

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-100R1

[Published on 29 May 2020 and officially closed for comments on 26 June 2020]

Commenter 1: Singapore Airlines Limited – Soh Kian Ann – 04/06/2020

Comment # 1

1A) This is the follow up comment (see CRD for PAD 19-100) from the previous PAD 19-100 regarding the SN of Outer Flap TB15477, which is found on both MSN 5563 and 6187. I would like to request that EASA to also include the P/N of the outer flap to both Appendix 1 and 2.


Reason is that, as per SB A320-57-1190 Figure A-GACAA, the effectivity by MSN, SN and P/N are provided. And in the SB appendix (See screen shot of SB Appendix below), LH Outer Flap SN TB15477 is listed under MSN 5563 and with P/N D5757160125500. However for MSN 6187, its RH Outer Flap is found with similar SN TB15477, but the P/N is D5757420201900 as per aircraft inspection report. (Please note MSN 6187 has not change Outer Flap since delivery).

So, providing only MSN and SN in EASA Appendix 1 and 2 is insufficient, as 2 outer flaps with different P/Ns can be found with similar SN.



15477													
		Previous		Next									
MSN	LH OUTER FLAP SN	RH OUTER FLAP SN	ITEM 1	ITEM 2									
			D57 57 160125400	D57 57 160125500	D57 58 60 9220400	D57 58 60 9220500	D57 59 62 13	D57 58 62 13	D57 58 62 14	D57 59 62 14	D57 58 62 36	D57 58 62 36	D57 58 62 45 (LH)
													D57 58 62 45 (RH)
5523	TB 15523	TB 15523			X	X	X	X	X	X	X	X	X
5524	TB 15524	TB 15664	X	X									
5525	TB 15639	TB 15639	X	X									
5526	TB 15532	TB 15600	X	X									
5527	TB 15527	TB 15527	X	X									
5528	TB 15528	TB 15528			X	X	X	X	X	X	X	X	X
5529	TB 15530	TB 15526	X	X									
5530	TB 15611	TB 15536	X	X									
5531	TB 15572	TB 15531	X	X									
5532	TB 15489	TB 15532	X	X									
5533	TB 15533	TB 15566	X	X									
5534	TB 15549	TB 15534			X	X	X	X	X	X	X	X	X
5535	TB 15578	TB 15533	X	X									
5536	TB 15539	TB 15611	X	X									
5537	TB 15537	TB 15572	X	X									
5538	TB 15543	TB 15543			X	X	X	X	X	X	X	X	X
5539	TB 15507	TB 15539	X	X									
5540	TB 15664	TB 15585	X	X									
5541	TB 15512	TB 15512	X	X									
5544	TB 15515	TB 15547	X	X									
5547	TB 15521	TB 15556	X	X									
5550	TB 15563	TB 15550	X	X									
5551	TB 15551	TB 15551	X	X									
5553	TB 15522	TB 15521	X	X									
5556	TB 15424	TB 15562	X	X									
5559	TB 15570	TB 15525	X	X									
5562	TB 15565	TB 15565	X	X									
5561	TB 15564	TB 15561	X	X									
5563	TB 15477	TB 15563	X	X									
5565	TB 15560	TB 15570	X	X									



