

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-125

[Published on 15 July 2019 and officially closed for comments on 12 August 2019]

Commenter 1: Air France – Benjamin Pouyet – 15/07/2019

Comment # 1

A. Instructions for aircraft already repaired before EASA AD publication are missing.

We have several aircraft in our fleet which have been repaired as per Airbus instructions with a dedicated inspection program thru RDAS (which mentioned ALI task 531129 “impacted” by the repair).

Could you please introduce chapter to take into account aeroplanes that have been repaired according to Airbus instructions and covered by dedicated RDAS before effective date of the future AD?

B. Terminating action chapter: Is SB A320-53-1329 performed at or after 29400FC (from A/C EIS) be considered as final fix of repetitive inspections?

EASA response:

1A) Comment agreed. Final AD has been amended accordingly

1B) Comment not agreed. To be noted anyway that, after embodiment of SB A320-53-1329 at 29400 FC since a/c first flight, or later, next inspection would be due beyond the ESG. See also Note 1 of the AD. No changes have been made to the Final AD in response to this comment

Commenter 2: N/A – Saeedeh Daneshvar – 19/07/2019

Comment # 2

I am asking for information about applicability section of that PAD, could you more explain about "A319 airplanes on which Airbus mod 28238, mod 28162 and mod 28342 were embodied in production."?

Does the above sentence mean that all modification numbers must be embodied simultaneously in production or even one of them was embodied in production is enough to comply with the PAD?

EASA response:

Comment noted: for A319 aeroplanes used as corporate jet, all the 3 mods (28238, 28162 and 28342) are embodied in production. It is not possible to validate these 3 MODs together in service to have the a/c not affected by this AD. No changes have been made to the Final AD in response to this comment

Commenter 3: Lufthansa CityLine – Joerg Auterhoff – 23/07/2019

Comment # 3

Groups: Group 1 are A320 aeroplanes that have not embodied Airbus mod 22058 nor mod 21999 nor Airbus SB A320-53-1329. Group 2 are aeroplanes that have not embodied Airbus SB A320-53-1329, and are not Group 1. Group 3 aeroplanes are those that have been modified in service per Airbus SB A320-53-1329 before 29 400 flight cycles (FC) since aeroplane first flight.

Do A320 aeroplanes mean only the A320, or does it mean all A318 – A321 aeroplanes?

EASA response:

EASA confirm that only A320 aeroplanes are included in Group 1. No changes have been made to the Final AD in response to this comment

Commenter 4: easyJet – Alastair Reid – 08/08/2019

Comment # 4

Following review of the technical content associated with EASA PAD No.: 19-125, EZY would like to offer the following comments:

A. Per Para (1) of PAD 19-125, inspection threshold and interval is defined within Table 1. Inspection Threshold is defined from Aircraft First Flight or within * FC from last ALI task 531129 inspection.

B. Following communications with Airbus, in event of historical repairs leading to Windshield Framing Replacement per case specific RDAS approval (Pre SB A320-1329), ALI 531129 (and SB A320-53-1331 once available) inspection counter can be reset per requirements of RDAS approval for the



affected area (i.e. windshield and continuity replaced, next inspection due 30600FC from repair embodiment for the entire ALI 531129/SB A320-53-1331 area).

EZY have reviewed the PAD and confirm there is no statement to reflect any limitations applied following repairs covered in accordance with Airbus Repair Design Approval Sheet (RDAS), as such EZY kindly request a statement to reflect the following be included within Para (1) within the PAD/AD:

“For an aeroplane that has been inspected per ALI task 531129 or in accordance with the inspection SB, and repaired in accordance with Airbus Repair Design Approval Sheet (RDAS), accomplish the next due inspection of each repaired affected area in accordance with, and within the compliance time as specified in, Airbus RDAS, as applicable.”

EASA response:

Comment partially agreed: Airbus instructions received following an inspection in accordance with SB A320-53-1331 are accepted under the provision of “unless previously accomplished” statement, and paragraphs (2) or (3) of the AD.

See also EASA answer to comments 1A. Final AD has been amended accordingly

Commenter 5: British Airways – Adrian Hewes – 09/08/2019

Comment # 5

Within SERVICE BULLETIN No.: A320-53-1331 REVISION No.: 00 - Jan 14/19:

The following option is provided on both page 56 (**CONF 001) and page 60 (**CONF 002)

C If crack is found on the continuity fittings only:

or

- Report to AIRBUS the crack finding on continuity fitting and nil finding on windshield frame within 90 days and do the two following steps before next flight:

. Replace both continuity fittings as per repair instruction R531-12919 using the kits defined in the repair instruction.

. Repeat the inspection at the interval given in the PLANNING INFORMATION Paragraph E.(2).

Within EASA PAD No.: 19-125 Issued: 15 July 2019 the following is provided:



Corrective Action(s):

(2) For Group 1 and Group 2 aeroplanes: If, during any inspection as required by paragraph (1) of this AD, any crack is detected, before next flight, modify the aeroplane in accordance with the instructions of Airbus SB A320-53-1329, or contact Airbus for approved instructions and accomplish those instructions accordingly.

