

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-108

[Published on 17 June 2019 and officially closed for comments on 15 July 2019]

**Commenter 1: AMAC Aerospace Switzerland AG – Pavol Sikula – 17/06/2019**

### Comment # 1

A. We feel GROUP 4 needs to be defined for this PAD 19-108 as proposed bellow for A/C having not embodied Airbus SB A320-28-1216 original issue and not having embodied Airbus SB A320-57-1193.

Proposed GROUP 4 ( covering remaining A/C not belonging to GROUP 1-3 of this AD):

“Group 4 aeroplanes are those having Not embodied Airbus SB A320-28-1216 original issue and not having embodied Airbus SB A320-57-1193.” AD par (3) than should be amended: (3) From Group 3 and Group 4 aeroplanes....

B. AD par (1) is not considering compliance time for A/C older than 144 Months. We propose to add compliance time for those A/C older than 144 MO that the action needed do not need to be done immediately after AD effective date.

### EASA response:

**1A) Comment not agreed: Whereas group 1, 2 and 3 are aeroplanes actually equipped with a fuel level sensor bracket having old P/N, the proposed Group 4 would include aeroplanes not supposed to be affected by the issue tackled by the AD.**

**Moreover the paragraph (4) prevents the installation of parts which could lead to the potential unsafe condition.**

**1B) Comment noted. Mod 160029 has been certified less than 12 years ago, consequently there are no Group 1 aeroplanes having more than 12 years since date of manufacture.**

**No changes have been made to the Final AD in response to these comments.**

**Commenter 2: Singapore Airlines – Soh Kian Ann – 18/06/2019****Comment # 2**

It was noted that aeroplanes belonging to different groups as defined in EASA PAD 19-108 have different compliance requirement. However the grouping is not define for aeroplanes which do not embodied Airbus mod 160029, Airbus Service Bulletin (SB) A320-28-1216 and SB A320-57-1193. Please note that some of the aeroplanes from MI and TTW fall under this category.

Therefore, please kindly advise the grouping for these aeroplanes.

Groups:

Group 1 aeroplanes are those having Airbus mod 160029 embodied in production.

Group 2 aeroplanes are those having embodied Airbus Service Bulletin (SB) A320-28-1216 original issue and SB A320-57-1193.

Group 3 aeroplanes are those having embodied Airbus SB A320-28-1216 original issue and not having embodied Airbus SB A320-57-1193.

**EASA response:**

***Comment noted. For an aeroplane affected by this AD, and not included in any of the Groups, paragraph (4) is applicable, to prevent installation of parts which could lead to an unsafe condition. See also EASA answer to comment 1A.***

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

**Commenter 3: Bangkok Airways – Pajaree Srisatsue – 18/06/2019****Comment # 3**

Regrading to the applicability of PAD 19-018 are not clear. BKP cannot identify to any group of aeroplanes in this PAD.

- Aeroplanes in BKP fleet not having mod 158133 embodied in production.
- Aeroplanes in BKP fleet not having mod 160029 embodied in production.



- Aeroplanes in BKP fleet not having embodied SB A320-28-1216 at any issue and also SB A320-57-1193.

**EASA response:**

**See EASA answer to comment 1A**

**Commenter 4: Gowair – Francisco Gutiérrez – 18/06/2019**
**Comment # 4**

We checked the PAD 19-108 and we have a doubt in case an aeroplane doesn't belong to any Group, the case with MOD 160029 NOT embodied in production and with SB A320-28-1216 original issue NOT having embodied.

**EASA response:**

**See EASA answer to comment 1A**

**Commenter 5: Vueling – Guillermo Sánchez Contreras – 19/06/2019**
**Comment # 5**

After reviewing PAD 19-108, we would like to get some clarifications regarding applicability and groups.

As stated, all A319, A320 and A320N MSN without MOD 158133 are affected, and then grouped in 3 different groups:

- 1. POST MOD 160029
- 2. POST SB 28-1216 AND POST SB 57-1193
- 3. POST SB 28-1216 AND PRE SB 57-1193

This leaves some aircrafts theoretically affected by the PAD, but out of those 3 groups. For instance, we have 51 Aircrafts PRE MOD 158133 not fitting any of those groups. (see attached document, column H).

In "Reason" is explained that only aircrafts POST 160001 OR SB 28-1216 + 57-1193 are affected, which would leave out of the applicability of PAD aircrafts not categorized ("group missing" as per attached doc).



