

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-177

[Published on 06 November 2020 and officially closed for comments on 04 December 2020]

Commenter 1: Lufthansa Technik – Thorsten Koch – 18/11/2020

Comment # 1

- A. Note 1 is somewhat confusing; we propose to delete the note and instead to amend paragraphs (1), and (3), and (5.1) to begin with “For Group 1 and Group 3 aeroplanes:...”. This should be done simply because a note is just a note, while the paragraphs of the AD is titled “Required Action(s) and Compliance Time(s)”, hence all requirements for compliance should be mentioned in the AD paragraphs.
- B. We propose to amend paragraph (4) to add a note that an installation of POST MOD seals on all affected cargo doors using AMM/IPC (i.e. not based on modification SBs) is an acceptable means of compliance with the paragraph (4).
- C. We propose to amend the group 3 definition: There may be A319 aircraft which are fulfilling the definitions of group 3 (MOD and/or SB configuration), but which are not operating under ETOPS 120 (or more). We propose to add a sentence like “Group 3 aircraft, for which the approved Operator Maintenance Programme or the Operator Certificate exclude ETOPS operations, may be considered as Group 1.”
- D. A topic we have already discussed with Airbus: Even the latest AMM-Revision (01-NOV-2020) still includes the unchanged TASK 12-31-52-660-001-A “Cold Weather Maintenance – Doors”, which numerous operators may have adopted in their maintenance programme based on service experience. This task permits application of either Silicone base Grease-Mechanisms and Seals - - (Material Ref. 03JCA9) or Mineral Oil base Grease-- Vaseline or Petrolatum - (Material Ref. 03FAB1) to the cargo door seals. As Airbus has highlighted in the information related to this issue, Silicone base Grease is not acceptable for compliance with the requirements of TA 80774334/003/2020, and consequently also not for compliance with AD 2020-0133. There is a pertinent risk during winter that compliant material (Vaseline) applied with TA 80774334/003/2020 will be inadvertently removed and replaced by non-compliant Silicone base Grease. This may happen unnoticed, and therefore impose a risk for flight safety. We recommend to amend paragraph (1) as follows:

Cleaning and Greasing:

(1) For Group 1 and Group 3 aeroplanes:

(1.1) Within 6 months after the aeroplane date of manufacture, or within 3 months after 24 June 2020 [the effective date of EASA AD 2020-0133], whichever occurs later, and, thereafter, at intervals not exceeding 6months, clean and grease each affected part in accordance with the instructions of the TA.



(1.2) From the effective date of this AD, the use of Silicone base Grease (Material Ref. Airbus CML 03JCA9) is prohibited during servicing in accordance with AMM 12-31-52 of the forward, aft and bulk cargo door seals.

- E. In various occasions the need to re-identify Removable Structural Components (RSC) has been discussed in depth with EASA and Airbus. The associated Mod SBs do also not contain a Part number change of the affected cargo doors, which creates significant difficulties in controlling AD compliance at component level. As per IPC and AMM, doors with PRE MOD seals seem to be eligible for installation on a modified aircraft. While we notice that the PAD prohibits this (chapter Parts Installation), it is difficult to control at aircraft maintenance level, since mechanics and certifying staff have no immediate access to AD requirements and have to rely on OEM maintenance data (IPC, AMM). In any discussion regarding the topic, operators have highlighted that the proposed solution of an "SB embodiment placard" is insufficient to control AD compliance. It is recommended that EASA requires Airbus to revise the SBs at the soonest opportunity introducing POST MOD door partnumbers. We accept that this may require more time on Airbus side. It is recommended that EASA already adds a note to the PAD stating that a PNR re-numbering will have to occur at a later stage, introducing additional work to be done on aircraft (including superseding AD).

EASA response:

- A. Comment not agreed. By definition, a Group 3 a/c is a subgroup of Group 1 a/c. The note is just a reminder that, as such, all Group 1 requirements are also applicable. As properly observed, "a note is a note", used only to provide a clarification to/reminder of an existing requirement.**
- B. Comment not agreed. EASA does not support using IPC/AMM alone to change a/c configuration, even more when that action constitutes the corrective action to a possible unsafe condition.**
- C. Comment not agreed: EASA consider that Group definition is properly identified by reference to a/c configuration, rather than to its operational use (which may change depending on different operators). EASA does not consider a burden a limitation on ETOPS ops (or similar) for those operator which are not approved for ETOPS operations.**
- D. Comment noted. EASA consider that such information should be provided with the TA. The TA issue 3 already has a note giving credit to AMM task 12-31-52 only if the pure mineral Vaseline, Mineral Oil base Grease - Vaseline or Petrolatum - (Material Ref. 03FAB1) is used on cargo doors seals. The Final AD has been amended to require using TA issue 3, including credit for actions done i.a.w. previous TA revisions. In general, EASA consider that operators need to have a system in place to reassure their aircraft remain compliant with AD requirements, including review of existing maintenance procedures.**
- E. Comment partially agreed. Door re-identification is eventually an Airbus decision. EASA supports the introduction of a new P/N, but cannot impose it. If and when a new P/N will be defined, the AD will probably be revised to add reference to that P/N. The AD wording (already having the prohibition to re-install doors with an affected part) has been chosen to manage this change by an AD revision, rather than a new AD, limiting the administrative burden for operators.**

