

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-157

[Published on 16 October 2020 and officially closed for comments on 03 November 2020]

Commenter 1: American Airlines – Ben Niaki – 15/10/2020

Comment # 1

The definition of an “Affected part” in the subject PAD remains largely unchanged from EASA AD 2019-0093 i.e. once that affected part is inspected and repaired in accordance with the instructions of Liebherr SB 926C-27-01, it then becomes a “Serviceable part”.

However, whereas EASA AD 2019-0093 permitted the re-installation of a “Serviceable part”, the subject EASA PAD states that re-installation of an affected part is prohibited. This is understandable in the sense that an affected part cannot be removed from one aircraft and re-installed on another aircraft but the way the current PAD reads, it leads to the conclusion that an affected part cannot be re-installed even after the inspection and repair actions of Liebherr SB 926C-27-01 are carried out. AAL suggests that the final sentence in the PAD “Reason:” paragraph be expanded as follows:

This AD also prohibits (re)installation of an affected part on any aeroplane, unless it has been made into a serviceable part by complying with the instructions given in Liebherr SB 926C-27-01.

If the intention is to permanently remove affected parts from service, then AAL suggests the definition of an affected part be changed to not grant exception to SGRA’s that have passed inspection or have been repaired in accordance with Liebherr SB 926C-27-01.

AAL supports the proposed change in Applicability from certain manufacturer serial numbers (MSN) to all MSN’s since the parts in question do have ability to be moved from one aircraft to another aircraft.

EASA response:

Comment not agreed. The definition of an affected part excludes those which have passed (no defects found) an inspection, or have been repaired, as applicable, in accordance with the instructions of the Liebherr SB.

From that, it should be clear that a part which is in the list, but meets one of these conditions, is no longer an affected part but is a serviceable part, and therefore excluded from the installation prohibition.

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

Commenter 2: Cathay Pacific – Alfred Lee – 23/10/2020**Comment # 2**

Regarding to the PAD 20-157, understood that subject AD will be expended its applicability to include all MSN instead of specified MSN.

However, I believe the SB 27-3233's applicability is not affecting some of the operators including CPA that's why the SB is not accessible for CPA, and therefore CPA cannot perform the AD assessment to identify the affected S/N in the Airbus SB.

Understood that affected S/N can also be found in the VSB but PAD stipulate using airbus SB to identify the affected part instead of VSB. Hence, operator must need the Airbus SB in order to demonstrate compliance of the upcoming AD unless wording in the AD will be changed accordingly or SB applicability gets revised to align with AD's applicability so that CPA can get access to the SB.

EASA response:

Comment partially agreed. The Final AD has been amended by adding reference to the Liebherr SB for the identification of affected parts.