Could you please confirm:

- Aircrafts affected by PAD
- Group definition

**EASA response:**

**See EASA answer to comment 1A**

**Commenter 6: Cathay Pacific Airways – Peter Pang – 09/07/2019**

**Comment # 6**

Cathay Pacific have reviewed the EASA Proposed AD issued on 17 June 2019, PAD No. 19-108, regarding the Airbus A320 Fuel Level Sensor Support Bracket and would like to provide the following input.

In the PAD Applicability section the following is stated.

“Airbus A318-112, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A320-251N, and A320-271N aeroplanes, all manufacturer serial numbers (MSN) except those having Airbus modification (mod) 158133 embodied in production.”

Cathay’s A320-232 fleet does not have Mod 158133 embodied at production, therefore, according to this paragraph it should be applicable to this PAD.

However, in the PAD Definitions section the following is stated.

“Group 1 aeroplanes are those having Airbus mod 160029 embodied in production.

Group 2 aeroplanes are those having embodied Airbus Service Bulletin (SB) A320-28-1216 original issue and SB A320-57-1193.

Group 3 aeroplanes are those having embodied Airbus SB A320-28-1216 original issue and not having embodied Airbus SB A320-57-1193.”

Cathay’s A320-232 fleet does not have Mod 160029 embodied at production. At the same time Cathay’s fleet have not embodied Airbus SB A320-28-1216 (all revisions) & is not in the effectivity of Airbus SB A320-57-1193 (all revisions). Thus, Cathay’s fleet does not fit the definition of any of the Groups.

Cathay have contacted Airbus for input & they have advised that, given the above, Cathay’s A320-232 fleet is not applicable to the requirements of this PAD (please see attached).



Cathay would like to confirm with EASA that Cathay's A320-232 fleet is indeed not applicable to the requirements of this PAD given the above configuration of our fleet.

If this is the case, Cathay would like to request additional exception language to be added to the Applicability section to clarify Cathay's A320-232 fleet's exclusion from the requirements of this PAD (such as below).

"... except those not having Airbus modification (mod) 160029 and except those not having embodied Airbus Service Bulletin (SB) A320-28-1216 original issue."

***EASA response:***

***See EASA answer to comment 1A***

***Commenter 7: United Airlines – George P. Zombanakis – 10/07/2019***

***Comment # 7***

In reference to this PAD under ATA 57, United Airlines would like to provide the following comments:

- A) The title in the subject PAD we believe that needs to be changed and ATA 28 to be used since both related Airbus Mods 158133 and 160029 listed in this PAD are ATA 28 actions. In addition, the Fuel Level Sensor and Support Bracket installed via an ATA 28, SB A320-28-1216.
- B) In addition, the Fuel Level Sensor Brackets P/Ns listed in the PAD are in the A319/A320 IPC Section 28-46.
- C) United Airlines is in the final stages for the implementation of the Airbus SB A320-28-1216 in the entire current fleet and has not incorporated or planning to embody Airbus SB A320-57-1193 in the current fleet.
- D) The listed publications in the PAD SB A320-28-1238 R01 and SB A320-28-1239 R01 are Not Applicable to UAL's current fleet.
- E) The current UAL fleet is under the SB A320-28-1216, configuration 001 and PAD Group 3 that in accordance with the instructions we will need to contact Airbus if UAL ever decides to incorporate SB A320-57-1193.
- F) SB A320-28-1216 R01, Configuration 001, has no retroactive instructions for the bonding resistance check between the support bracket and Rib 24. Refer to SB A320-28-1216 R01, page 59 and Figure A-UBAAA, sheet 01.

***EASA response:***

***7A and B) Comment agreed. Final AD has been updated accordingly***



***7C, 7D, 7E, and 7F Comment noted. No changes have been made to the Final AD in response to this comment.***

***Commenter 8: Delta Air Lines – Brandon Soileau – 16/07/2019***

***Comment # 8***

The PAD is applicable to A318, A319, and A320 aeroplanes except those having (mod) 158133 embodied in production. The applicability of the PAD should be restricted to Airbus A318-112, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A320-251N, and A320-271N aeroplanes, all manufacturer serial numbers (MSN) having embodied Airbus SB A320-57-1193.

Airbus SB A320-57-1193 is a major modification and is only available through Airbus's Request for Change/Retrofit Modification Order (RFC/RMO) procedure. Applicability of the PAD should be controlled by Airbus through the effectivity of SB A320-57-1193. Operators that have chosen to not modify their aeroplanes should not be required to track compliance with the PAD. The unsafe condition addressed by the PAD does not exist on their aeroplanes.

***EASA response:***

***Comment not agreed – The AD provides requirement (4) to prevent installation of parts which could lead to the potential unsafe condition, and this requirement is founded only with the current applicability of the PAD.***

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

