

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-062

[Published on 08 April 2020 and officially closed for comments on 06 May 2020]

### Commenter 1: Cathay Pacific Airways – Jimmy Cheng – 17/04/2020

#### Comment # 1

In accordance to SB-A350-55-P013, for the terminating action, it is acceptable to perform a combination of both the repair per SB-A350-55-P013 and modification per SB-A350-55-P012. However, although Paragraph 3 and 4 have mentioned about both scenarios for terminating the inspection, it does not provide a statement to authorize the combination of both actions. Please can the AD reflect a simple statement for this? Thanks.

**EASA response: Comment not agreed.**

***It is not possible to have a combination of repairs and modifications. MOD SB A350-55-P012 provides instructions to install retainers on all 4 bushings. It is not possible to embody partially MOD SB A350-55-P012.***

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

### Commenter 2: Delta Air Lines – Dallas Elzey – 23/04/2020

#### Comment # 2

##### Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 20-062, dated 08-Apr-20
- (B) Airbus Service Bulletin (SB) A350-55-P012, dated 18-Feb-20
- (C) Airbus Service Bulletin (SB) A350-55-P013, dated 18-Feb-20



**SUMMARY:**

EASA PAD 20-062 discusses bushing migration in HTP Lateral Fittings, leading to corrosion and fatigue. To address this potential unsafe condition, Airbus published Ref (C) to perform repetitive inspections, and Ref (B) to define terminating action. Ref (A) has been issued which will require accomplishment of Ref (C) to address this potential unsafe condition and allows Ref (C) as terminating action.

**DELTA'S COMMENTS**

Paragraph (3) of the EASA PAD states that repair per Ref (C.) of bushings found migrated constitutes terminating action for that airplane. Delta understands that the repair defined in Ref (C.) is a tighter fit bushing installation which prevents bushing migration. Delta believes that location specific language is needed for Paragraph (C.). There are 2 bushings at each location and 4 locations per A/C. Service Bulletin A350-55-P013 defines repairs per Repair Drawings R55V80078 and R55V80083. Delta does not see a requirement in the service bulletins or Repair Drawings to replace both bushings in a joint if only 1 is found migrated. And paragraph (3) of the EASA PAD states that the repair constitutes terminating action for the airplane. So if only 1 bushing is found migrated and only that 1 bushing was replaced, the literal wording of paragraph (3) might lead an operator to conclude that the repair/replacement of that one bushing terminates the entire aircraft (meaning all 8 bushings are now terminated). Delta recommends wording that is location specific and reflects that each joint has 2 bushings. For example: "Repair of both bushings in a joint with instructions in Inspection SB constitutes terminating action for that one HTP lateral Fitting location for this airplane. Repair of all 8 bushings with instructions in Inspection SB constitutes terminating action for this airplane".

Paragraph (4) of the EASA PAD states that modification per A350-55-P012 constitutes terminating action for this airplane. If no bushing migration is found, then that is correct. However, it is likely that some aircraft will be found with migrated bushings in 1 or 2 locations, so it is likely that some A/C will receive a combination of repairs and modifications. Delta recommends the addition of language to address this combination situation, such as "In order to terminate an aircraft, each HTP lateral fitting location must receive either the terminating action mod per A350-55-P012 or a repair of both bushings in the joint per A350-55-P013."



Paragraph (5) addresses reporting. With such a low rate of findings, reporting on each A/C is burdensome. Delta recommends that paragraph (5) be deleted. If some reporting is still required, Delta recommends reporting only positive findings and that negative findings not be required to be reported.

**EASA response:**

- A. *“There are 2 bushings at each location and 4 locations per A/C. Service Bulletin A350-55-P013 defines repairs per Repair Drawings R55V80078 and R55V80083. Delta does not see a requirement in the service bulletins or Repair Drawings to replace both bushings in a joint if only 1 is found migrated.”*

**EASA response:** Comment not agreed.

*Only the damaged bushing can be reworked, the other one on the same side or joint must be inspected by inspection SB A350-55-P013 or apply the modification SB A350-55-P012 on both A/C sides at all 4 locations as a terminating action.*

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

- B. *“And paragraph (3) of the EASA PAD states that the repair constitutes terminating action for the airplane. So if only 1 bushings is found migrated and only that 1 bushing was replaced, the literal wording of paragraph (3) might lead an operator to conclude that the repair/replacement of that one bushing terminates the entire aircraft (meaning all 8 bushings are now terminated).”*

**EASA response:** Comment not agreed.

*Paragraph (3) of the AD is: “repair of all affected parts on an aeroplane in accordance with the instructions of the inspection SB, constitutes terminating action for the repetitive inspections”.*

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

- C. *“Delta recommends wording that is location specific and reflects that each joint has 2 bushings. For example: “Repair of both bushings in a joint with instructions in Inspection SB constitutes terminating action for that one HTP lateral Fitting location for this airplane. Repair of all 8 bushings with instructions in Inspection SB constitutes terminating action for this airplane.”*

**EASA response:** Comment agreed.

*Please notice that by aeroplane there are 4 bushings and not 8 in total.*

*Final AD has been updated accordingly.*

*“(4) In case of bush migration identified during any DET as required by paragraph (1) of this AD, repair of all affected parts on one side of the aeroplane (RH or LH) in accordance with the instructions of the inspection SB, constitutes terminating action for the repetitive inspections as required by paragraph (1) of this AD for that one HTP lateral fitting location for that aeroplane.”*



**D. “However, it is likely that some aircraft will be found with migrated bushings in 1 or 2 locations, so it is likely that some A/C will receive a combination of repairs and modifications. Delta recommends the addition of language to address this combination situation, such as “In order to terminate an aircraft, each HTP lateral fitting location must receive either the terminating action mod per A350-55-P012 or a repair of both bushings in the joint per A350-55-P013.””**

**EASA response: Same as the response to Comment 1.**

**E. “Paragraph (5) addresses reporting. With such a low rate of findings, reporting on each A/C is burdensome. Delta recommends that paragraph (5) be deleted. If some reporting is still required, Delta recommends reporting only positive findings and that negative findings not be required to be reported.”**

**EASA response: Comment agreed.**

**Final AD has been updated accordingly to require reporting only in case of findings and “no findings” is not be required to be reported.**

