are also listed in Airbus SB A320-57-1190 Rev 01, Appendix 07.***

***3B) EASA agrees that for an aeroplane having O/B flaps with an unknown s/n, passing an inspection iaw Airbus SB A320-57-1190 Rev 01, is acceptable to comply with the inspections requirement of this AD. Anyway, enforcement of AD is responsibility of National Aviation Authority of the State of Registry of the aircraft, which should be consulted.***

***The definition of suspected part has been modified to include parts which s/n cannot be determined.***