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



Commenter 2: Lufthansa Technik – Thorsten Koch – 01/12/2020

Comment # 2

AMM Task 10-10-00-550-801-A (Parking and Storage Procedure), SUBTASK 10-10-00-640-052-A "K. Protection of the Doors" instructs application of Dry lubricant-Anti Seizing PTFE Loaded - (Material Ref. CML 03QDB1) on the seals of all the doors for Aircraft Parking more than 1 Month and for Storage.

A typical product within Airbus CML 03QDB1 is Klingerflon Spray. The Technical Data Sheet and Usage Instructions for this product explicitly require removal of any oil or grease from the surface to be treated. In other words; mechanics applying the PTFE spray may have a tendency to remove the Vaseline, and to apply the PTFE instead. Since the return to service procedure does not include a requirement to re-apply the vaseline, there is a relevant risk that the aircraft will return to service non-AD-compliant unnoticed, if the AD did not become due during Parking/Storage.

This risk is potentiated by the fact that also the periodic ground checks include re-application of PTFE spray to the seals,

- Ref. AMM 10-12-00-553-802-A Storage Periodic Ground Checks, SUBTASK 10-12-00-210-096 at 3 MTH interval
- Ref. AMM 10-11-00-555-804-A Parking Periodic Ground Checks, SUBTASK 10-11-00-210-079 at 3 MTH interval.

In the current pandemic situation, this may occur on quite a number of aircraft.

We recommend to change this in the Parking/Storage procedures to the effect that PTFE is not to be applied on cargo door seals if any grease is already applied on those. The grease will most likely fulfill the same purpose as the PTFE for parking/storage, while it fulfils the AD requirement (which the PTFE does not).

Please note also that the AMM Parking and Storage procedures refer to AMM 12-31-52-660-001-A for parking/storing the aircraft in cold weather! Therefore, while not too many operators may have a scheduled maintenance service experience task for the Winter Ops to grease i.a.w. AMM 12-31-52-660-001-A, the large portion of the world fleet currently parked in this pandemic winter may receive the AMM 12-31-52-660-001-A task, which still allows silicone-based grease!

(While this is anyhow in conflict with the above mentioned PTFE application)

We therefore recommend a further amendment to paragraph (1) to add (1.3):

Cleaning and Greasing:

(1) For Group 1 and Group 3 aeroplanes:



(1.1) Within 6 months after the aeroplane date of manufacture, or within 3 months after 24 June 2020 [the effective date of EASA AD 2020-0133], whichever occurs later, and, thereafter, at intervals not exceeding 6 months, clean and grease each affected part in accordance with the instructions of the TA.

(1.2) From the effective date of this AD, the use of Silicone base Grease (Material Ref. Airbus CML 03JCA9) is prohibited during servicing in accordance with AMM 12-31-52 of the forward, aft and bulk cargo door seals.

(1.3) From the effective date of this AD, the use of Dry lubricant-Anti Seizing PTFE Loaded - (Material Ref. CML 03QDB1) is prohibited during servicing in accordance with AMM 10-10-00, AMM 10-11-00, and AMM 10-12-00 of the forward, aft and bulk cargo door seals, unless cleaning and greasing of these seals as required by paragraph (1.1) is accomplished at return to service after parking or storage.

EASA response:

Comment not agreed. See also EASA answer to comment 1D.

