

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-208

[Published on 22 December 2020 and officially closed for comments on 05 January 2021]

Commenter 1: Cathay Pacific Airways – Peggy Lin – 31/12/2020

Comment # 1

- 1) Can EASA include the definition of Emergency Opening of passenger doors in this PAD for better clarification?
- 2) Referring to the definition of Affected Part (DEOA with P/N FE396001001), can EASA advise if the aircraft record in operator's system can be used to support the identification of affected parts or a fleetwide physical inspection is a must?
- 3) As mentioned in this PAD, "this AD is considered an interim action and further AD action may follow". Can EASA advise if the further AD related to the Airbus SB A350-52-P049 (mandate the retrofit or replacement of DEOA)? Any timeline for releasing the further AD action and if EASA consider to put this as the terminating action of the subject AD?

EASA response:

- 1) **Comment agreed. Door emergency opening in the sense of the AD is "any door opening with the door in armed condition". Final AD has been updated accordingly.**
- 2) **A review of aeroplane delivery and/or maintenance records is acceptable to make this determination, provided those records can be relied upon for that purpose and the P/N of the DEOA can be positively identified from that review. No changes have been made to the Final AD in response to this comment.**
- 3) **Comment noted. The Airbus MSB A350-52-P049 will be rendered mandatory by an AD superseding this AD. No changes have been made to the Final AD in response to this comment.**



Commenter 2: Delta Air Lines – James Thompson – 05/01/2021**Comment # 2****Reference:**

(A) EASA Proposed Airworthiness Directive: PAD No. 20-208, dated 22-Dec-20

(B) Airbus Service Bulletin (SB) A350-52-P050, dated 15Dec-20

SUMMARY:

EASA PAD 20-208 discusses potential damage to Pax door guide arms if the doors are opened in emergency mode with certain door emergency opening actuators (DEO). To address this potential unsafe condition, Airbus published Ref (B) to perform inspections. Delta operates under the FAA, however the EASA ADs become the foundation of the FAA ADs, so we all benefit from EASA PAD review.

DELTA'S COMMENTS

(1) Terms “Guide Arm” and “Rod” are the same thing.

In the Service Bulletin REASON, on page 2, the SB refers to “rod rupture” and rods being replaced within 15 days if the door faces an emergency opening with certain actuators. In other paragraphs the SB refers to replacing the “guide arms” if the door was opened in emergency mode with certain actuators. Ideally the SB would have used consistent language that matches the IPD. In order to reduce confusion, Delta suggests that EASA add a statement that the “rod” and “guide arms” are the same thing in this SB and this EASA PAD/AD.

(2) SB and EASA PAD call for different actions for the same condition.

(2).(a). Ref B Service Bulletin calls for inspection of the DEOA part number if the door was opened in the emergency mode. If the DEOA is a certain MPN, only then does the Service Bulletin call for replacing the guide arm. If the DEOA is not that certain “bad” MPN, then no further action is required. See Ref B, page 62 as an example. However, EASA PAD paragraph (1) calls for replacing the guide arms directly if the door was opened in the emergency mode. The step about examining the DEOA MPN is missing from the EASA PAD. Delta believes that paragraph (1) of the EASA PAD should state: “For aeroplanes on which an emergency opening of an affected door has been performed before the effective date of this AD: Within 4 months after the effective date of this AD, inspect the DEOA MPN and replace forward and aft guide arms on that affected door if required in accordance with the instructions of the SB.”

(2).(b). Ref B Service Bulletin calls for rod replacement within 15 days if the door faces an emergency opening with certain actuators (see SB page 50 for example). Indicating that rod replacement is only required if certain DEOA actuators were at that door location. If the DEOA is not that certain “bad”



MPN, then no further action is required. However, EASA PAD paragraph (2) calls for replacing the guide arms within 15 days for all future door openings in the emergency mode. The step about examining the DEOA MPN is missing from the EASA PAD. Delta believes that paragraph (2) of the EASA PAD should state: “For aeroplanes on which an emergency opening of an affected door is performed after the effective date of this AD with actuator FE396001001: Within 15 days after the emergency opening of that affected door, replace forward and aft guide arms on that affected door in accordance with the instructions of the SB.”

(3) Difficulty in determining if door has been opened in emergency mode.

