

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-208

[Published on 28 November 2019 and officially closed for comments on 26 December 2019]

Commenter 1: United Airlines – Neil Sorensen – 10/12/2019

Comment # 1

In Definitions section, there is a minor typo in the Modification SB: Airbus SB 320-53-1281 should read SB A320-53-1281.

EASA response:

Comment agreed. Final AD has been pdated accordingly

Commenter 2: British Airways – Tom Eldridge & Mark Vicarage – 19/12/2019

Comment # 2

BAW would like to raise a concern with the use of generic task number used within the inspection SB, 53-1287, at revision 01.

Airbus has introduced a new method of “generic” task number referencing with their introduction of S1000D.

In the subject inspection SB, the generic task states, for example, “If no chafing marks are found: <1> Do Ref. Task A320-A-53-XX-1287-01ZZZ-740Z-A.” However, such a task number does not exist in the SB. The tasks that do exist are Task A320-A-53-XX-1287-01001-740A-A (Conf 1) & Task A320-A-53-XX-1287-01002-740A-A (Conf 2).

BAW has queried this with Airbus and have been directed to ISI 00.00.00161 (which is only applicable to A350), which details this method of task numbering and explains how the Z’s used in the initial reference are generic and should be replaced (by the Part 145 correctly choosing the task to match the config of the aircraft in work).

BAW notes that the A320 ISI detailing SB task numbering is 00.00.00136, which does not provide any such detail, and informs operators that tasks will be numbered “321346-831-801-001”, for instance.

BAW has concerns around operators/ maintainers correctly complying to the SB/ AD, without associated guidance material relative to the subject A/C type being correctly published. This is since a lack of understanding may lead to the Part 145 applying the incorrect task or certifying to a generic reference rather than the actual task reference. This may introduce complications for operators in proving compliance to the regulator.

For this reason, BAW politely request that EASA provides guidance on how operators should show compliance with such SB task numbering, or that the AD defines the specific tasks to be carried out, in order for the operator to be able to prove compliance.

EASA response:

Comment noted: This comment has been shared with Airbus, for further evaluation and consideration. Additional information are also available in Airbus OIT 999-0048/15 rev 04.

As a general rule, the method to show compliance with AD requirements should be agreed with the NAA, which is responsible for AD enforcement.

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

