

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-169

[Published on 10 September 2019 and officially closed for comments on 08 October 2019]

Commenter 1: Latam Airlines Chile – Gabriela Quijada – 13/09/2019

Comment # 1

Ref.1: SB A320-53-1448 Rev. 00

Ref.2: SB A320-53-1449 Rev. 00

If we consider that these Inspection Service Bulletins (ISB) retain the Detailed Inspection (DI) of the spotface around the fastener hole (Ref. NTM 51-90-00) specified per ALI Task 531125 and add a Special Detailed Inspection (SDI) of the fastener hole (Ref. NTM 51-10-01).

Desired Action:

Does accomplishment of inspections and corrective actions on an aeroplane as specified by this PAD allow cancellation of ALI tasks 531125 from the approved Aircraft Maintenance Program?

EASA response:

Comment noted. ALI task 531125 has been removed from the ALS Part 2 revision 8, issued after the publication of PAD 19-169. ALS Part 2 revision 8 are acceptable for compliance with EASA AD 2018-0288. The final AD was amended accordingly including this information.

Commenter 2: Austrian Airlines – Erwin Fleberger – 25/09/2019

Comment # 2

Please provide information if accomplishment of inspections and corrective actions on an aeroplane, as required by this AD, allows cancellation of ALI tasks 531125 from the approved Aircraft Maintenance Program?

EASA response:



See EASA answer to comment 1

Commenter 3: Lufthansa Technik AG – Andreas Ott – 27/09/2019

Comment # 3

We have reviewed PAD 19-169 but can't understand the benefit of that new document. If the PAD will be released/published as a mandatory EAD all affected operators have to follow the ALI 531125 requirement and the EAD requirement as well.

Therefore LHT will request to revise the PAD and add the following paragraphs.

A. Cancellation of ALI: The EAD must provide a clear statement that with the effective date of the EAD the ALI has to be canceled and the inspection must be performed in accordance with the EAD and SB instructions. Otherwise it is required to follow both requirements ALI and EAD what doesn't make sense.

B. Credit of previous ALI accomplishment: Aircraft that are already above 48.000FC and which have been inspected in accordance with ALI instructions take credit from last inspection have to be inspected in normal EAD interval, counted from the last performance of ALI.

C. Repairs/Replacement: In case of repairs or window frame replacement the EAD has to reflect the possibility to reset the inspection threshold.

From LHT point of view there is no benefit if the EASA AD will be released before the already announced repair and/or termination action is available. Therefore we will request the EASA not to release the EAD until a benefit can be included for the operator.

EASA response:

3A) See EASA answer to comment 1

3B) Comment not agreed. ISB inspection is not equivalent to the ALI inspection. The compliance time since last ALI inspection is provided by paragraph 1 of the AD.

3C) Comment agreed. Final AD has been updated to clarify the post repair/replacement applicable inspection program

Commenter 4: Delta Air Lines, Inc. – Ivana Gonzalez – 07/10/2019



Comment # 4**Reference:**

(A) Docket No. PAD-19-169; ATA 53 – Fuselage – Lateral Window Frame Upper Fastener Holes – Inspection

(B) Airworthiness Limitation Item (ALI) 53-11-25-02-1

(C) SB A330-53-1448 Rev 0

(D) SB A340-53-1449 Rev 0

SUMMARY:

Reference (A) proposes to adopt a new airworthiness directive (AD) for Airbus A318, A319, A320, and A321 aeroplanes. Previous accomplishment of Reference (B) (Detailed inspection of central/lateral window frame junction upper area around fastener holes) resulted in crack findings in fastener holes which were not subject to the detailed inspection (DET). Reference (A) proposes accomplishment of References (C) and (D), which redefines the area to be inspected, expands the inspection method requirements (DET and special detailed inspection (SDI)) and revises the inspection instructions. Delta has reviewed the proposed rule and concurs with the intent of the proposal.

DELTA'S COMMENTS

A). Reference (A)'s 'Reason' states the following with regards to why this PAD has been issued:

"During the accomplishment of the Airworthiness Limitation Items (ALI) task 531125 (Detailed inspection of central/lateral window frame junction upper area around fastener holes), crack findings have been reported in fastener holes which were not subject to the detailed inspection (DET)."

While Reference (C) and (D) Para 3.B.(1)'History', states the following about what has led to this PAD's issuance:

"In the frame of the A320 family mission re-evaluation, a new full scale fatigue test has been conducted and revealed crack findings at Right Hand/Left Hand side upper spot face and damages in the hole of lateral windshield framing near Frame 4.

Airworthiness Limitation Item (ALI) 531125 is applicable to lateral frame. In-service crack findings have been reported which have led to repairs or lateral window frames replacements."

The 'Reason' for PAD issuance given in Reference (A) implies that damage findings from accomplishing Reference (B) inspections are the sole driver for the release of Reference (A). References (C) and (D) however, indicate that accomplishment of both fatigue testing AND in-service findings resulting from Reference (B)'s accomplishment are the two drivers for Reference (A)'s issuance. To avoid confusion as to why this PAD is being issued, DAL requests review and replacement of the wording quoted above from Reference (A) so that it matches the quoted wording above from References (C) and (D).

B) Reference (A) discusses how crack findings per Reference (B) led to the development of this proposed rule mandating accomplishment of References (C) and (D) on all affected aircraft. During review of Reference (A), DAL noted that Reference (A) does not indicate that accomplishment of inspections



and corrective actions on an aeroplane, as required by Paragraph (1) of Reference (A) allows cancellation of Reference (B) from the approved Aircraft Maintenance Program of that aeroplane, on the basis of which the operator or the owner ensures the continuing airworthiness of each operated aeroplane. Note that References (C) and (D) state:

“This ISB will cancel and replace ALI 531125 and will add Special Detailed Inspection (SDI) (on top of visual as per ALI) at the area concerned.”

DAL requests review and clarification for operators on whether or not accomplishment of inspections and corrective actions mandated by this proposed Reference (A) constitute termination of Reference (B) inspections. DAL requests these clarifications are incorporated into Reference (A).

EASA response:

4A) Comment noted. Cracks were detected through the new full scale fatigue test and also in service in the frame of the ALI application. A clarification has been added in the final AD.

4B) See EASA answer to comment 1

