

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-005

[Published on 29 January 2021 and officially closed for comments on 26 February 2021]

### Commenter 1: Gulf Air – Engineering – Mohamad Al Charif – 31/01/2021

#### Comment # 1

Further to EASA PAD No.: 21-005, please note the following:

Background: Gulf Air has its fleet affected along with its future upcoming A320-253NX MSN 10169, 10256 and 10306. PAD is effective as per Appendix PN listed and as per SB 25-1BVT.

Concern: Our query is about inspections statement "Within 36 months since first installation of an affected part on an aeroplane".

Since this PAD and SB 25-BVT deals also with future production aircraft, and since date of galley installation on production aircraft is prior aircraft manufacturing and delivery date, and since this date is unknown to airline, we would appreciate if you can clarify this point or amend the statement to aircraft manufacturing date.

#### Additional comment:

Under reason the first word "Occurrences" has a typo error showing one r in place of double r, please correct the typo to read "Occurrences".

#### **EASA response:**

**Comment agreed. The Final AD has been amended accordingly.**

### Commenter 2: ZHEJIANG LOONG AIRLINES CO.,LTD.– Eric Tian – 01/02/2021

#### Comment # 2

According to the Corrective Action of PAD 21-005, SB A320-25-1BVS and SB A320-25-1BVT, the damage should be quick/intermediate repaired before next flight or limit the trolley weight. We think it is not practicable for airlines to do so.



1. Considering the curing period, it is too long to do the repair work for airlines before next flight, and will cause an unwanted AOG. It will be better to extend the requirement of corrective period.
2. For the means to limit trolley weight, it is not practicable to weigh the weight. If the trolley is empty, it also have a tare weight to incur an unsafe situation. Besides, limiting the trolley will also have a bad influence on the airline daily operation.
3. When putting the trolley into the galley compartment, we will brake the trolley, it could be secured tightly. If the galley failed, the trolley would not burst to skip out.
4. If during a repetitive inspection, we find the damage area expanded, there is no procedure for us to implement.

Based on the above reasons, we propose the Corrective Action should be optimized before issue an AD.

**EASA response:**

**Comment noted.**

- 1. It is recommended to plan the repairs according to the repair instructions including curing periods.**
- 2. It is confirmed that trolley carts have to be handled as referenced in SB/Inspection Guide (IG).**
- 3. Brakes of the trolley carts are not considered as an alternative means to retain the trolley inside the trolley compartment.**
- 4. Inspection/repair/limitations need to be performed as described in the SB, as applicable.**

**No changes have been made to the Final AD in response to these comments.**

**Commenter 3: easyJet Plc (EZY) – Alex Windsor – 03/02/2021**

**Comment # 3**

With reference to PAD 21-005 for the Galley Inspection in accordance with Airbus SB's A320-25-1BVS and 1BVT, EZY have the following questions:

- A. As per paragraph (2) Corrective Actions, if during any GVI as required by Paragraph (1), of this AD, discrepancies are detected on an affected part, before next flight, accomplish the applicable corrective action(s) in accordance with the instructions of the applicable SB. EZY would like to know how it will be possible to manage any repairs required before the next flight, because after discussions with Safran (the OEM), they have confirmed that if any discrepancies are identified during the GVI, EZY need to contact them for dedicated repair instructions in order to rectify the discrepancy and obtain the necessary materials (which will most likely have a lead time and will also need to account for the shipping time from the OEM to the MRO)?



- B. As per paragraph (3) Terminating Actions, there are currently nil terminating actions. EZY would prefer to perform the terminating actions to this PAD rather than the temporary repairs (quick-fix/ intermediate-fix) to reduce the operational impact of having the temporary repairs and repetitive inspections across the applicable aircraft. Can EASA please confirm when Terminating Actions will be available?
- C. Additionally, can EASA please confirm whether the Terminating Actions will result in the Galley Part Number changing post SB accomplishment?
- D. Airbus SB's A320-25-1BVS and 1BVT both refer to Safran (the OEM) Inspection Guide 601800-25-002, this Inspection Guide details some possible materials required for the temporary repairs, however EZY believe the AIB SB's should refer to Safran VSB's that are Galley Module Part Number Specific and contain the man hours and material requirements for each possible type of repair (Quick-Fix and Intermediate-Fix). This is the usual process to allow for clear and dedicated maintenance planning functions, which must be accomplished before the next flight. Can EASA please advise if OEM VSB's could be provided in place of the Inspection Guide?

