

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-209

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

Commenter 1: United Airlines – Neil Sorensen – 19/12/2019

Comment # 1

Please make Note 2 (below Additional Work Paragraph (8)) applicable for aircraft repaired after the effective date of the AD as well. In accordance with SB A320-53-1269 R02, the tables, work instructions, and flow charts all state that if successful repair is accomplished within limits per RI R53370233 flowchart 3, you have within 15,000 FC to accomplish the frame replacement per RI R53370232.

We would like to see a similar PAD “Note 2” applied under the Corrective Action(s) section Paragraph (2) for repairs accomplished after the effective date of the AD. Otherwise, it will be confusing whether or not frame section replacement per R53370232 is mandated before further flight, regardless of successful repair per R53370233 flowchart 3.

EASA response:

Comment noted: in the PAD, Note 2 is a generic note, which applicability is not limited to paragraph (8). To be also noted that after the effective date of the AD, repair, as applicable, must be accomplished iaw the instructions of SB A320-53-1269R02, which – as noted – already includes the abovementioned requirement and compliance time.

In any case, final AD has been updated for clarification.

Commenter 2: Air France – Benjamin Pouyet – 20/12/2019

Comment # 2

EASA PAD 19-209 do not mention OIT 13-0035 which has been published on December 2013, and which permit operators to get the information of wrong coldworking starting diameter. Therefore, this PAD, especially paragraph (8), do not take into account operators, as Air France, which have modified entire fleet with correct coldworking procedure (SB 53-1270 R00 –OR- SB 53-1270 R01 + OIT 13-0035 –OR- SB 53-1270 R02).



At SB 53-1269 & 53-1270 initial issue, AFR decision was to directly perform the modification in order to avoid repetitive inspections (moreover, rototest also included in modification SB).

Today our fleet modification status regarding OIT 13-0035 is based on the job cards revision indexes at completion.

- Job card at initial issue = SB 53-1270 Rev00 instructions (correct C/W 6-1-N values)
- Job card at rev001 = SB 53-1270 Rev01 instruction + OIT 13-0035 rectification (correct C/W 6-1-N values)

SB 53-1270 rev01 + OIT 13-0035 have been both taken into account in our job cards from revision 001.

Therefore, AFR can safely assume that correct coldworking 6-1-N procedure have been applied on our aeroplanes, as the wrong coldworking starting diameter value has never been written in our job cards.

AFR modified aircraft are not supposed to be subjected to SB 53-1270 rev02 additional works, and future EASA AD para. (8).

EASA response:

Comment agreed. A credit provision has been added in the Final AD.

Commenter 3: Lufthansa Technik AG – Stefan Hermes – 20/12/2019

Comment # 3

A. For par. (5):

A Note is missing that modification iaw. SB A320-53-1270 is the termination action of inspection SB A320-53-1269.

B. For par. (8):

Grace period for the performance of the additional work is missing.

C. The Note 2 should be integrated in par. (7).

EASA response:

3A) Comment not agreed. A terminating action is required for repetitive inspections.

3B) Comment not agreed. Additional work must be accomplished with the compliance time as identified in Table 1.

3C) Comment not agreed. Note 2 deals only with RI R533-70233, flowchart 3, while paragraph 7 deals with RI R533-70233, flowchart 1 and 2.



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

Commenter 4: British Airways – Adrian Hewes – 20/12/2019

Comment # 4

BAW would like to raise a concern with regards to the compliance period for this AD.

BAW would request that EASA / Airbus review the compliance period for this AD, with a view to enabling operators to align the task to the most suitable maintenance environment.

The compliance time for ALS Part 2 new tasks or interval reductions is typically 2 years, which generally enables BAW to align them to Heavy Maintenance inputs.

EASA response:

Comment not agreed: available data does not support a generic compliance time of 2 years. Limited temporary exemptions can be managed by NAA, under the provision of Article 71 of the Regulation (EU) 2018/1139 (basic regulation). No changes have been made to the Final AD in response to this comment.

Commenter 5: Cathay Pacific – Kenneth Escalona – 13/12/2019

Comment # 5

On page 3 of 4 under Credit item 5, kindly provide a clarification called in this statement if should be read as Rev.01 instead of Rev.02. We believe it should read as Rev.01 as this was also the same for item 4 (inspection instructions).

5) Modification of an affected area on an aeroplane, accomplished before the effective date of this AD in accordance with the instructions of SB A320-53-1270 at original issue or **Rev. 02**, is acceptable to comply with the requirement of paragraphs (1) and (3) of this AD for that aeroplane for that affected area

EASA response:



Comment not agreed: the AD requires inspection iaw SB A320-25-1269 R02 and, if no cracks are detected, modification iaw SB A320-25-1270 R02. With paragraph (5) credit is given to inspection and modification accomplished iaw SB A320-25-1270 only, at original issue or Rev 02. For an area modified iaw SB A320-25-1270 R01, additional work is required. No changes have been made to the Final AD in response to this comment.