 AIRBUS	Aircraft Inspection Report		Aircraft 320-232	Chapter
	Constituent assemblies		MSN : 6187	Date
Part Number	Description	Serial Number		
D5746134100400	TRACK 1 ASSY + LINKAGE	SNA AD130433		
D5746134200400	TRACK 2 ASSY + LINKAGE	SNA AD129469		
D5746132300800	TRACK 3 ASSY + LINKAGE	SNA AD132017		
D5746132400600	TRACK 4 ASSY + LINKAGE	SNA AD130210		
D5746132501000	TRACK 5 ASSY + LINKAGE	SNA AD131498		
D5746132600800	TRACK 6 ASSY + LINKAGE	SNA AD131613		
D5746132700400	TRACK 7 ASSY + LINKAGE	SNA AD131810		
D5746132800400	TRACK 8 ASSY + LINKAGE	SNA AD131641		
D5746132900400	TRACK 9 ASSY + LINKAGE	SNA AD130173		
D5746133000400	TRACK 10 ASSY + LINKAGE	SNA AD130176		
D5746133100800	TRACK 11 ASSY + LINKAGE	SNA AD130900		
D5746133200400	TRACK 12 ASSY + LINKAGE	SNA AD129550		
D5775001600738A	SPOILER N 1 RH	SAA 12176		
D5775001800738A	SPOILER N 2 RH	SAA 12176		
D5775002000538A	SPOILER N 3 RH	SAA 12150		
D5775002100538A	SPOILER N 4 RH	SAA 12176		
D5775002200538A	SPOILER N 5 RH	SAA 12176		
D5757065005300	INNER FLAP EQUIPPED RH	TB 16187		
D5755100603002	FLAP TRACK N 2 RH	DTL 11916		
D5755100703402	FLAP TRACK N 3 RH	DTL 11916		
D5755101003402	FLAP TRACK N 4 RH	DTL 11918		
D27550029006	FLAP TRACK N 2 CARRIAGE RH	DTL 11916		
D57550200006	FLAP TRACK N 2 BEAM RH	DTL 11916		
D27550029010	FLAP TRACK N 3 CARRIAGE RH	DTL 11916		
D57550201006	FLAP TRACK N 3 BEAM RH	DTL 11916		
D27550031006	FLAP TRACK N 4 CARRIAGE RH	DTL 11918		
D57550202010	FLAP TRACK N 4 BEAM RH	DTL 11918		
D5765000000938A	AILERON RH	SAB 26023		
D0007410300100	FLAP TRACK N 1 RH	FA 13303		
D0007410400100	FLAP TRACK N 1 RH BEAM	FA 1167		
D0007410500100	FLAP TRACK N 1 RH CARRIAGE	FA 1167		
D5757420201900	OUTER FLAP RH	TB 15477		
201581002	MAIN LANDING GEAR RH	MDL 6187		
D5746091000300	SLAT 1 ASSY RH	SA 7194		
D5746092000300	SLAT 2 ASSY RH	SA 7172		
D5746093000500	SLAT 3 ASSY RH	SA 7194		
D5746094000500	SLAT 4 ASSY RH	SA 7176		

1B) The next question will be on the applicability of inspection, as per SB A320-57-1198. Although affected part listed in Appendix 2 mentioned, it is for A321 only, but can the identified part listed in Appendix 2 be installed on A319 and A320? And if yes, does this mean EASA wants A319 and A320



installed with the affected part to carry out the inspection as per SB A320-57-1198? Please note that the applicability of SB A320-57-1198 is for A321 only.

Can EASA also provide the P/N of the outer FLAP affected similar to SB A320-57-1198 Figure A-GAAAA (See extract from SB A320-57-1198 below) for better identification of the affected parts?

A318/A319/A320/A321

CONFIG 001

SERVICE BULLETIN
Appendix 03 - Effectivity by MSN/SN/PN

MSN	D57582-4421000	LH OUTER FLAP SN	D57582-4421000	RH OUTER FLAP SN
4585	X	TB 14607	X	TB 14626
4643	X	TB 14643	X	TB 14643
4648	X	TB 14648	X	TB 14648
4654	X	TB 14654	X	TB 14654
4662	X	TB 14662	X	TB 14662
4669	X	TB 14669	X	TB 14669
4672	X	TB 14672	X	TB 14685
4682	X	TB 14682	X	TB 14682
4698	X	TB 14698	X	TB 14698
4703	X	TB 14703	X	TB 14703
4706	X	TB 14706	X	TB 14706
4710	X	TB 14710	X	TB 14710
4719	X	TB 14719	X	TB 14719
4728	X	TB 14728	X	TB 14728
4731	X	TB 14731	X	TB 14731
4737	X	TB 14737	X	TB 14737
4746	X	TB 14834	X	TB 14746
4753	X	TB 14753	X	TB 14753
4761	X	TB 14761	X	TB 14761
4771	X	TB 14771	X	TB 14771
4779	X	TB 14779	X	TB 14779
4783	X	TB 14788	X	TB 14788
4788	X	TB 14783	X	TB 14783
4792	X	TB 14792	X	TB 14792
4811	X	TB 14811	X	TB 14811
4819	X	TB 14863	X	TB 14819
4824	X	TB 14824	X	TB 14824
4826	X	TB 14826	X	TB 14826
4830	X	TB 14830	X	TB 14830
4834	X	TB 14746	X	TB 14834
4838	X	TB 14838	X	TB 14838
4843	X	TB 14843	X	TB 14843