**EASA response:**

- A. Comment not agreed. Depending on the finding either usage limitation or repair have to be applied. Regarding repair lead time for implementation, it is suggested to prepare kits and tools availability in advance of the inspection, as well as to plan compatible slots considering the curing periods.**
- B. Comment noted. As indicated in the AD, the current mandated actions are considered to be an interim action and further AD action may follow. A terminating action is under development and planned to be available within the course of 2022.**
- C. Comment noted. While EASA supports using a new P/N to ease identification between 'affected design' and 'modified design', EASA will stick to the Regulation for certifying the future design improvement.**
- D. Comment noted. All required logistic detail information to prepare a repair shall be coordinated with SAFRAN (the galley OEM), the Inspection Guide 601800-25-002 will be complemented within the next revision of the IG in the course of 2021. In case of particular questions, SAFRAN (the galley OEM) is to be contacted. No VSBs are foreseen since the repair is to restore the initial design.**

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

**Commenter 4: Cathay Pacific – Gary Chan – 11/02/2021**

**Comment # 4**

- A. "Affected part: Galleys, having a Part Number (P/N) as listed in Appendix 1 of this AD."  
Appendix 1 lists out galley P/N and the associated galley naming (i.e. Galley P/N 6019A3-XXXXXX is identified as galley G4x/SG4.)



An aft facing galley G3B having P/N 6019A3-000001 is installed on CPA aircraft, Airbus confirmed that this galley is not applicable for inspection per SB A320-25-1BVT. Airbus also advised only forward-facing galley G2a, G4x, SG4, G5, G8 having the P/N listed on Appendix is applicable to the SB inspection.

We would like to request EASA to amend the statement to "Affected part: forward-facing galley G2a, G4x, SG4, G5, G8 having a Part Number (P/N) as listed in Appendix 1 of this AD."

B. "Within 36 months since first installation of an affected part on an aeroplane, or within 12 months after the effective date of this AD..."

All affected CPA aircraft are newly delivered within the past 6 months, Airbus also advised galley first installation date can be from delivery date of the aircraft. We would like to request EASA to add note 'aircraft transfer of title date' can be used as galley first installation date for galleys line fitted by Airbus.

**EASA response:**

**A. Comment agreed, AD is updated accordingly.**

**B. Comment agreed. The Final AD has been amended accordingly.**

**Commenter 5: Safran Cabin CZ – Mark Heijnis – 16/02/2021**

**Comment # 5**

The Appendix 1 of the PAD 21-005 provides an overview of the affected parts in accordance to Note 1 of the AD. This overview contains at the bottom of the overview the AFT Complex.

There are two part numbers (P/N) reflected:

601537-XXXXXX

601539-XXXXXX

The only module delivered in the 601537-XXXXXX range is the 601537-1 for DAL STC. This particular module is approved by FAA under a STC. From our point of view, P/N 601537-XXXXXX should be excluded from this AD since the P/N is approved by FAA under an STC.

**EASA response:**

**Comment not agreed. Since that P/N is eligible for installation on Airbus aeroplanes, this AD regulates its installation and required actions for those aeroplanes. Actions different from those required by the AD may be managed using the AMOC process.**



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

*Partially related to this comment, paragraph (4) has been added in the Final AD.*

**Commenter 6: All NIPPON AIRWAYS CO.,LTD – Yukihiro Bunno – 16/02/2021**

**Comment # 6**

The PAD clarifies the aircraft applicability as follows.