Compliance table (Ref B, pages 14 - 20) and work instructions (ref B page 50 for example) include a step to determine if the door was opened in emergency mode. For an operator, all maintenance tasks are recorded either on scheduled cards or on non-routine cards if unscheduled. Emergency opening of the Pax doors and resulting slide replacement would be on non-routine cards. Copies of all previous non-routine cards are filed in separate packages by visit date. Delta’s processes are similar to other operator’s processes. So in order to determine if the door has been opened in the emergency mode, literally hundreds of visit packages must be opened, and hundreds or thousands of individual non-routine cards must be reviewed for each tail. The SB offers no alternative to this daunting task. Delta recommends that paragraph (1) of the EASA PAD be revised to add “If emergency opening of the door can not be determined, then inspect the DEOA MPN and replace the forward and aft guide arms on all potentially affected doors if required in accordance with the instructions of the SB.”

(4) Retrofit SB not yet issued but instructions are in the SB

The REASON on page 2 of SB A350-52-P050 states that SB A350-52-P049 will be published to mandate the retrofit or replacement of DEOA PN FE396001001 to a more recent DEOA. As of the authoring of this comment letter, SB A350-52-P049 has not been released. However SB A350-52-P050 refers to retrofit or replacement. SB A350-52-P050 includes two notes on page 50, 51, 52, 53, 54, and 55. The first Note states: “NOTE: If a scheduled emergency opening test is planned, actuator PN FE396001001 has to be retrofitted with relevant Service Bulletin or replaced with DEOA PN FE396001003 or further PN before performing the test.” Delta questions the ability to perform an AD related task when the SB has not been issued yet. Delta recommends that the EASA PAD paragraph (1) add the following: “The first Note under Step C.(x).(y).1.a.<2> (where “x” means both 1 and 2, and where “y” means a thru h) in the work instructions and similar NOTE (1) in Compliance Table is not mandated at this time.”

(5) Clarification of language:

SB A350-52-P050 includes two notes on page 50, 51, 52, 53, 54, and 55. The second note states: “NOTE: If a door faces an emergency opening with actuator PN FE396001001, the rods have to be replaced within 15 days.” Paragraph (2) of the EASA PAD states that for future emergency door opening after the AD effective date. The EASA PAD language is clear. But the SB phrase “if the door faces an emergency opening” is confusing for unplanned and unscheduled actions such as emergency opening of the door. How would we know if a door was facing an unplanned event such as emergency door opening? Delta believes that both instructions are intending the same actions. Since the confusing phrase is included in SB A350-52-P050, which is soon to be AD mandated, it could be interpreted as mandatory and could result in AMOC requests. For the sake of clarification and reducing AMOC requests, Delta recommends that the EASA PAD paragraph (2) add the following: “This paragraph replaces and supersedes the requirements in the second Note under Step C.(x).(y).1.a.<2> (where “x” means both 1 and 2, and where “y” means a thru h) in the Work instructions and in NOTE (2) in Compliance



table.”

EASA response:

- (1) Comment noted. The terms guide arm and guide rod are the same. Airbus will consider a harmonisation of the terms at the opportunity of the next SB revision. No changes have been made to the Final AD in response to this comment.**
- (2) Comment partially agreed. The aim of the Service Bulletin is to replace both guide arms (forward and aft) if an emergency opening of the door has been performed with DEOA Part Number (PN) FE396001001 (see Objective section of the SB p. 2). Both conditions have to be fulfilled: Emergency opening accomplished with an affected DEOA.**

The step about examining the DEOA Part Number is not missing from the EASA PAD. This is part of the affected part definition: “Affected part: Passenger door damper emergency opening actuators (DEOA), having Part Number FE396001001.”

The DAL comment is true if the term "affected door" is not equal to the term "affected part (DEOA)" e.g. in case the Ratier VSB FE396-52-01 has been accomplished already at one point in the past before the emergency opening took place. To clarify this situation AD has been updated by removing the definition of ‘affected door’, and the wording in the “Required Action(s) and Compliance Time(s)” section of the AD has been amended accordingly.
- (3) Comment not agreed. From EASA point of view it is not difficult to determine if door has been opened in emergency mode. Such records should be available e.g. from the scheduled slide/raft sample tests and corresponding spare parts ordering. No changes have been made to the Final AD in response to this comment.**
- (4) Comment noted. The Airbus MSB A350-52-P049 will be rendered mandatory by an AD superseding this AD. However it is expected that the superseding AD will still require the replacement of the guide rods if an emergency opening is conducted with an affected part installed. No changes have been made to the Final AD in response to this comment.**
- (5) Comment noted. The AD language is correct. Airbus will consider the DAL comment at the opportunity of the next SB revision. No changes have been made to the Final AD in response to this comment.**