BAW (British Airways) wishes to understand if the option to carry out the replacement of both continuity fittings as per SERVICE BULLETIN No.: A320-53-1331 by repair IAW R531-12919, if crack is found on the continuity fittings only, is available to operators.

Can EASA please confirm that that the wording within EASA PAD No.: 19-125, "or contact Airbus for approved instructions and accomplish those instructions accordingly", provides authority for the SERVICE BULLETIN No.: A320-53-1331 option, to replace both continuity fittings as per repair instruction R531-12919, if crack is found on the continuity fittings only?

If it is acceptable to EASA to replace both continuity fittings as per repair instruction R531-12919, if crack is found on the continuity fittings only. Please could EASA consider amending the wording within "Corrective Action(s)" to clarify that this as an option for operators?

EASA response:

Comment agreed: SB A320-53-1331 repair solution as detailed above is an acceptable alternative solution. Final AD has been amended accordingly.

Commenter 6: Delta Air Lines – W. Ryan McGehee – 09/08/2019**Comment # 6**

Reference /1/: EASA PAD 19-125 dated July 15, 2019

Reference /2/: Airbus SB A320-53-1331, Revision 00 dated January 14, 2019

Reference /3/: Airbus SB A320-53-1329, Revision 00 dated December 21, 2018

A. Reference /3/ is provided as the method by which findings 'Identified during accomplishment of Reference /2/ are rectified. Reference /3/ is not applicable to aircraft on which MOD 157707P14872 has been embodied during production. How do operators rectify findings to post-MOD 157707 aircraft?

B. Will the proposed rule prompt a revision to the 2018-0288 rule to remove the requirement to inspect the windshield node as a part of ALS Part 2?

C. Within the Reference /1/ "Definitions" section there is a NOTE 1 which indicates that, for airplanes which are modified per Reference /3/ after or at 29400 FC, no further action is required up to the Publication Trigger. This note reads like a terminating action, but the Terminating Action paragraph



lists "None". Please explain. Could aircraft proactively be modified (after 29400FC) according to Reference /3/ and avoid the repetitive inspection requirement altogether?

D. There should be a paragraph which provides credit for previous actions. An operator may have been instructed to execute SB A320-53-1329 in response to a finding during accomplishment of ALI 531129. If so, that aircraft should be excluded from the applicability.

E. There should be a paragraph which provides credit for previous actions. An operator may have been instructed to execute Reference /3/ in response to a finding during accomplishment of ALI 531129. If so, that aircraft should be excluded from the repetitive inspection requirements.

F. Reference /2/ and Reference /3/ include a long list of Return To Service tests within their respective 3.D TEST paragraphs. These RTS tests do not lend themselves to the rectification of the airworthiness concern addressed by the proposed rule. Prior to release, the EASA should ask Airbus to disconnect paragraph 3.D from those which are Required for Compliance (RC).

G. Reference /3/ calls for the renewal of protective finish, which requires the application of surface pretreatment, Airbus calls for the use of CML 10ABC1 (tank Alodine), when CML 10ABE1 should have been used. Recommend postponing publication of final rule until Airbus has corrected this CML callout.

EASA response:

6A – When repair instructions are not (yet) available, operators may contact Airbus for instructions and accomplish those instructions.

6B – Impact on ALS is addressed by paragraph (5) of the AD. No revision of EASA AD 2018-0288 is expected.

6C – See EASA answer to comment 1B

6D/6E – Previous embodiment of SB A320-53-1329 (for any reason) is taken into account in group definition and in Note 1 of the AD. Inspections already accomplished in accordance with SB A320-53-1331 are accepted under the provision of “unless previously accomplished” statement

6F – Comment noted and transferred to AIRBUS for possible SB revision.

6G – Comment noted and transferred to AIRBUS for possible SB revision.

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



Commenter 7: United Airlines – Neil Sorensen – 09/08/2019**Comment # 7**

We request that the final AD allow the accomplishment of ALI 531129 instead of SB A320-53-1331 for up to 120 days after the effective date of the final AD. Because ALI 531129 is currently mandated per ALS Part 2, it would burden operators to change their maintenance program and task cards on the same day the AD is effective. Some operators may have aircraft scheduled and/or accomplishing the ALI task when the final AD becomes effective. These cases may drive duplication of work by the ALI and SB documents. Having to re-accomplish the same inspection stated by a different source document would yield the same inspection results. Because both ALI 531129 and SB A320-53-1331 accomplishes the same NTM 53-11-29 inspection procedure, we see no reason the ALI 531129 task cannot continue being accomplished for up to 120 days. This will give operators a reasonable amount of time to incorporate the new AD requirements and simultaneously withdraw the ALI task within their maintenance program. Otherwise, implementing the new AD requirements immediately on the AD effective date increases risk of AD non-compliance due to rapid implementation.

EASA response:

Comment partially agreed. The AD is effective 14 days after publication, allowing a reasonable time to update A/C maintenance documents. Paragraph (7) has been added to the final AD, accepting ALI 531129 as alternative method of compliance for the next due inspection.