Applicability: Airbus A318-111, , , , ==Partially omitted==, , , , A321-272N and A321-272NX aeroplanes, all manufacturer serial numbers.  
with the definition

Affected part: Galleys, having a Part Number (P/N) as listed in Appendix 1 of this AD.

On the other hand, the Airbus SB A320-25-1BVS and SB A320-25-1BVT now both in original issue clarify the applicability by specific aircraft MSNs with having specific galley P/Ns shown in Appendix Safran IG 601800-25-002.

Please confirm whether the aircraft applicability should be for all MSNs including future aircraft.

If not, please correct the aircraft applicability as shown in Airbus SB A320-25-1BVS and SB A320-25-1BVT or clarify with galley S/N (or manufacture date).

**EASA response:**

*Comment partially agreed. The effectivity of the SB is based on the a/c configuration at the time of delivery to the first customer. It cannot be excluded that the configuration of certain aeroplanes has been modified in service, in a way which is not known to Airbus. These post-delivery actions are not addressed in any SB.*

*Groups have been defined in the Final AD to clarify that the inspections must be accomplished only on a/c having an affected part installed, and to provide parts installation requirements.*

**Commenter 7: All NIPPON AIRWAYS CO.,LTD – Yukihiro Bunno – 24/02/2021**



**Comment # 7**

We have the following number of effective aircraft, as of now:

A321-211 4

A320-271N 11

A321-272N 17

For approximately half of those, about 3 years have past since the date of manufacture. The due date "Within 36 months since first installation of an affected part on an aeroplane, or within 12 months after the effective date of this AD, whichever occurs later" in PAD is too short. It should require the first inspection at NOT "C check" but "line maintenance" on many in-service aircraft. This should lead to the AOG condition for 2, 3 or more days in case of findings. It has a big impact on operators. (We know that there is the option to limit the cart load, but it is not a practical solution for airlines with respect to the impact for in-flight service). In addition, the repair method described as the Intermediate Fix seems too difficult and heavy solution for operators. Those seem to be able to be accomplished only by the galley manufacturer Safran.

We think this situation is similar for many other operators.

- A) Please extend the due date of the first inspection to at least "within 36 months after the effective date of this AD" so that we can do the inspection and also the corrective actions at "C check".
- B) If A. is not acceptable, please allow aircraft to return to service without corrective actions but with repetitive inspection until next C check. The reason is the same as shown in comment A.

**EASA response:**

**Comment not agreed. Available data does not support an extension of the compliance time, as proposed. See also EASA answer to Comment #3, Point A, above. To be noted that actions differing from those required by the AD may be managed using the AMOC process.**

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

**Commenter 8: Deutsche Lufthansa AG – Klaus Schlichtkrull – 24/02/2021****Comment # 8**

Based on the Safran Inspection Guide referenced in SB A320-25-1BVS and A320-25-1BVT, the inspection interval is every 6 months in case of no findings or the "Quick Fix Repair". In case the "Intermediate Fix Repair" has been done, there will be a threshold of 36 months until the next inspection. The "Intermediate Fix Repair" does not require the complete replacement of all retainer blocks of the trolley compartments and the stabbing profile and



the whole skin panel. It is only required to replace the delaminated area of the skin panel or to replace the corroded/cracked retainer block or the defect stabbing profile. Therefore we have the concern that there may occur heavy delamination of the skin panel and corrosion/cracks on the not replaced retainer blocks during the threshold period of 36 months after an “Intermediate Fix Repair”. A general inspection interval of 6 months is neither meaningful in terms of prevention nor possible for a handling of the operators. The “Intermediate Fix Repair” ends up in removing the galley monument to do the repair in a composite workshop, because the repair cannot be done on-wing. The efforts are more than 150 Mhs and about one week of aircraft downtime. For several operators, there are dozens of aircraft affected, which result in a significant operational impact, especially because of the critical situation during this crisis. Additionally there is no estimate for an end of the inspection and repair sequence possible, due to a not available terminating action.

