

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-078

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Commenter 1: HNA Aviation Technic Company Limited – 何根 Again He – 28/05/2020

Comment # 1

We reviewed the PAD 20-078, in definition, ELAC 103 CG envelope is defined as follow:

****QUOTE****

ELAC 103 CG envelope: Centre of gravity (CG) envelope defined by any Airbus AFM Documentary Units (DU) having mod 163923 identified in the DU Criteria (see Figure 1 - Appendix 1 of this AD), and embodied as instructed by Airbus Service Bulletin (SB) A320-27-1284 revision 1.

****UNQUOTE****

In this definition, Centre of gravity (CG) envelope defined by any Airbus AFM Documentary Units (DU) having embodied as instructed by Airbus Service Bulletin (SB) A320-27-1284 revision 1 is ELAC 103 CG envelope.

But what if we have accomplished A320-27-1284 revision 0, is it necessary to rework A320-27-1284 revision 1 ?

If not ,we would like EASA to clarify this situation in AD.

EASA response:

Comment noted. The original issue of Airbus SB A320-27-1284 does not provide instructions/reference to amend the AFM. Even if there is no additional work identified in SB A320-27-1284R1, that revision SB clarifies how to amend the AFM after embodiment of the ELAC 103.

If an operator accomplished the original issue of the SB, without updating the AFM with the AFM DU related to mod 163923, the AFM TR (as defined in the AD) must be kept in the AFM.

If an operator accomplished the original issue of the SB, and also updated the AFM with the AFM DU related to mod 163923, the AFM TR (as defined in the AD) can be removed.

Definition of ELAC 103 CG envelope has been amended in th Final AD.