

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-088

[Published on 28 May 2020 and officially closed for comments on 25 June 2020]

### Commenter 1: Deutsche Lufthansa AG – Andreas Ott – 09/06/2020

#### Comment # 1

DLH has reviewed the provided PAD 20-088 that, once published, will supersede EASA AD 2014-0177. From our point of view the provided PAD with its requirements is acceptable.

But we are missing a credit paragraph stating that every action that has been performed before effective date of new EAD is acceptable to comply with requirements of the new EAD. It would be appreciated, if an additional paragraph similar to paragraph 2 of EAD 2014-0177 would be added to the new EAD before the EAD was released.

Example paragraph 2 of EAD 2014-0177:

- (2) Modification of an aeroplane, before the effective date of this AD, in accordance with the instructions of Airbus SB A320-53-1266 at original issue, is acceptable to comply with the requirements of paragraph (1) of this AD for that aeroplane, except as specified in paragraph (3) of this AD.

#### EASA response:

**Comment noted: the definition of “the SB” and of “the modification SB” does not specify a minimum revision of the referenced Airbus SB. It means that any revision of those SB is acceptable for compliance with the requirements of the AD. Actions accomplished before the effective date of the AD are acceptable for compliance under the clause “Required as indicated, unless already accomplished” in the “Required Action(s) and Compliance Time(s)” section of the AD.**

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



**Commenter 2: United Airlines – Neil Sorensen – 16/06/2020****Comment # 2**

SB A320-53-1266 and Modification SB A320-53-1363 require commercial agreements between Airbus and the operator to include MSN effectivity in these SBs. So far, a small fraction of MSNs have been included in these SBs as some operators plan to operate aircraft beyond the ESG structural modification point. As a result, the MSN effectivity in the current SB revisions do not match the complete Applicability of the AD. To help prevent non-compliance due to AD/SB effectivity discrepancy, we request the final AD contain a remark or instruction to contact Airbus Upgrade Services before the compliance time to add SB MSN effectivity. Doing so will bring awareness to the unique administrative requirements prior to accomplishing these modifications.

**EASA response:****Comment not agreed: per EASA ADs policy :**

- ***Only requirements related to the potential unsafe condition shall be part of the required actions.***
- ***In case of discrepancy between AD applicability and SB effectivity, AD applicability prevails.***

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