Therefore we propose to do the repetitive-inspection with an general interval of 12 months as long as the “Intermediate Fix Repair” was not applied on all retainer blocks. A review of the finding rate should be done soon, to check the possibility to escalate the repetitive inspection after passing the first inspections, to lower the impact for the operators.

**EASA response:**

**Comment not agreed. See EASA answer to Comment #7 above. It should be noted that the AD requires repetitive inspections at intervals not to exceed 6 months, including repaired galleys.**

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

**Commenter 9: Eurowings Technik GmbH – Marlene Leutgeb – 25/02/2021**

**Comment # 9**

Eurowings would like to make use of the possibility to comment PAD 21-005. According to this PAD, the implementation of Airbus SB A320-25-1BVS or A320-25-1BVT is required. These Service Bulletins specify an inspection interval of 6 months for a visual inspection of the galley retainer blocks. If there are no findings, an interval of 6 months applies for further inspections. If a finding is made during this inspection, an intermediate fix repair is required to be carried out immediately for which a removal of the galley will be necessary. This will cause a man-hour effort of at least 150 MH which results in a downtime of the aircraft for several days. As a significant portion of the EW fleet are affected by this SB, this would lead to considerable operational disruptions. As there is no terminating action so far, an end of the inspection and repair work is not foreseeable.

To mitigate these operational impacts, we propose to extend the inspection interval to 12 months and to assess the finding rate to allow the possibility of further escalation of the interval in case of a low finding rate. Furthermore, a terminating action should be provided by Airbus or the galley manufacturer which should be considered in any future AD revision.



**EASA response:**

**Comment not agreed. See EASA answers to Comment #3 and #7.**

**Commenter 10: Delta Air Lines – Alexandra Kidd – 26/02/2021**

**Comment # 10**

Delta has reviewed Ref (1) PAD and Ref (2) Airbus SB A320-25-1BVS original issue has the following comments:

- A. Ref (1), Paragraph (1) for Required Action(s) and Compliance Time(s), mandates the accomplishment of GVI of each affected part in accordance with the instructions of the applicable SB Ref ` (2).

Ref (2), Paragraph (3)(C)(1)(a)(1)(a)( $\leq 3$ ) and Paragraph (3)(C)(1)(a)(1)(b)( $\leq 3$ ) and Paragraph (3)(C)(1)(a)(1)(c)( $\leq 3$ ) provide instructions to accomplish a “Quick Fix” repair.

Ref (2), Paragraph (3)(C)(1)(a)(1)(a)( $\leq 5$ ) and Paragraph (3)(C)(1)(a)(1)(b)( $\leq 5$ ) and Paragraph (3)(C)(1)(a)(1)(c)( $\leq 5$ ) provide instructions to accomplish a “Intermediate Fix” repair.

For the Quick Fix” repair and the “Intermediate Fix” repair, it was not detailed in Ref ` (2) if the post-repaired configuration cause a permanent reduction in the trolley weight allowed. This confirmation would communicate to the operator if any operation changes are required to accommodate a permanent trolley weight change.

Delta kindly requests that the EASA AD be released after the SB Ref (2) is revised. The SB Ref (2) to be revised to confirm if any permanent change to the trolley weight has occurred after the accomplishment of “Quick Fix” repair or “Intermediate Fix” Repair. If changes to the trolley weight after accomplishment of the repairs are required, the SB Ref ` (2) should include the new weight values. A technical request, containing these comments, is being prepared for submission to Airbus for their review.

- B. Ref (1), Paragraph (1) for Required Action(s) and Compliance Time(s), mandates the accomplishment of GVI of each affected part in accordance with the instructions of the applicable SB Ref (2). Ref (2) Appendix IG601800-25-002 Revision E dated 31-July-2020, Appendices, Section QUICK FIX (SKIN REATTACHMENT), Step (1) provides instruction to accomplish the procedure of adhesive application.

