

COMMENT RESPONSE DOCUMENT

EASA PAD No. 20-209

[Published on 23 December 2020 and officially closed for comments on 20 January 2021]

Commenter 1: British Airways – Tom Offord – 04/01/2021

Comment # 1

AOT A27P016-20 uses the AOT effective date in order to specify the compliance time. PAD 20-209 specifies that the compliance time is related to the AD effectivity date. Will the effectivity date of the AD be backdated to match the AOT effectivity date or will the AOT effectivity date be referred to in the AD?

It should also be noted that revision 1 of the AOT changed the effectivity date from 01 DEC 20 to 01 JAN 21.

EASA response:

Comment noted, but not agreed. As per standard process, the Final AD becomes effective 14 days after its publication date.

Commenter 2: LATAM AIRLINES GROUP – Luis Gutiérrez – 05/01/2021

Comment # 2

In accordance with PAD 20-209, paragraph (7), it is allowed to install an affected part on any aeroplane, provided that, following installation, it is inspected as required by paragraph (2) and, the repetitive health checks as required by paragraph (4) for that aeroplane are accomplished.

1st Case Scenario:

Our doubt is that in case of unscheduled replacement of an affected part by another affected part, after having accomplished paragraph (2) on a given aeroplane, is it required to perform the health check IAW the thresholds provided in Table 1 or at 850FC (as mentioned in AOT A27P016-20 after PCU replacement)?

We foresee that if it is IAW Table 1, the initial 6Mo of threshold will be already accomplished and then the health check must be performed before next flight after installation of an affected Slat PCU. On the other hand, IAW AOT A27P016-20 R01, after replacement of Slat PCU the threshold to perform the health check is 850FC.

Considering this scenario, what would be the correct threshold to perform the following Health Check in this case?

2nd Case Scenario:

In case of replacement of Slat PCU as consequence of applicable corrective action of the health check, and due to the high number of aeroplanes parked or in storage, the unit to be installed is removed from an aeroplane in storage. Similar to the 1st case scenario, which will be the threshold to perform the following health check? Our concern is to install a Slat PCU (removed from another aeroplane), which has not been inspected and to allow it to be installed in another aeroplane for additional 850FC, as mentioned in the AOT.

Could you please clarify to us the paragraph (7) of this PAD, in order to control and set correctly the threshold to perform the health check after replacement of an affected part?

EASA response:

Comment agreed. The health check threshold set at 850 FC is only valid for a Slat PCU that contains a new TSU. The installation of an affected part requires confirmation of compliance with paragraphs (2) and (4) of the AD for that part.

Paragraph (7) updated as follows “For Group 1 and Group 2 aeroplanes: From the effective date of this AD, it is allowed to install on any aeroplane an affected part, provided that, before next flight after installation, it passes an inspection as required by paragraph (2) of this AD and, thereafter, repetitive health checks are accomplished as required by paragraph (4) of this AD for that affected part.”

Commenter 3: Eastern Airlines Technic Co.,Ltd – Yan Zhang – 08/01/2021

Comment # 3

We have some questions about the PAD_20-209 for the PCU TSU Health Check Thresholds:

Question 1: For the PCU swapping. For example, Aircraft A, installed PCU1, need to repeat TSU health check within 150FC. Aircraft B, installed PCU2, need to repeat TSU health check within 350FC. If for some other purpose, we swap PCU1 with PCU2. Ref to the PAD logic, PCU1(installed on Aircraft B now) need repeat TSU health check within 350FC, and it is a security hole because actually the health check threshold for PCU1 has been extended.

Question 2: For the new PCU installation, how do we count the threshold? For example, Aircraft A, installed PCU1, then found leakage and replace a new PCU. Should we consider it less than 500FC? And within 6 months or 350 FC, whichever occurs first after accumulates 500 FC?



Thus, we suggest that whichever PCU installation or PCU swapping, it is necessary to take health check right away.

EASA response:

Comment agreed. See answer to Comment #2 above. For a new PCU installation, the Form 1 accompanying the part will clarify if and when the initial TSU health check was accomplished to show compliance with paragraph (2), and calculation of the paragraph (4) Repetitive Health Check interval.

Commenter 4: Deutsche Lufthansa AG – Jan Hoffmann – 08/01/2021

Comment # 4

In our opinion the compliance time section “Less than 500FC” in this PAD is formulated awkwardly.

“Within 6 months or 350FC, whichever occurs first after the aeroplane accumulates 500FC since Airbus date of manufacture “

350FC after reaching 500FC is not a problem for our system, it’s just 850FC. But to implement 6MTH after reaching 500FC is not possible with our system. We cannot implement a time limit to start when a FC limit is reached. Therefore we recommend to remove this time limit.

