

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-025

[Published on 17 February 2021 and officially closed for comments on 17 March 2021]

Commenter 1: Delta Air Lines – James Thompson – 12/03/2021

Comment # 1

References:

- (A) EASA Proposed Airworthiness Directive: PAD No. 21-025, dated 17 Feb 21
- (B) EASA Airworthiness Directive: No. 2021-0018, dated 15 Jan 21
- (C) Airbus Service Bulletin (SB) A350-52-P050, dated 15 Dec 20
- (D) Airbus Service Bulletin (SB) A350-52-P049, dated 15 Jan 21

1. As mentioned during the comment period for Ref (B), the inspection SB Ref (C) appears to refer to the “guide arms” as “rods” in certain instances and seems to use the two different terms interchangeably. In several places, Ref (C) refers to “rod rupture” and “rods” replacement within 15 days if the door faces an emergency opening with certain actuators.

In other paragraphs, Ref (C) refers to “guide arms” replacement if the door was opened in emergency mode with certain actuators. The A350 IPD refers to these parts as “guide arms”. In order to reduce confusion as to what part is to be replaced and to reduce the potential need for an AMOC when this AD is mandated by the FAA, Delta requests that EASA add a statement to the proposed AD which clearly defines that the terms “rod” and “guide arms” are used interchangeably in Ref (C).

2. Paragraph 3.C. of the inspection SB Ref (C) contains instructions to complete an Inspection Report Sheet form and send the completed form to Airbus. Ref (C), Paragraph 3.C is considered an RC paragraph and therefore the inspection results reporting are considered mandatory. Typically, reporting is needed from operators to determine root cause of the issue. The root cause of the safety concern addressed in Ref (A) is understood and is addressed by the modification SB Ref (D). Because the root cause is known, and corrective actions are to be mandated, Delta requests that a statement be added to the proposed AD Ref (A) exempting operators from any mandatory reporting required by Ref (C). Any reporting exemption in this case will not affect the intent of the AD or SBs or adversely affect the corrections to the airworthiness concerns addressed in this PAD.



EASA response:

1. *Comment noted. The terms “guide arm” and “rod” are both use in the SB, but the meaning is the same. The AD is consistently using “guide arm”. The TC Holder will consider a harmonisation of the terms at the opportunity of the next SB revision. The term “guide arm” will be the only one that will be used in the forthcoming revision to this SB, which matches the terminology used in the AD.*
2. *Comment not agreed. Only what is specified in the AD is mandatory, in this case “reporting” is not mandatory because it is not required by the AD. No changes have been made to the Final AD in response to these comments.*

Commenter 2: Deutsche Lufthansa – Jann Rauschenberger – 16/03/2021**Comment # 2**

DLH Engineering would like to Comment the PAD with the following:

1. Modification, paragraph (6):

DLH Engineering faces the Problem that in the mentioned Time Period (32 mth) not enough DEOA can be supplied to the whole A350 world fleet. Manufacturer of DEOA delivers in the actual situation only one not affected (modified) DEOA per month in exchange of an affected DEOA. As on DLH fleet 57 affected DEOA can be found, 29 have to be replaced in time, this will take therefore up to 29 month without any further delay driven by events such as Corona pandemic, AOG situations etc.

DLH Engineering therefore please EASA to extend the time frame for this partially modification.

2. In the time after the AD deadline, modification of one DEOA per door pair, there will be a high risk that an affected DEOA P/N FE396001001 will be installed back on a door already modified during maintenance activity which counter side still has an affected Part (P/N FE396001001) installed, leaving the A/C in a not airworthy condition.

DLH Engineering sees the update of Maintenance Procedures for DEOA, DEOA Reservoir and Slide/Raft removal/installation task and the IPD, carrying important, additional instructions as an essential measure to support the operators. The MP Tasks wording should contain requirements to check the opponent Door for its installed PN to satisfy the AD requirement. Additionally in case of an emergency opening of the door to pay attention to the installed DEOA PN during opening and therefore to pay special attention to the EAD paragraph REPLACEMENT and paragraph INSPECTION.

Furthermore, a one-way interchangeability of the affected DEOA PN within the IPD should be considered.



EASA response:

- 1. Comment not agreed. The AD compliance time has been decided based on the fleet safety risk. However, in this particular case EASA was informed that the TC Holder has ensured the DEOA supplier ramps up its capability to achieve a higher delivery rate, that will allow Operators to meet the compliance time requirement defined in the AD.**
 - 2. Comment noted. Paragraphs (8) and (9) of the AD control the installation of affected parts on the aeroplane and Operators need to have a system to control part installation in accordance with these paragraphs. Furthermore, EASA was informed that the TC Holder will update the interchangeability code in the IPD to "one way" and will inform if maintenance procedures need complementary information with regards to the opposite door part number.**
- No changes have been made to the Final AD in response to these comments.**