MSN	D57582-4421000	LH OUTER FLAP SN	D57582-4421000	RH OUTER FLAP SN
4847	X	TB 14940	X	TB 14940
4850	X	TB 14850	X	TB 14850
4856	X	TB 14856	X	TB 14856
4863	X	TB 14861	X	TB 14863
4873	X	TB 14873	X	TB 14873
4881	X	TB 14819	X	TB 14881
4885	X	TB 14885	X	TB 14885
4893	X	TB 14893	X	TB 14893
4898	X	TB 14898	X	TB 14898
4901	X	TB 14901	X	TB 14901
4916	X	TB 14916	X	TB 14916
4923	X	TB 14923	X	TB 14923
4925	X	TB 14925	X	TB 14925
4932	X	TB 14932	X	TB 14932
4935	X	TB 14935	X	TB 14935
4940	X	TB 14940	X	TB 14940
4945	X	TB 14945	X	TB 14945
4949	X	TB 14957	X	TB 14957
4957	X	TB 14960	X	TB 14960
4960	X	TB 14962	X	TB 14962
4962	X	TB 14966	X	TB 14966
4966	X	TB 14971	X	TB 14971
4971	X	TB 15009	X	TB 15009
4976	X	TB 14976	X	TB 14976
4994	X	TB 14994	X	TB 14994
5009	X	TB 15025	X	TB 15025
5025	X	TB 15035	X	TB 15035
5028	X	TB 15028	X	TB 15028
5035	X	TB 15038	X	TB 15038
5038	X	TB 15044	X	TB 15044
5044	X	TB 14847	X	TB 14847
5049	X	TB 15049	X	TB 15049

MSN	D57582-4421000	LH OUTER FLAP SN	D57582-4421000	RH OUTER FLAP SN
5054	X	TB 15054	X	TB 15054
5059	X	TB 15059	X	TB 15059
5065	X	TB 15065	X	TB 15065
5074	X	TB 15074	X	TB 15074
5077	X	TB 15077	X	TB 15077
5083	X	TB 15083	X	TB 15083
5087	X	TB 15087	X	TB 15087
5099	X	TB 15099	X	TB 15099
5118	X	TB 15118	X	TB 15124
5124	X	TB 15124	X	TB 15118
5126	X	TB 15126	X	TB 15126
5133	X	TB 15133	X	TB 15133
5154	X	TB 15154	X	TB 15154
5160	X	TB 15192	X	TB 15192
5164	X	TB 15164	X	TB 15164
5169	X	TB 15169	X	TB 15169
5173	X	TB 15180	X	TB 15180
5177	X	TB 15160	X	TB 15235
5180	X	TB 15177	X	TB 15177
5186	X	TB 15186	X	TB 15186
5192	X	TB 15205	X	TB 15205
5197	X	TB 15227	X	TB 15173
5199	X	TB 15199	X	TB 15199
5205	X	TB 15210	X	TB 15210
5210	X	TB 15233	X	TB 15233
5227	X	TB 15197	X	TB 15227
5233	X	TB 15237	X	TB 15237
5235	X	TB 15241	X	TB 15241
5237	X	TB 15247	X	TB 15247
5241	X	TB 15251	X	TB 15251
5244	X	TB 15244	X	TB 15244
5247	X	TB 15257	X	TB 15257

NOTE: CONTINUED ON SHEET 2.

Figure A-GAAAA - Sheet 01
Effectivity by MSN/SN/PN

N_SB_571198_E_AAA_01_02

EASA response:



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1A) Comment not agreed: the RH / LH outer flap (tab) s/n alone is adequate to identify a suspected part. Operators may voluntarily include in their traceability system other information (including flap P/N, based on Airbus documents). It is confirmed that there are no 2 LH outer flap, or 2 RH outer flap, having the same s/n

1B) EASA confirms that parts listed in Appendix 1 are only eligible for installation on A318/A319/A320 models, and parts listed in Appendix 2 are only eligible for installation on A321 models. Clarifications have been added in the final AD

Commenter 2: Aircorsica – Alexandre Haas – 05/06/2020

Comment # 2

A. The APPENDIX 1 and 2 list the parts with S/N but without Part Number. This missing information is a problem to identify the rotables and to integrate the document in a maintenance software

B. About the IHT Part. We propose to add the application « for A321 » or the corresponding modification number for the flap tab installation, at the Definition Paragraph . In our case we have only A320 in our fleet. As we do not find record on Tab S/N, we envisage to a physical check.. But Flap tabs are not installed on A320. The information about A321 is only quoted in the title of the appendix 2 in page 11.

C. The Note 2 which concerns Appendix 1 and 2 is between the 2 appendixes, we propose to move it before or after the appendixes.

EASA response:

2A) Comment not agreed: See EASA answer to comment 1A.

2B) Comment agreed. The definition of WM part has been updated.