Step (1)(e) instructs to “Apply adhesive between skin and trolley retainer block or stabbing and as much as possible evenly distribute adhesive inside the affected area.” Note 1 of this Step requires to use a two-part epoxy adhesive (DP100FR) with a cure time of 24 hours at room temperature. This cure time would cause an operation constraint for the operator. Note 2 of this Step recommends an adhesive layer thickness of approximately 3 mm. Maintaining an evenly distributed adhesive layer of a specified dimension is difficult to comply with for the operator.





Ref (2) Appendix IG601800-25-002 Revision E dated 31-July-2020, Appendices, Section QUICK FIX (SKIN REATTACHMENT), Step (2) provides instruction to accomplish procedure of adhesive application injection.

Step (2)(b) between notes instructs to “Apply adhesive through-hole inside the gap until the adhesive will leak from it.” This Step has a Note that requires to use a two-part epoxy adhesive (DP100FR) with a cure time of 24 hours at room temperature. This cure time would cause an operation constraint for the operator.

Delta kindly requests that the AD be released after the SB Ref (2) is revised. The revision to the SB Ref (2) Appendix IG601800-25-002 Revision E dated 31-July-2020, Appendices, Section QUICK FIX (SKIN REATTACHMENT), Step (1)(e) notes to be revised to allow an alternative adhesive with a shorter cure time and allow a range of adhesive thickness acceptable for repair compliance. Ref (2) Appendix IG601800-25-002 Revision E dated 31-July-2020, Appendices, Section QUICK FIX (SKIN REATTACHMENT), Step (2)(b) note to be revised to allow an alternative adhesive with a shorter cure time. A technical request, containing these comments, is being prepared for submission to Airbus for their review.

- C. Ref (1), Paragraph (1) for Required Action(s) and Compliance Time(s), mandates the accomplishment of GVI of each affected part in accordance with the instructions of the applicable SB Ref (2). Ref (2) Appendix IG601800-25-002 Revision E dated 31-July-2020, Appendices, Section INTERMEDIATE FIX contains the steps to accomplish Skin Replacement Procedure, Trolley Retainer Block Replacement Procedure and Stabbing Assembly Replacement Procedure.

Step (24) instructs to “Apply and evenly spread a layer of adhesive upper panel skin where trolley retainer block will be installed.” Note 2 of this Step recommends an adhesive layer thickness of approximately 5 mm.

Step (25) instructs to “Apply and evenly spread a layer of adhesive on the upper and bottom of the trolley retainer block. Refer to Figure 23, Figure 25 and Figure 26.” Note 1 of this Step recommends an adhesive layer thickness of approximately 3 mm.

Step (43) instructs to “Bond the stabbing assembly + bracket corners into the panel using adhesive. Refer to Figure 44.” Note 2 of this Step recommends an adhesive layer thickness of approximately 3 mm.

Step (13) instructs to “Apply and evenly spread a layer of adhesive on the new panel skin and on the stabbing area where the new panel skin will be installed. Refer to Figure 48 and Figure 26.” Note 1 of this Step recommends an adhesive layer thickness of approximately 5 mm.

For each of the above-listed steps and corresponding notes, maintaining an evenly distributed adhesive layer of a specified dimension is difficult to comply with for the operator.

Delta kindly requests that the AD be released after the SB Ref (2) is revised. The revision to the SB Ref (2) Appendix IG601800-25-002 Revision E dated 31-July-2020, Appendices, Section INTERMEDIATE FIX, Step (24) Note 2 / Step (25) Note 1 / Step (43) Note 2 / Step (13) Note 1 to be revised to allow a range of adhesive thickness acceptable for repair compliance. A technical request, containing these comments, is being prepared for submission to Airbus for their review.

