

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-066

[Published on 24 April 2020 and officially closed for comments on 22 May 2020]

### Commenter 1: Delta Air Lines – Dallas Elzey – 20/05/2020

#### Comment # 1

##### Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 20-066, dated 24 April 2020
- (B) Airbus Service Bulletin (SB) A320-25-1BFN Revision 01 dated 12 September 2019
- (C) Airbus Service Bulletin (SB) A320-25-1BPV Revision 01 dated 27 June 2019

##### SUMMARY:

Ref (A) is issued due to occurrences that were reported of missing OHSC X-fixation brackets, or wrongly installed on the Airbus final assembly line. This condition, if not detected and corrected, could lead to OHSC failure under certain loading conditions, possibly resulting in injury to passengers.

To address this potential unsafe condition, Airbus issued the applicable inspection SB Ref (B), applicable to certain Delta aircraft, providing instructions for inspection of the affected parts. For the reasons described above, this AD requires a one-time detailed inspection (DET) of the affected parts and, depending on findings, accomplishment of applicable corrective action(s) including accomplishment of Ref (C) modification as an acceptable alternative method to comply with the requirements of paragraphs (1) and (2) of this AD

##### DELTA'S COMMENTS

A. Ref (A) briefly describes the unsafe condition, however Delta review of Ref (B) found this SB to not be labeled as Potential AD and is not mandatory, but “recommended” by Airbus. Because of this, Delta requests that more information be provided in the AD Reason to improve the background and explanation of the unsafe condition. This especially considering the proposed AD Compliance time of 12 months which is significantly less than the Ref (B) recommended compliance time of 18 months.

B. As previously mentioned, Airbus SB Ref (B) compliance is recommended within 18 months. Ref (B) SB has not been evaluated as mandatory, potential AD, or otherwise communicated by Airbus to be related to a safety concern. A typical A321 hangar check visit is every 24 months. Per Airbus, the actual fallout rate of the inspection remains unknown, although the fallout is expected to be low. The quantity of replacement parts required will be critical to accomplishing the corrective actions. The current proposed compliance time of 12 months would require aircraft to be accomplished



outside of routine check interval which would lead to more pressure on getting replacement parts in a timely manner due to the “before further flight” stipulation in Ref (A) Required Action (2). Delta requests AD Compliance time be increased to 24 months to allow inspections and modifications to be completed during routine hangar check visits. Aligning the inspections and modifications to routine hangar check schedule will allow operators to complete the inspections and modifications without disruption to customers.

C. Ref (B) SB does not include “Required for Compliance” (RC) notation typical of an Airbus service bulletin evaluated as “Potential AD”. However, there is a step that includes a NOTE that reads: To send the Inspection Report sheet is not Required for Compliance (RC). to ensure operators are clear on what steps are required for compliance, Delta requests the proposed AD is revised to include what Steps or sections of the Ref (B) SB are Required for compliance and/or explicitly note in the proposed AD that sending the Inspection Report in Ref (B) SB is not required for compliance.

D. Ref (A) Proposed AD includes action to complete DET – or detailed inspection. Ref (B) includes action to complete SDI – or special detailed inspection. Delta requests clarification that the definition of “DET” in the proposed AD matches that as specified in Ref (B) SB with reference to the Visual Procedures included in A321 NTM 51-90-00.

**EASA response:**

**1A) Comment noted. EASA consider that the issue (missing/wrongly installed parts) and possible unsafe condition (injury to passengers) is adequately described in the Reason. Additional information (required e.g. to support an AMOC request) may be requested from Airbus. No changes have been made to the Final AD in response to this comment.**

**1B) Comment not agreed. Available data does not support an extension of the compliance time. No changes have been made to the Final AD in response to this comment.**

**1C) Comment not agreed. The AD requires to accomplish an inspection and, depending on findings, corrective actions. Per EASA standard, actions which are not required must not be listed in the AD; when reporting is required, it must be clearly stated in the AD, and a compliance time has to be specified. To be noted that Airbus SB A320-25-1BFN Revision 01 has a Note clarifying that reporting is not Required for Compliance (RC). No changes have been made to the Final AD in response to this comment.**

**1D) Comment agreed. Final AD has been amended accordingly.**