The new limit should be:

Flight Cycles (FC) Accumulated	Compliance Time
500FC or more	Within 6 months or 350 FC, whichever occurs first after the effective date of this AD
Less than 500FC	Before the aeroplane accumulates 850 FC since Airbus date of manufacture

This would also match the repetitive requirements. After replacement of the PCU, the health check has to be repeated **after 850FC without any time limitation.**

EASA response:

Comment not agreed. The proposal of the commenter is contrary to the initial intent of a 6-months’ time limit, in particular for “less than 500FC” aircraft that are in long-term storage.



Commenter 5: Singapore Airlines Limited – Abel Li – 13/01/2021**Comment # 5**

On behalf of Singapore Airlines (SIA), we'd like to provide some comments for PAD 20-209 related to the A350 Slat PCU Torque Sensing Units (TSU) health check.

Referring to Airbus AOT A27P016-20 and EASA PAD 20-209, Operators (including SIA) face potential challenges in meeting the timelines listed in the AOT and PAD due to the following reasons:

- a. SIA operates a large fleet of A350s and many aircraft have accumulated over 500FCs. SIA foresees a potential bottleneck as only one test tool is provided by the OEM (Liebherr) to support a fleet of over 50 aircraft once operations ramp-up in 2021. This bottleneck will be exacerbated further if many aircraft are to be re-inspected at the shorter 150FC interval.
- b. Per Liebherr VSB 4785A-27-06, the test tool has to be calibrated every year. When each calibration validity expires, Operators (like SIA) will be required to send the test tool for re-calibration and will not be able to perform the health check, resulting in operational disruptions and potential task overruns.

SIA would like to request EASA consider the above arguments to determine a suitable compliance time in the final AD.

EASA response:

Comment noted. Although acknowledging the constraining situation in the field, Airbus has provided and will provide full support to its customers to ensure operators will be able to comply with the AD requirements.

Commenter 6: Cathay Pacific – Alfred Lee – 18/01/2021**Comment # 6**

Regarding to PAD 20-209, please see below feedback from CPA:

Quote from PAD's Affected Part and Groups definition:

"Affected part: Slat power control units (PCU), having Part Number (P/N) 4785A0000-04 or P/N 4785A0000-05.

Groups: Group 1 aeroplanes are those that have an affected part installed. Group 2 aeroplanes are those that do not have an affected part installed."



Quote form PAD para (5):

“(5) Replacing each affected part on an aeroplane with PCU which is not an affected part, constitutes terminating actions for the repetitive health checks as required by paragraph (4) of this AD for that aeroplane, provided that replacement is accomplished in accordance with instructions issued by Airbus and that, following that replacement, no affected parts are re-installed on that aeroplane.”

Per existing A350 IPC, I believe all A350 are only able to equip 4785A0000-04 or P/N 4785A0000-05 that mean all A350 are group 1 a/c according to PAD, and the new designed PCU is not available yet. The terminating action mentioned in the PAD does not exist yet. It is recommended that the terminating action Para to be removed from the AD or AD issuance after terminating action or new PCU P/N get available.

EASA response:

Comment acknowledged. The intent of paragraph (5) is associated with the Group 2 definition, i.e. for future aircraft delivered that have embodied the final fix/new SPCU -06 installed. The “Terminating Action” paragraph anticipates that new SPCU -06, that will be certified and become available for retrofit. This is the background for the sentence in the Reason section of the AD that “This AD is still considered an interim action and further AD action may follow”.

Commenter 7: Lufthansa Technik AG – Jens Wiedau – 20/01/2021

Comment # 7

LHT kindly request to the change the Compliance Limit for A/C accumulated “Less than 500 FC” listed in Table 1.

LHT recommends to set the Compliance Limit for those A/C to 850 FC after first flight, because the current limit is almost impossible to set up in the tracking system without manual effort and the risk of human errors. As per LHT information get from Airbus neither a single case was reported nor expected below 850 FC and if a Slat PCU (containing new TSU’s) is replaced due to findings the TSU health check has to be performed within 850 FC after replacement as well. Consequently, as per LHT understanding there is no reasonable justification not to change the compliance limit as requested.

LHT kindly request to adopt the Terminating Action Paragraph (5) by adding the Terminating Action SB which is announced for it. This will allow the Operators in conjunction with Airbus to clearly adopt the relevant documentation (IPC) after the modification in order to avoid an affected P/N will be installed unintentionally.

EASA response:

Comment noted. See EASA answers to Comments #4 and #6 above.

