

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-020

[Published on 11 February 2021 and officially closed for comments on 11 March 2021]

Commenter 1: Delta Air Lines – James Thompson – 01/03/2021

Comment # 1

References:

(A) EASA Proposed Airworthiness Directive: PAD No. 21-020, Dated 11FEB2021

(B) EASA AD 2017-0117, Dated 07JUL2017

(C) FAA AD 2018-09-09, Dated 20APR2018

(D) Airbus Service Bulletin (SB) A320-57-1208 Revision 00, Dated 21NOV2016

(E) Airbus Service Bulletin (SB) A320-57-1208 Revision 01, Dated 23SEP2019

DAL has reviewed REF (A) and has the following comments about the proposed rule:

1. The last two paragraphs of the REF (A) 'Reason' discuss, why the original REF (B) has been superseded. These paragraphs state:

"Since that AD was issued, Airbus issued the SB, as defined in this AD, including additional modification requirements and new specific configurations for the Commonwealth of Independent States (CIS) aeroplanes operation. For the reasons described above, this AD retains the requirements of EASA AD 2017-0117, which is superseded, introducing different compliance time for certain aeroplane configurations."

DAL recognizes that these paragraphs are included in the REF (A) 'Reason' to specify what actions took place that lead to the superseding of REF (B) and to also specify that while superseded, REF (B)'s requirements are retained. However, DAL feels that these paragraphs could be misleading/inaccurate for the following reasons – the paragraphs seem to indicate that there is minimal change between the newly proposed rule and the superseded REF (B). However, any work accomplished per REF (B) (via REF (D)) is not sufficient for compliance to the newly proposed rule and requires coordination with Airbus to maintain compliance with REF (A). Additionally, REF (A) introduces Groups 1 and 2 (and resulting new/revised compliance times), which has the potential to significantly impact when operators will be required to plan/accomplish the required work .

DAL proposes that the last two paragraphs of the REF (A) 'Reason' are revised in a manner that reflects these changes between new and superseded rules more explicitly through stating something similar to the following:



“Since that AD was issued, Airbus has identified the need to do additional modification in the affected area to allow for safe flight to the aircraft’s LoV. Airbus has also identified additional configurations that were not originally addressed in SB A320-57-1208 Rev 00. To address this, Airbus revised and issued the SB, as defined in this AD, to include these additional modification requirements and new specific configurations for the Commonwealth of Independent States (CIS) aeroplanes operation. Per this revised SB, aircraft modified under Rev 00 of SB A320-57-1208 will require additional rework that must be coordinated with Airbus.

For the reasons described above, EASA AD 2017-0117 is superseded and this superseding AD introduces the following new criteria: Grouping definitions based on aeroplane configuration (and resulting new/revised compliance times), a specific requirement to accomplish the revised SB in lieu of the original issue, and a specification that if the modification was accomplished per the original issue of the SB, coordination of additional work with Airbus is required.”

EASA response:

Comment partially agreed. Final AD has been amended to meet the commenter’s intent.