#### **EASA response:**



- A. Comment not agreed.. It should be noted that the repair (quick fix or intermediate fix) is quoted as an alternative to the limitation on trolley weight. For clarification, the SBs will be updated with a note that the trolley weight is not limited after a repair has been performed.**
- B. Comment not agreed. Should an improved corrective action become available in the future, it will be referenced in a later revision of the applicable SB, which can be used for compliance with the requirements of the AD.**
- C. Comment not agreed. See EASA answer to point B above. In general, assuming EASA correctly understands the rationale behind the commenter's request, from a safety point of view, it is preferred to start the inspection campaign with the available instructions, rather than delaying that, pending the development and approval of a new (improved instructions) repair.**

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

### **Commenter 11: American Airlines – Richard Pearson – 26/02/2021**

#### **Comment # 11**

##### References:

/A/ Airbus, SB A320-25-1BVS & A320-25-1BVT

/B/ SAFRAN Galleys Europe, VSB IG 601800-25-002 (Airbus embedded in /A/)

/C/ SAFRAN Galleys Europe Supplier 4050G

/D/ SAFRAN Galleys Europe, SL 601800-25-005 Rev A

/E/ Diehl CMM 25-43-51 (attached)

Introduction: AAL Engineering and Maintenance has reviewed the subject EASA PAD and ref /A/. AAL is familiar with the situation and would like to offer EASA critical insight based on our operational experience inspecting, evaluating and repairing the described damage.

Background: AAL owns and operates 360 each SAFRAN Europe galleys with a small handful of spares, constructed in a similar manner to the galleys described in ref /A/. We first observed damage to the bonded workdeck structure consistent with ref /B/ during the 1S check on our A321 AAL02 fleet. It should be noted that ref /C/ does not provide bonded component repairs or composite repairs in their CMM in any way adequate to evaluate and repair the damage we noted. We worked extensively with ref /C/ in our own local offices reporting damage, evaluating drawings, repairing and fabricating parts at our expense to address these issues and eventually leading to the issuance of a similar repair document for AAL, ref /D/. Note that the ref /D/ repair limits, methods and materials are similar to those described in ref /A/ and ref /B/.

Concerns: AA agrees that ref /B/ will adequately restore the bonded trolley block retainer assembly for damage consistent with the repair limits provided yet AAL has experienced damage on a routine basis that would exceed the limits expressed in ref /B/. We believe the inspection findings are



overly optimistic in that the size and scope of the repair patches necessary will not be consistent with ref /B/. We also believe the “quick fix” injection repair of a disbanded skin will not be likely. In general, whenever the scope of damage requires increased cutout limits, changes to the repair materials, etc. additional approvals will be routinely required and overwhelming to AAL, SAFRAN, Airbus, EASA and possibly the FAA. We believe this will be a likely scenario.

The sandwich panel common to the trolley blocks subject to ref /A/ are constructed from industry standard materials and methods (adhesive bonded aluminum blocks, aramid core, epoxy adhesive and fiberglass skin). Supplier ref /C/ has given no alternate repair materials that could be perfectly suited to restore the part during the repair given in ref /B/. For example, adhesives have a given worklife for a given temperature. As these are in-situ repairs, it may be impossible to lower (or raise) the ambient temperatures within the ranges necessary to apply the specific adhesives. Should AAL need to use alternate materials such as an alternate structural adhesives found to be suitable to the local environment, this would require additional approval. In our experience, supplier ref /C/ does not offer this sort of thoughtful flexibility.

We also consider the as-needed patchwork approach of adjacent trolley block repairs likely, meaning, as many as four or more trolley block assemblies may need to be removed and replaced on a galley due to damage. In our experience, doing so individually is impractical, overly invasive, and does not take into consideration details of the bonded structure such as potted inserts, cutouts for pivoting T-dividers, etc. Also note that adjacent structural elements such as the stabbing assembly, must be destroyed during trolley block removal. This has regularly been the case in our experience. We have found that applying heat to bonded parts in order to facilitate their removal is overly optimistic and can cause additional damage. Bonded sandwich panels such as those on our 360 SAFRAN SFE galleys are generally not designed for these sort of repairs. A bonded part replacement procedure must be elementary, given the specialized nature of performing composite repairs.

