

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-102R2

[Published on 09 November 2020 and officially closed for comments on 23 November 2020]

### Commenter 1: Wamos Air – David González Herrero – 11/11/2020

#### Comment # 1

Taking into account the new definition of an “Affected Part” and the entire PAD content, it may be possible to generate confusion about the compliance status of those Oxygen Supply Solenoid Valves with a DOM 2016 or before which have been tested on-wing (with no findings) before the effective date of this PAD (the future AD) in accordance with the applicable Airbus SB.

With this said, we understand that adding a “Credit for Previous Actions” paragraph would be really useful for the operators to classify those affected valves already tested on-wing in accordance with the applicable Airbus SB.

#### EASA response:

**Comment not agreed. Airbus has confirmed to EASA that the solenoid valves (SV) that were tested on wing using the applicable Airbus SB cannot be excluded from Affected Part. When an SV is removed from an aeroplane on which it was tested and re-installed on another aeroplane, it must be tested again. However, for SV that were tested on wing using the applicable Airbus SB, before the effective date of the AD, and those SVs remained installed on the same aeroplane, it is confirmed that Credit can be taken for those actions. This is confirmed in the Final AD with the sentence ‘Required as indicated, unless accomplished previously:’.**

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

### Commenter 2: Deutsche Lufthansa – Jan Papenfuss – 19/11/2020

#### Comment # 3

In our opinion, the latest revision is not an improvement on the problems already described in revision 1. In addition, the context of EAD and Airbus SB leads to an immense effort to track the units manually and to check if they are AD-compliant. A simple and at the same time very relieving step here



would be for Airbus either to include the required flow test directly into the AMM or at least to insert a note that refers to the SB or EAD. Ultimately, Airbus is making it very easy for themselves and very difficult for operators to be 100% AD-compliant. I ask you to take the above mentioned points into account in the final EAD version.

**EASA response:**

**Comment acknowledged. EASA consider that the comment is more addressed to Airbus than to the PAD content and has therefore been passed to them for disposition.**

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

**Commenter 3: Swiss International Air Lines – Markus Thurnherr – 20/11/2020**

**Comment # 4**

- A. With Rev 02 of the PAD, EASA has changed the definition of “Affected part”. The new definition additionally excludes parts which were inspected per the instructions of Zodiac SB DVE90-35-348. Per our understanding, the Zodiac SB only applies to parts which have already failed the test per Airbus ISB. Furthermore, the Zodiac SB requires the performance of an overhaul per CMM after the inspection. This requirement in the Zodiac SB is independent of the inspection results.

Consequently, we believe that the definition of “affected part” is now redundant: any part which has been inspected per Zodiac SB will also be overhauled per CMM after 2016, which is already included in the definition of “affected part”.

Therefore, per our conclusion, the change made with Rev 02 of the PAD brings no benefit for the industry. Moreover, it might lead to the potential misinterpretation that the inspection-part of the Zodiac SB can be applied to any component, without performing an overhaul. We would like to ask EASA to clarify this point.

- B. From our point of view, it would be a significant benefit for various operators if there was a remark in the Airbus AMM-Task for the solenoid valve installation about the requirements of this AD.

We have noted in the EASA “Comment Response Document” that a similar request was already made in response to PAD 19-102 [original]. EASA has replied that the relevant inspection requirement cannot be transferred into the Airbus AMM for legal reasons (AMM is not an EASA approved document). While it might not be possible to transfer the inspection requirement into the AMM, we still believe that Airbus could add some information about the AD / the inspection requirement into the AMM installation task. This would add an additional safety-layer for the benefit of the entire industry. Therefore, we would like to ask EASA to clarify this point together with Airbus.



**EASA response:**

**A. Comment noted. For some operators, it seems that the reference to the Zodiac SB is useful. So, even if considered redundant by the commenter, EASA has decided to keep it in the Final AD with a rewording. Indeed, the CMM is the general document for parts overhaul in shop maintenance. The Zodiac SB is for use by repair stations and applicable especially for parts having failed the on wing test in accordance with the applicable Airbus SB. Listing all involved documentation in this case should not be seen as redundancy.**

**B. Comment acknowledged. See EASA answer to Comment #2.**

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

**Commenter 4: Cathay Pacific Airways – Peggy Lin – 23/11/2020**
**Comment # 5**

CPA would like to amend some comments on subject PAD, please find the updated one as below. Sorry for any inconvenience caused to you. CPA is reviewing the PAD 19-102R2 and have below queries on the description of “Affected part”.

Refer to the requirement in “Affected part”, CPA understands that the unit can be accepted either have been overhauled after 2016 using the applicable CMM or passed an inspection (no defects found) in accordance with the instructions of the Zodiac SB DVE90-35-348 Revision 01 or Revision 02. Can EASA include the specific CMM reference and revision number in this PAD?

**EASA response:**

**Comment acknowledged. EASA consider that the CMM document reference is known by operators and the use of any revision thereof is acceptable for accomplishing the tasks.**

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