2C) Comment agreed. Final AD has been updated.

Commenter 3: United Airlines – Ali Nowrouzi – 18/06/2020

Comment # 3

3A) United Airlines (UAL) recommend that the new EASA AD include a note stating:



Note: The effectivity as defined in the service bulletin is based on original delivery. Since the flaps are removable structural components, operators should consider the possibility that flaps have been moved to MSN's other than those listed in the service bulletin.

3B) We also recommend EASA consider to include outboard flap assembly part numbers in new AD per Airbus ISI: 57.50.00022.

EASA response:

3A) Comment noted: Note 2 and Note 3 in the final AD address this comment.

3B) Comment not agreed: See EASA answer to comment 1A.

Commenter 4: Delta Air Lines – James Thompson – 23/06/2020

Comment # 4

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 19-100R1, dated 29 May 2020

(B) Airbus Service Bulletin (SB) A320-57-1198, dated 24 January 2017

(C) Airbus Service Bulletin (SB) A320-57-1190, Revision 01, dated 05 September 2018

(D) EASA Airworthiness Directive 2019-0012, dated 24 January 2019

(E) Airbus In-Service Information Reference 57.50.00022, dated 03 December 2019

(F) Airbus Service Bulletin (SB) A320-57-1198, Revision 01, dated 15 June 2020

4A) Upon comparison of Reference (A) Appendix 2 with Reference (B) Figure A-GAAAA, it is apparent that the list of Suspected WM Parts has been supplemented from the version published within Reference (D) Appendix 1 with LH and RH Flap Tab Serial Numbers. According to Reference (E), the Flap Tabs are not considered AIR recordable, i.e. no digital records were kept of which Flap Tab was installed onto a specific MSN. Because these records are not reported to operators, operators will have considered the Flap Tab assemblies as repairable LRUs, which are traditionally not tracked by Serial Number. While it was reasonable to claim compliance with Reference (D) via paragraph (4) when the Suspected Parts list within Reference (D) Appendix 1 was limited to the Outer Flap Serial Numbers, the proposed inclusion of Outer Flap Tab Serial Numbers within the superseding rule introduces a tracking burden which is unreasonable should an operator wish to continue compliance with the proposed Reference (A) paragraph (5). As an alternative, EASA should simply require that all of the Outer Flap Tabs within the Suspected Parts list be returned to Airbus. As a secondary alternative (or perhaps as a supplement to the primary alternative), EASA should add a paragraph to the final rule which would prohibit the



ale/exchange/transference of any Outer Flap Tabs with Serial Numbers which are included within Reference (D) Appendix 2, except to Airbus, without having first inspected them in accordance with the proposed Reference (A) paragraphs (1) and/or (2), as applicable to aircraft Group.

4B) It is explained within the Reason paragraphs of Reference (A) that a detailed safety assessment was performed on the Outer Flap components and that discrepant parts meet static load capabilities but that the certified fatigue life is in question. If this is indeed the case, why is the compliance time based upon calendar dates? The authorized window for accomplishment of inspections and for reconciliation of findings should be based upon the total flight cycles of the affected component.

4C) Both Reference (B) and Reference (C) contain part numbers (as column headers) within their Suspected Parts lists. While it would be tempting for operators to assume that these part numbers to be Outer Flap or Outer Flap Tab part numbers, it is important to appreciate that these part numbers are sub-parts within the Outer Flap assemblies (indeed not even included within Flap CMMs). A technician would have a difficult time confirming the part numbers of these riveted sub parts. While Reference (A) does not include these part numbers within its appendices, it would be helpful to include a remark that states that the part numbers contained within the required Service Bulletins' figures are not indicative of the part numbers involved in the quality escape and bounded by the serial number effectivity tables in Reference (A) Appendices.

4D) Reference (F) was issued after the issuance of Reference (A). While Reference (F) has updated the Suspected Parts table's location from Reference (B) Figure A-GAAAA to Reference (F) Appendix and has updated the table's effectivity to be in agreement with Reference (A) Outer Flap serial numbers, the effectivity update does not appropriately encompass the scope of the quality escape. Because the potentially discrepant (WM) parts are limited to the Outer Flap Tab and not to the Outer Flap itself, Reference (A) should include a requirement that when accomplishing inspections of A321 Outer Flaps according to paragraph (1) or (2), that Outer Flap Tab Serial Numbers must first be compared against the effectivity table within Reference (A) Appendix 2 prior to performing any Reference (F) eddy current measurements.

