

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-112

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Commenter 1: Delta Air Lines – Rafael Miranda – 11/07/2019

Comment # 1

First, Delta requests the inspection accomplishment be revised from 4 to 6 months as shown:

Inspection(s):

(1) Within 6 months after the effective date of this AD, inspect the oxygen containers and the installation of adjacent panels located in all passenger supply channels in accordance with the instructions of the Airbus Alert Operators Transmission (AOT) A35P015-19.

Delta requests the time of accomplishment change to:

- Allow operators time to properly schedule the inspection accomplishment in a suitable maintenance station.
- Allow operators time to obtain the necessary parts (fasteners and adjacent panels) to correct any discrepancies found.
- Allow Delta to properly schedule the inspection and corrective action as needed on 11 aircraft affected Second, Delta is concerned that the AOT restricts the operator's time of inspection accomplishment and subjects the operators with an undue burden by setting the inspection timescale to be 5 months from the issue date of the AOT A35P015-19 Rev 01, which is 19 June 2019.

Therefore, Delta requests the Airbus AOT A35P015-19 be revised to reflect a time of accomplishment to be 6 months from the issue date of Rev 02 or 6 months after the EASA AD is issued as shown:

4.1.1 ACCOMPLISHMENT TIMESCALE

BEG REV

The inspection as per paragraph 4.2 must be performed within 6 months from the issue date of the AOT A35P015-19 Rev 02, or within 6 months from the date of issue of the EASA AD applied to this AOT.

END REV

This change will allow operators to truly have 6 months, or the time to accomplish the inspection and corrective action as mandated.

Third, Delta is concerned Airbus or its supplier will be unable to provide all the required parts, since the entire cabin or shipset could be affected on each aircraft.

- All operators do not know if all the oxygen containers are affected or only few. And if all the units on the aircraft are affected, then the quantity of parts required will be a critical part for accomplishing the corrective action.
- If the corrective action cannot be accomplished before next flight as stated in the PAD Corrective Action paragraph, then operators will have aircraft grounded until the parts are made available.

This will pose an undue burden on the flying public and impact the transportation services temporarily.

Delta requests Airbus and its suppliers to have or ensure parts are available on AOG basis to support this proposed mandate.

EASA response: Comment not agreed.

Technical speaking the objective of this inspection was to ensure that all PSC elements are properly fixed onto their rails and therefore the required minimum gaps between the oxygen containers and associated other PSC elements of 2mm are ensured.

EASA considers enough time to accomplish the required actions.

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

