

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-129

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Commenter 1: Delta Air Lines – Cecilia Teeuwen – 24/09/2020

Comment # 1

References:

- (1) EASA Proposed Airworthiness Directive (PAD): PAD No. 20-129
- (2) EASA Airworthiness Directive (AD): 2020-0067: ATA 05 – Time Limits / Maintenance Checks – Airworthiness Limitations Section (ALS) Part 3 – Certification Maintenance Requirements – Amendment
- (3) Airbus A318/A319/A320/A321 ALS Part 3 Revision 07, dated 11 October 2019
- (4) Airbus A318/A319/A320/A321 ALS Part 3 Revision 07 Issue 02, dated 17 January 2020
- (5) Airbus A318/A319/A320/A321 ALS Part 3 Variation 7.1 dated 10 June 2020
- (6) Airbus A318/A319/A320/A321 ALS Part 3 Variation 7.2 dated 31 July 2020

In paragraph (1) and paragraph (3) of the Reference (1) proposed A318/A319/A320/A321 AD specify “The Variation”, which is defined in the definitions paragraph as “Airbus A318/A319/A320/A321 Airworthiness Limitations Section (ALS) Part 3 Variation 7.1”, throughout each paragraph. Typically, EASA ADs related to ALS specify “the ALS”, which could be defined as “Airbus [Fleet] Airworthiness Limitations Section (ALS) Part [Part Number] Revision [Revision Number], including variation [Variation Number]”, as it identifies the revision level and variation level that is needed to be incorporated into the AMP. Since the Reference (1) proposed AD would only require Reference (5) variation, Reference (2) AD would be necessary to remain active as it requires Reference (3) and Reference (4) Revisions. Additionally, Reference (1) proposed AD Ref. Publications paragraph only provides approval for “The use of **later approved revisions** of this document is acceptable for compliance with the requirements of this AD” which can be interpreted as later revisions of Variation 7.1. Typically, EASA ADs related to ALS provide approval for “The use of **later approved variations or revisions** of this document is acceptable for compliance with the requirements of this AD”. Since Reference (2) AD has this statement and Reference (1) does not, an AMOC may be required for Reference (1) to incorporate Variation 7.2 or Revision 08.

A. In order to simplify the Reference (1) proposed AD, Delta recommends that EASA replaces “The Variation” with “The ALS” and define “The ALS” as “Airbus A318/A319/A320/A321 Airworthiness Limitations Section (ALS) Part 3 Revision 07, including variation 7.1”.



- B. Additionally, the statement in the Ref. Publications paragraph should be changed to “**later approved variations or revisions**”. If these changes are made, then Reference (1) proposed AD should supersede Reference (2) AD and allow a single AD to mandate ALS Part 3 for the A320 Family rather than two ADs. Delta understands that language would need to be added to keep the time of accomplishment requirements of Reference (2) AD current.
- C. Also, Delta would like to bring to EASA’s attention that Reference (6) Variation was published on 31 July 2020 and should be determined, if it is necessary to add to the definition of “the ALS” in order to prevent the need of another ALS Part 3 AD in the near future.

EASA response:

A. Comment not agreed. The AD requires only the actions as defined in the Airbus A318/A319/A320/A321 ALS Part 3 Variation 7.1. The ALS Part 3 at Revision 07 is referenced by EASA AD 2020-0067, which at this time is not superseded. When a new ALS Part 3 Revision will be issued that introduces new and/or more restrictive requirements, a new EASA AD will be issued, superseding EASA AD 2020-0067 and this AD, as well as any other AD that may have been issued by that time, addressing other ALS Part 3 variations. Until that time, EASA AD 2020-0067 and this new “ALS variation AD” will remain active.

Background: It was recently decided to manage ALS variations using the process as outlined above, particularly to avoid overlapping (or extended) compliance times for AMP updates. This also takes into account comments received from operators during previous ALS related PAD consultations.

B. Comment partially agreed. The “Ref. Publications” section of the AD lists only Variation 7.1 of Airbus A318/A319/A320/A321 ALS Part 3. Since an ALS Variation can be revised, the “later approved revisions” statement is correct. However, the Final AD has been amended to confirm that the use of revision later than 07 of the ALS Part 3 is acceptable for compliance.

C. Comment noted. The purpose of ALS Part 3 Variation 7.2 is to introduce a new specific limitation only applicable to certain aeroplanes upon installation of a specific optional change, therefore there is no need for AD action at this time.

No changes have been made to the Final AD in response to points A. and C. of this comment.

