

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-128R1

[Published on 07 October 2021 and officially closed for comments on 04 November 2021]

Commenter 1: Qatar Airways – Zaenab Eisa Mahmoud – 11/10/2021

Comment # 1

Reference to the subject PAD, please note that the following discrepancy was observed:

- Galley 3B P/N 601879-000301 is reflected in Table 4 – Affected Galley 4.
- Galley 3B P/N 601879-000301 should be removed from Table 4 – Affected Galley 4 and included into Table 3 – Affected Galley 3.

EASA response:

Comment not agreed. Affected galleys 3 are typically also listed in Table 1 or 2, as applicable, as post-mod P/N, which is not the case for the above mentioned P/N. To be noted that, in any case, the actions required on Affected Galley 3 and 4 must be made in accordance with the same group of Service Bulletins (SB2, as defined in the AD). However, to avoid any misunderstanding, the definition of affected galley has been clarified in the Final AD.

Commenter 2: American Airlines – Pat Kelley – 02/11/2021

Comment # 2A

Ref A. EASA PAD 20-128R1 Issued 07 Oct 2021

Ref B Airbus SB 25-1BK9 Rev 02 May 28/20

Ref C SAFRAN SB 601800-25-008 Rev C 23 Apr 2020



Ref D SAFRAN Product Specification NAS1836 Insert, Molded In, Blind Threaded, Self-Locking, Nonself-Locking, Lightweight, Sandwich Panel

SAFRAN SB
601800-25-008 REV CEASA PAD
20-128R1.pdfDwg 404233
NAS1836 Insert.pdfAIRBUS MSB
25-1BK9 REV 2.pdf

American Airlines has reviewed proposed revised PAD (Ref A.) to mandate incorporation of Airbus SB A320-25-1BK9 Rev 02 Dated May 28/20 (Ref B) (SAFRAN SB 601800-25-008 Rev C Dated 23 Apr 2020 (Ref C.)).

Modification of Ice Drawer Compartment, Replacement of End Stops for Standard Containers and Waste Bins.

Two Hundred and Twenty One American Airlines A319 and A321's are affected by this proposed Revised PAD (Ref A.). SB 601800-25-008 Rev C Dated 23 Apr 2020 (Ref C) Task NO. 601800-25-008-10 for Galley G5 Compartment O&P Step D. Drill Holes Diameter 11.7 MM DEEP 9.1 MM (3 PL).

SB Task NO. 601800-25-008-10 Step D. instructions; drill 11.7 MM diameter holes at a depth of 9.1 MM in 3 places. Step D. is not In Accordance With Ref D. SAFRAN Specification NAS1836 to install the Molded-In Inserts P/N NAS1836-06-11 (3 PL) in subsequent Step F.

There is no tool available to cut exactly 11.7 MM, and American Airlines would be unable to work around this step without an FAA Alternate Means of Compliance.

American Airlines would like to request EASA that in order to comply with SB 601800-25-008 Rev C Dated 23 Apr 2020 (Ref C) Task NO 601800-25-008-10 Step D, accomplish In Accordance With Ref D. SAFRAN Specification NAS1836.

Comment # 2B

Additionally, Ref A. EASA PAD 20-128R1 Dated 07 Oct 2021 Appendix 1 Tables 1, 2, 3, 4 and 5 do not correspond to Tables in Ref B. Airbus SB 25-1BK9 Rev 02 Dated May 28/20 Item E. List of Existing Parts Pages 32 thru 49 (NEW Part No. / OLD Part No.).

American Airlines would need the following change to be made in EASA PAD 20-128R1 Dated 07 Oct 2021 (Ref. A):

To prevent any confusion between Ref A EASA PAD 20-128R1 Appendix 1 Tables and Effective Aircraft MSNs and Galley NEW / OLD Part No as called out in applicable Airbus SBs 25-1BHG, 25-1BK9 Rev 02 and 25-1BKK; Appendix 1 Tables from (Ref A) EASA PAD 20-128R1 should be deleted.

EASA response:

Comment 2A: Comment noted. Comment forwarded to Airbus for possible update of the referenced SBs; any later revision of the SBs is acceptable for compliance with AD requirements. Meanwhile, it is confirmed that the tolerances as defined in NAS1836 spec are applicable for the installation of MOLDED-IN INSERTS P/N NAS1836-06-11 (3 PL). No changes have been made to the Final AD in response to this comment"

Comment 2B: Comment not agreed. The content of the (P)AD Appendix 1 Tables has been agreed and confirmed by Airbus and Safran. The referenced SBs will be updated at next scheduled revision, to be aligned with AD Appendix 1. No changes have been made to the Final AD in response to this comment.



Commenter 3: Deutsche Lufthansa AG – Daniel Hofmann – 04/11/2021**Comment # 4**

As described in the PAD the compliance time for the upcoming EAD will be identical with the compliance time of EAD 2019-0106 (within 48 months after 29 May 2019). Based on that and on the fact that currently there is no Airbus SB and no vendor SB for the mod on the galley 5 P/N that will be added to the existing List of EAD 2019-0106, we are not able to create a modification scenario for our 41 affected aircraft and also. After consulting Safran to get information about the release of the VSB we received the information that the VSB will be released together with the Airbus SB which they expect for January 2022. Our experience showed us that in this case we will receive the required material within 90 days. Based on that we will have about 12 to 14 month to modify 41 aircraft, without knowing yet how much work and downtime per aircraft this will cause. The consultation of other operators showed that is very likely that we will have to remove existing inserts and to install new ones. The drying time of the adhesive to be used based on the existing VSBs is about 7 days at room temperature. We do not have heating units that can be used in the aircraft to reduce the cure time of the adhesive.

Therefore we expect a time period for modification of 48 month for the galley 5 P/N added with the new EAD to create a reliable modification schedule without creating special layovers.

EASA response:

Comment not agreed – Available data does not support an extension of the compliance interval.

To be noted that an alternative adhesive (DP100FR), having a reduced curing time, is quoted in the Safran SBs, referenced in the Airbus SBs.

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

