

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-058

[Published on 26 March 2020 and officially closed for comments on 23 April 2020]

Commenter 1: Delta Air Lines – Cecilia Teeuwen – 21/04/2020

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 20-058, dated 26 MAR 2020

(B) Airbus Service Bulletin (SB) A350-53-P057

Upon reviewing the Ref (A) applicability, DAL requests that the applicability statement be made to reflect the specific effectivity of the SB. As written, Ref. (A) requires accomplishment of the NDT, inspection, and replacement of the fasteners on ALL A350 based upon mod status aircraft regardless of the manufacturer serial number (MSN). Ref. (B) explicitly establishes the applicability of specific aircraft MSNs and even describes which MSN aircraft will have the modification embodied in production (MSN 0307 and subsequent). Despite the explicit MSN applicability in Ref. (B), the applicability wording in Ref. (A) will require operators the unnecessary burden of reviewing records and updating of associated paperwork to ensure and prove that the proper mod status is embodied on all MSNs, including upon any future deliveries of A350 aircraft. For these reasons, DAL requests that the applicability of the upcoming AD be reflective of the specific Ref (B) effectivity. The applicability of the AD would be better defined if the applicability statement read one of the following two ways:

“Airbus A350-941 and A350-1041 aeroplanes, all manufacturer serial numbers (MSN) as identified in the SB.”

Or

“Airbus A350-941 aeroplanes, all manufacturer serial numbers (MSN) prior to MSN 0307.”

EASA response: Comment disagreed

The applicability of Airbus SB A350-53-P057 is based on the presence/absence of Airbus mod 114295.

The applicability of EASA PAD No. 20-058 is in line with the EASA AD writing policy and is considered appropriate.

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

