

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-081

[Published on 15 May 2020 and officially closed for comments on 31 May 2020]

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

Comment # 1

SB A350-53-P061 Compliance paragraph defines initial inspection within 4 months of the AD effective date. Per the SB, two inspections might need to occur within 4 months of the AD, specifically location of the seat studs to determine if they are in the loaded or unloaded area, and potentially the inspection of the affected seat tracks if the seat studs are in the loaded area. Per the Service Bulletin, if the first inspection finds that the seat stud is not in the loaded area then the inspection of the seat track can be deferred until 6 years from delivery.

EASA PAD 20-081 uses different language which may lead to confusion. The EASA PAD calls for inspection of the affected seat tracks within 2 months of the AD effective date if the seat stud is in the loaded area, or within 6 years if the seat stud is not in the loaded area. The EASA AD does not spell out the compliance limit for the inspection to determine if the seat stud is located in the loaded or unloaded area. Delta recommends that EASA spell out the time limit associated with determining if the seat stud is in the loaded or unloaded region.

Delta also notices that whereas the Service Bulletin uses a 4 month compliance limit for the inspections if the stud is in the loaded area, the EASA PAD proposes a 2 month compliance limit for the same inspection. No reason is given for the difference. When limits are different there is a potential for confusion. Delta recommends that EASA use the same 4 month limit defined in the Service Bulletin.

EASA response: EASA disagrees.

- 1. EASA believes that there is no need to mandate an inspection to determine if the seat stud is located in the loaded or unloaded area, as without doing this check it will not be possible to determine which compliance time in table 1 of the AD applies.**
- 2. The AD is the mandated document, and so the compliance times given in table 1 of the AD apply over those in the SB.**

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



Commenter 2: Cathay Pacific – Jimmy Cheng – 29/05/2020**Comment # 2**

1. For the Compliance time for Seat Stud in loaded area, CPA believe 2 months is insufficient to perform the necessary inspection without disrupting operation, therefore CPA would like to request for a slight extension to the compliance time to 4 months after the effective date of the AD.
2. For aircrafts accomplished inspection per TA 80724294/002/2019, in accordance to SB A350-53-P061, partial compliance can be credited, therefore CPA would like to request such statement to be included as an AD paragraph.

EASA response: EASA disagrees.

1. *EASA would not agree in any extension for the inspection of the loaded areas, as the compliance time is calculated on risk.*
2. *TA references are mentioned in SB 53-P061: "Inspections performed in accordance with the above TA, will be considered as a means of partial compliance of SB A350–53-P061". There is no need to add any AD text.*

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