Lastly, in addition to hundreds of other operator’s aircraft, AAL has 163 A319 and A321 aircraft affected by ref /A/. The proposed schedule for inspection, “quick fix” repairs, part replacement, temporary removal of trolley carts (operators are unlikely to exercise this option) or AAL proposed workdeck section splicing is very aggressive. In our recent experience and under the current circumstance, supplier ref /C/ may not be capable of delivering parts, technical support and approvals satisfactorily. AAL asks Airbus, SAFRAN and EASA to consider this carefully.

Request: In lieu of taking a “localized inspect and repair as necessary approach” for each individual trolley block location, AAL is asking Airbus and SAFRAN, together with EASA, to consider a more comprehensive repair approach that would trim and replace a section of the entire work deck (e.g., forward 12” section of the work deck) that encompasses all of the trolley blocks. Airbus/SAFRAN could introduce a pre-fabricated composite and less-corrosive workdeck partial replacement section that could be easily spliced and bonded to the original work deck along a trim line. The rework undertaken by ref /A/ is written in-situ for a line maintenance environment and not a composite repair shop, yet AAL expects findings will frequently exceed the capabilities for line maintenance technicians.

Please note that under similar circumstances, Airbus and Diehl, with guidance from AAL successfully achieved a partial panel replacement method for the A320F lower lavatory wall/fitting (also due to corrosion) to comply with lavatory AD 2006-09-11 (see CMM ref /E/ for partial panel replacement/rework details). The lavatory partial wall replacement approach was very straightforward and eliminated all the variables associated with a localized “inspect and repair” approach. The partial panel replacement approach is very clean and repetitive for mechanics and eliminates much



confusion. Given our experience, AAL believes multiple trolley blocks will regularly require replacement to satisfy ref /A/ and the damage will be out of those limits causing delays with repair approvals, and ultimately drive us to a partial sandwich panel replacement.

**EASA response:**

**Comment noted. See EASA answers to Comment #10, points B and C above.**

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

**Commenter 12: Safran Cabin – Mark Heijnis – 02/03/2021**

**Comment # 12**

The Appendix 1 of the PAD 21-005 provides an overview of the affected parts in accordance to note 1 of the AD.

This overview is missing the following p/n:

Galley G6, p/n 601567-XXXXXX

**EASA response:**

**Comment agreed. Final AD has been updated to add that P/N.**

**Commenter 13: Scandinavian Airlines System – Mohamed Aslam – 05/03/2021**

**Comment # 13**

In reference to the subject of this email, the above PAD and Airbus SB (A320-25-1BVT), it seems to not have a sufficient enough solution to when a repair cannot be performed, as the only solution provided is to limit the cart weight, however, for an airline the engineering department has very little control over the weight limit in the trolley, as these carts are used to store food on-board and handled by a separate department (catering). This means that there isn't a sufficient enough method of transferring the weight limit (if there are any during the repetitive inspection to which a damage can't be repaired) information to the catering department, as the respective people are not P145 technicians.



Furthermore, this solution would also affect Flight Ops, as they would also need to be informed every time there is a weight limitation on any aircraft, which could potentially affect the seating capacity onboard due to the limited storage space in the galley to store the food for the passengers, whereby a possible worst case scenario would be that there isn't sufficient enough food onboard for all the passengers due to the limited galley storage.

Moving Forward, I would suggest that if any damages found, a sufficient enough compliance time limit should be provided to operators for damage that go un-repaired, to defer the defect until Safran can provide a repair, rather than having to fix the repair before the next flight, which may cause several AOG issues

***EASA response:***

***Comment not agreed. See EASA answers to comment #3***

***Commenter 14: [Removed]***

***Comment # 14***

The following P/N should be included in Appendix 1 of the AD

G2a 601957-XXXXXX

G2a 601897-XXXXXX

G4b 601958-XXXXXX

G4x/SG4 601883-XXXXXX

G4c 6018A4-XXXXXX

***EASA response:***

***Comment agreed. Final AD has been updated to add those P/N. It is confirmed that inspections can be accomplished in accordance with the instructions of the SB, and no additional consultation is deemed required.***

