

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-206

[Published on 21 November 2019 and officially closed for comments on 19 December 2019]

### Commenter 1: Cathay Pacific – Gary Chan – 26/11/2019

#### Comment # 1

Applicability: AD is applicable to A350-941 and A350-1041 all MSN. However, the reference Airbus SB A350-35-P013 is only applicable to a number of MSN.

- A. Group 1 definition: The AD states that “Group 1 aeroplanes are those that have an affected part installed”. Is this determined by aircraft delivery record / maintenance record or does it require physical inspection on aircraft to determine if any affected part is installed.
- B. Modification (1): Modification i.a.w. with the instructions of the SB for Group 1 aeroplanes. The SB is only applicable to a number of MSN. If an affected part is found on an aircraft that’s not on the SB applicable MSN range, operator cannot use the SB for modification as the MSN is not listed on the SB applicability list.

#### EASA response:

- A. **Comment noted. How to determine whether an aeroplane (MSN) is in Group 1 or Group 2 (having or not having an affected part installed) is at the operator’s discretion. The AD does not require any inspection or other instructions how to make that determination. However, the method should be acceptable to the competent authority (usually, State of Registry NAA).**
- B. **Comment not agreed. The Effectivity of SB (listed MSN) is based on Airbus delivery data – MSN configuration at that time. The AD takes into account the possibility that an affected part can be installed on another MSN (interchangeability) in service. This is the reason why EASA expands the Applicability when compared to the SB. The AD determines that the SB instructions are acceptable to be used, even if an MSN is not listed therein.**

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

## Commenter 2: Delta Air Lines – Jason Olmstead – 19/12/2019

### Comment # 2

#### Reference:

- (1) EASA PAD 19-206 issued November 21, 2019
- (2) Airbus Service Bulletin (SB) A350-35-P013
- (3) B/E Aerospace SB E75000-35-001

#### SUMMARY:

Reference (1) proposed AD was prompted by certain passenger oxygen mask assemblies found to have sticking effects observed after exposure to high ground survival temperatures of 85 degrees centigrade and above. Investigation shows that this phenomenon is limited to masks using a specific manufacturing lot of breathing bag raw material. This condition, if not detected and corrected, could prevent the breathing bag to fully inflate, possibly resulting in injury to cabin occupants following a depressurization event. To address this potential unsafe condition, Airbus published the SB, providing instructions for identification and modification of the affected parts. For the reasons described above, this AD requires modification of the affected parts. This AD also prohibits reinstallation of affected parts.

#### DELTA'S COMMENTS

- A. Delta requests EASA PAD section “Affected Part” is revised as follows: Affected part: **Certain oxygen containers equipped with E75000-00 series oxygen masks**, having a Part Number (P/N) and Amendment (AMDT) as listed in Table 1 of this AD; and a serial number (s/n) as listed in Table 2 of this AD.

This request clarifies the affected parts that are listed in Table 1 as these parts are passenger oxygen containers and communicates to operators more specific affected part information including the P/N series of the affected oxygen masks. Additionally, removing the term “passenger” removes the notion that the affected parts are only oxygen containers located at passenger seats. Some affected mask containers could be installed at door areas or in lavatories.

- B. Delta requests EASA PAD section “Groups” is revised as follows: Groups: Group 1 aeroplanes are those that have an affected part installed **as specified in Airbus Service Bulletin (SB) A350-35-P013** (Ref. B). Group 2 aeroplanes are those that do not have an affected part installed. This request clarifies the applicability of the aircraft that have the affected parts installed. Delta received concurrence from Airbus that affected parts are not installed on Delta A350 MSNs and confirmed the service bulletin is not applicable to Delta A350 MSNs. Delta A350 MSNs are not listed in Airbus SB A350-35-P013.



C. Delta requests EASA PAD section “Modification, Table 1, Note 1:” is revised as follows: Note 1: **X and XXXXXXX** in Table 1 of this AD is a variable number, indicating the number of masks, and/or the mask code. N/A in Table 1 of this AD means No AMDT. XXXX in Table 2 of this AD is a variable number, from 0000 to 9999. This request clarifies that the 2nd digit in the affected part number is also a variable number.

***EASA response:***

***A. Comment agreed. The definition of affected part has been rewritten.***

***B. Same as response to Comment 1 B;***

***C. Comment agreed. Final AD has been updated accordingly.***