4E) Reference (F) procedure includes the following step {3.C.(1).(b)}:

Identify the PN and Serial Number (SN) of the outer flap, refer to Ref. Appendix APPLICABILITY BY MSN/SN/PN:

1 If PN and related SN not found:

a No further action required.

2 If PN and related SN found:

a Go to the next step.

There are three problems with this step:

First, the step requires a check of the Outer Flap Part Number. The part numbers given within the Appendix are not the part numbers of the potentially discrepant Outer Flaps. As is explained within Reference (E), the Outer Flaps can have the following part numbers: Left-Hand; D57585501016, D57585501018 D57585501020, Right-Hand; D57585501017, D57585501019, D57585501021. None of these part numbers agree with part numbers D5758624421600 or D5758624421700 which are given within Reference (F) Appendix. While D5758624421600 or D5758624421700 are included within



SRM FIG. 57-53-21-07-A, item 005, a technician would likely be unable to confirm these part numbers during execution of this procedure. Inclusion of this step might prevent the inspection of a potentially discrepant part.

Second, the quality escape occurred on Outer Flap Tab parts, not on the Outer Flaps themselves. If Flaps Tabs, which again are typically not tracked by serial number as they are not AIR recordable, have been exchanged between two aircraft, a check of the Outer Flap serial number without a check of the Outer Flap Tab serial number could result in missing a check of an Outer Flap Tab serial number now included within Reference (A) Appendix 2.

Third, the impetus for assignment of the inspection to a given aircraft would be the fact that the effectivity tables within Reference (A) Appendix 2 included that aircraft's MSN. If an Outer Flap is checked for a serial number from Reference (F) Appendix and it is not found, one could reasonably conclude that the Outer Flap had been replaced. If it had been replaced, then one could further assume that the part was part of an off-wing rotatable pool. If two Outer Flaps are undergoing off-wing repair proceedings and one has a serial number that is part of the effectivity list and the other is not, it is conceivable that a potentially discrepant Flap Tab could be moved from one serial number Outer Flap to the other. The Outer Flap with a serial number not contained within the effectivity list might later be installed onto an aircraft with an Outer Flap Tab that never received an inspection, and with nothing tracking against the compliance window. The 3.C.(1).(b) step should state to confirm that the previously removed Outer Flap has been accounted for prior to stopping work on that wing position and claiming credit for the AD.

4F) Similar to Reference (F), Reference (C) should be updated to include Outer Flap Tab Serial Numbers for A321 MSNs so that Reference (C) agrees with Reference (A) effectivity definition, and so that the appropriate aircraft part (Outer Flap Tab) is targeted for evaluation.

EASA response:

4A) Comment not agreed. An EASA AD cannot require actions on not installed parts other than criteria for/prohibition of installation (e.g., an EASA AD cannot require to send a part to the TCH), unless this is strictly required to manage the unsafe condition. The AD does not require to implement s/n traceability for outer flap tab. Paragraph (5) is mainly supposed to give credit for those a/c, which MSN is not listed in appendix 1 or 2 of the AD, and on which outer flap (tabs) have not been replaced since delivery: these a/c can be identified as Group 3.

4B) Comments not agreed. Compliance Time has been defined in calendar time based on average use of the fleet to ensure inspection done within a fix time to cover long term rotability.

4C) Comment noted and forwarded to Airbus for possible future update of the SBs.

4D) Comment not agreed. The AD identifies which parts must be inspected, and the compliance time.

4E) Comment noted and forwarded to Airbus for possible future update of the SBs. No changes to the AD are deemed required as it identifies which parts must be inspected, and criteria for installation of a suspected/ affected part.

4F) Comment noted and forwarded to Airbus for possible future update of the SBs.



Commenter 5: British Airways – Adrian Hewes – 25/06/2020**Comment # 5**

5A) BAW politely request that the Part Numbers of the Outer Flaps and Tabs detailed in Appendix 1 & 2 be provided. Many Operators control components coming into their stores systems primarily via Part Number.

5B) BAW politely request that Appendix 1 & 2 are also provided in Excel Format. This would aid Operators to more easily reconcile the large amount of information provided in Appendix 1 & 2.

5C) BAW politely request that the Notes provided in the PAD are repositioned within the layout of the PAD. Note 2 applies to both Appendix 1 & 2 but is currently positioned at the end of Appendix 1.

EASA response:

5A) Comment not agreed: See EASA answer to comment 1A.

5B) Comment agreed. A courtesy excel copy of Appendix 1 and Appendix 2 is included in the zip file.

5C) Comment agreed – see EASA answer to comment 2C.