Commenter 3: Deutsche Lufthansa – Andreas Ott – 02/12/2020

Comment # 3

- A. DLH propose to update the group 3 definition, to cover A319 aircraft which are fulfilling the definitions of group 3 (MOD and/or SB configuration), but which are not be operated under ETOPS 120 condition. For those aircraft we propose to update the Group 3 definition and add the information that those aircraft should be considered as Group 1, if the Operator Certificate or approved Operator Maintenance Program exclude ETOPS operation.
- B. We are not happy with note 1. Instead of note 1 we would prefer to begin the paragraphs 1, 3, and 5.1 with “For Group 1 and Group 3 aeroplanes”. With these changes all for compliance required detailed information were mentioned in the EAD paragraphs and not in a note.
- C. Related to paragraph 1 of the PAD we already discussed the situation with Airbus several times and no changes have been added with the last two AMM revisions. According AMM-Task 12-31-52-660-001- A Cold Weather Maintenance Doors from NOV 2020 it is still allowed to use Silicon based Oil Grease (CML Ref 03JCA) or Mineral based Oil Grease (CML Ref 03FAB1) for the lubrication of cargo door seals. This is not in line with the existing requirement of EAD 2020-0133 and as well as not in line with the requirement of PAD 20-0177. According Airbus published information the application of Silicon based Oil Grease is not acceptable to comply with the named requirements. As this task has been added from operators to their maintenance program as service experience there is a high risk that during winter operation the by EAD required Mineral based Oil Grease will be removed and Silicon based Oil grease will be applied to the cargo door seals without any notice. Furthermore it has been found out that during parking and storage procedure AMM Task 10-10-00-550-801-A, SUBTASK 10-10-00-640-052-A protection of doors advices application of Dry



lubricant Anti Seizing PTFE Loaded (CML REF 03QDB1) on door seals for Aircraft Parking more than 1 Month and for Storage. This will also be done during parking and storage periodic ground checks according SUBTASK 10-12-00-210-096 and SUBTASK 10-11-00-210-079 at an interval of 3 month. As all these tasks are not in line with the EAD requirements DLH propose to split paragraph 1 and add a paragraph 1.2 that prohibits the usage of Silicon based Oil Grease (CML Ref 03JCA) on cargo door seals as allowed according AMM 12-31-52 from the effective date of this EAD and a paragraph 1.3 that prohibits the usage of Dry lubricant Anti Seizing PTFE Loaded (CML REF 03QDB1) on cargo door seals unless cleaning and lubrication of these seals according PAD paragraph 1.1 will be performed after parking or storage.

- D. Related to paragraph 4 we propose to add the information, that installation of a post modification cargo door seals by using the AMM or IPC is sufficient to comply with the requirements of paragraph 4 and terminates the inspection requirements by paragraph 1. This can be done by note or by updating the whole paragraph 4 of the PAD.
- E. Related to paragraph 5 parts installation DLH has concerns that it will nearly impossible to prevent the installation of pre modified doors on aircraft as long as there is no part number change after modification. As our maintenance stuff does not have immediate access to EAD requirements they have to rely on manufacturer maintenance data like AMM and IPC. As long as the PN of a door will not be changed during modification and the AMM, IPC will not prohibit the installation these doors due to no PN change we do not see a chance for operators to control the installation and/or identification of wrongly installed pre mod doors. Therefore DLH will request that modification SB's for the cargo doors will be revised to add post modification PN. If this PAD will become an effective EAD in-between DLH propose to add a note to this PAD that informs all operators that new PN for post modification doors will be introduced with next revisions of door modification SB's. After that revisions are available another EAD will be published to mandate the PN change and therewith the accomplishment of revised SB's. For aircraft or doors that have already modified the PN change should be covered by separate additional work advised by modification SB's.

EASA response:

A. See EASA answers to Comment #1, points A and C.

B. See EASA answers to Comment #1, points A and C.

C. See EASA answers to Comment #1, point D, and Comment #2.

D. See EASA answer to Comment #1, point B.

E. See EASA answer to Comment #1, point E.

No changes have been made to the Final AD in response to points A, B, D and E of this comment.



Commenter 4: United Airlines – Ali Nowrouzi – 03/12/2020**Comment # 4**

- A. PAD 20-177, Affected Part: Add to forward and aft cargo compartment door seal, PMA Part Number D5237106020400S. FAA AD 2020-16-01 included forward and aft cargo door seals part number D5237106020400S, approved under PMA PQ1715CE. Please note in [FAA] AD 2020-16-01, the FAA has determined that part number approved under PMA PQ1715CE is also affected by the unsafe condition.
- B. PAD 20-177, Applicable SB: Airbus SB A320-52-1195, utilizes following consumables to attach identification placards to forward, aft and bulk cargo compartment doors. CML: 04SBA3 Varnish, CML: 08BAA9 Cleaner, CML: 13FBB2 Adhesive, CML: 14SBA1 Textile. We request EASA to allow Operators to use the above consumables or equivalent consumables. Please note having the option to use alternate/equivalent consumables for installation of the placard does not affect safety concerns addressed by the new AD.

EASA response:

- A. Comment not agreed. EASA is not State of Design for PMA parts. It is expected that the FAA, as State of Design for those PMA, will issue a new AD providing requirements for those PMA parts. Once that FAA AD is issued, EASA will consider adopting it.**
- B. Comment noted, and forwarded to Airbus for possible SB revision. See also the first Note in section 3 of the SB, clarifying the use of “refer to” and “in accordance with” within the SB.**

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

