

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-172

[Published on 16 September 2019 and officially closed for comments on 14 October 2019]

### Commenter 1: All Nippon Airways – Hiroki Ando – 18/09/2019

#### Comment # 1

We request to change the applicability of AD from all manufacturer serial numbers to SB Effectivity. If the applicability is all manufacturer serial numbers, we have to continue to check on new airplanes. But we think it is not necessary to check on new airplanes because the effectivity of SBs is limited.

EASA PAD No.19-172:

Applicability:

A320-214, A320-216, A320-231, A320-232, A320-233, A320-251N and A320-271N aeroplanes, all manufacturer serial numbers.

Airbus SB A320-26-1110 original issue (SB example):

Effectivity by MSN

6772 6829 7124 7150 7195 7209 7236 7273 7309 7401 7417 7459 7466 7475 7480 7483 7486 7505 7508 7512.

#### EASA response:

***Comment agreed. To be noted that the inspection and possible corrective actions are required only for Group 1 aeroplanes, which are those actually embodying a SB as listed in Table 1 of the AD. An aeroplane listed in the applicability of a SB listed in Table 1 may not be a Group 1, depending on SB embodiment status on that aeroplane.***

***Final AD has been amended accordingly.***

**Commenter 2: Iran Air – Mostafa Beyrami – 03/10/2019****Comment # 2**

Referring to proposed AD 19-172, kindly be advised that as stated in applicability, issue is applicable for all MSNs of A320-214, A320-216, A320-231, A320-232, A320-233, A320-251N and A320-271N and also group 2 include the MSNs that none of SB listed in table 1, has been accomplished on them.

Per Modification Prohibition, Group 2 shall not be modified with any SB listed in the Table 1.

The question is : If an operator has an MSN in Group 2 (and its MSN not listed in the affected SB) and asks for modification (to comply with ETOPS Regulation), then AIRBUS as TC Holder will provide later revision of the SB.

As this operator shall request AIRBUS to include its MSN in the SB, then this operator automatically will modify its MSN with later revision of SB and not affected by AD.

May you consider this case out of applicability of the AD?

**EASA response:**

***Comment agreed. MSN not listed in the affected SB have been removed from the applicability of the AD. See also EASA answer to comment 1.***

***Taking into account the reduced applicability of the AD, an aeroplane as identified in Comment #2 is not affected by the AD.***

