

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-042

[Published on 26 February 2020 and officially closed for comments on 25 March 2020]

Commenter 1: United Airlines – Neil Sorensen – 18/03/2020

Comment # 1

For aircraft with previous repairs related to ALI 532166 and/or ALI 533186, accomplishment of the new Inspection SB A320-53-1383 and Modification SB A320-53-1268 or A320-53-1372 will not be possible on the applicable repaired hole(s). These inspection and modification SB's assume the aircraft is not in a repaired condition. For previous repairs related to these ALI's, Airbus has issued RDAS statements that the repair impacts the applicable ALI task. For example, repaired holes would be inspected in accordance with RDAS inspection program. And non-damaged holes would continue to be inspected in accordance with the applicable ALI task.

We kindly request guidance on previous repaired holes. We would like a paragraph stating to perform the inspection SB only on undamaged holes, and continue inspecting repaired holes in accordance with the RDAS. Additionally, we'd like a paragraph stating that the modification SB on undamaged holes constitutes terminating action for those undamaged holes.

Prior EASA AD's provided this guidance on their related ALI task. Refer to EASA AD 2016-0139 Para (7) and (8), and EASA AD 2016-0238 Para (7) and (8) for examples of previous repairs related to the applicable ALI task.

EASA response:

Comment agreed. Paragraph (6), (7) and (9) were added to the final AD in response to that comment.

Please note the statement provided in the Service Bulletins from Airbus:

The procedure as described in this Service Bulletin is to be performed if no AIRBUS repair and/or repair improvement has been previously performed in the same area. In case of repairs performed previously, please contact AIRBUS Repair Support department for further instructions.

Commenter 2: Cathay Pacific Airways – Hyphen Choi – 25/03/2020
Comment # 2

We are operating A320 and A321, based on the compliance requirements of SB A320-53-1383 Rev 00, we have the following understanding.

Aeroplane status - Having already accomplished ALI task 533186 and having not accomplished ALI task 532166:

It is not applicable to A321

Aeroplane status - Having already accomplished ALI task 532166 and having not accomplished ALI task 533186:

It is not applicable to A320 nor A321

We consider PAD 20-042 Table 1 for A320/A321 should read as follows:

Aeroplane Status	Aeroplanes concerned	Compliance Time
Not inspected in accordance with ALI task 532166 or ALI task 533186	A320 & A321	Before exceeding 40 000 FC or 80 000 FH, whichever occurs first since aeroplane first flight
<u>Having</u> already accomplished ALI task 532166 and ALI task 533186	A320 & A321	Within 15 000 FC or 30 000 FH, whichever occurs first after last ALI task 532166 or task 533186 inspection, whichever was accomplished first
<u>Having</u> already accomplished ALI task 533186 and <u>having not</u> accomplished ALI task 532166	A320	Within 15 000 FC or 30 000 FH, whichever occurs first after last ALI task 533186 inspection, without exceeding 44 500 FC since aeroplane first flight
	A321 is not applicable per SB 53-1383	Within 15 000 FC or 30 000 FH, whichever occurs first after last ALI task 533186 inspection, without exceeding 48 000 FC since aeroplane first flight



<p><u>Having</u> already accomplished ALI task 532166 and <u>having not</u> accomplished ALI task 533186</p>	<p>A320 & A321 are not applicable per SB 53-1383</p>	<p>Within 15 000 FC or 30 000 FH, whichever occurs first after last ALI task 532166 inspection, without exceeding 40 000 FC or 80 000 FH, whichever occurs first from aeroplane first flight</p>	
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Please confirm, if our understanding is correct.

EASA response:

Comment not agreed, ALI 532166 was applicable to A319 and A320 only. ALI 5331-6 was applicable to A318, A319, A320 and A321. Further to latest analysis, it has been identified that inspection through ALI 532166 should be applied on A321 as well.

The purpose of the SB 53-1383 is to cancel and supersede ALI tasks 532166 and 533186 with mandatory threshold and to introduce a recommended threshold. No changes have made to the AD further to this comment.

However due to the fact that published ALI 532166 was only applicable to A319 and A320 the AD Table 1 has been updated to limit only to those aeroplanes as concerned when that ALI is accomplished.

