

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-070

[Published on 12 May 2021 and officially closed for comments on 09 June 2021]

Commenter 1: ZHEJIANG LOONG AIRLINES CO.,LTD. – Eric Tian – 13/05/2021

Comment # 1

Since the initial defects found in 80VU, EASA or Airbus issued lots of orders for this case in about ten years. Neither matter modification nor inspection can solve this problem, but it brings a lot of burden on operators. We spend a lot of time, manhour, cost, etc. on this defect. We propose EASA requests Airbus to find the root reason and provide a terminating action. Until this goal is achieved, we do not think it is the right approach to issue any more orders to further waste the resources of operators.

EASA response:

Comment not agreed. EASA consider that a potential unsafe condition can develop from those cracks, and therefore, in line with its duty (refer to the EU regulation 748/2012, Annex I, 21.A.3), EASA require the necessary actions to maintain the safety of the fleet. EASA is aware, as for any action taken in the field of the Continued Airworthiness, about the burden this issue is putting on operators, and the several iterations in this topic are/were mainly resulted from the stress analysis of the area being complex to be modelised.

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

Commenter 2: Virgin Australia – Raj Nunkoo – 14/05/2021

Comment # 2

Queries:

- A. When does Airbus plan to revise SB A320-25-1BKJ?
- B. For Group 1 Aeroplanes (which relates to config.001 on SB 25-1BKJ) (see compliance table on the attached SB), if Airbus SB's 25-1557 & 53-1215 are embodied, the next inspection for the lower lateral fittings and lower central support will be after another 19,500 FC from SB's accomplishment. The



PAD (table 1) says that the repeat inspection is 500 FC. Can EASA confirm that there will be a repeat interval of 500 FC for the lower lateral fittings and lower central support, IRRESPECTIVE whether 25-1557 & 53-1215 are performed during the inspection?

- C. Similarly, for Group 3 & 4 (which relates to config.003 & 004 on the SB), if repairs have been performed, the next inspection for the lower lateral support will be after 19,500 FC from repairs. The PAD however, mentions a repeat inspection interval of 1,000 FC. Can EASA check if the repeat inspection will be 1,000 FC IRRESPECTIVE whether the repairs are done or not?

Suggestions:

- D. The PAD splits the different sections in Package A & B. Unfortunately, we find this hard to interpret.

We suggest that the AD includes one comprehensive table of compliance and not use Package A & B.

That is:

- i. split the table into four groups
- ii. for each group still include 3 rows for the affected part (lower lateral fittings, lower central support & central posts, shelves and upper attachments) AND detail the compliance (threshold and repeat interval) for each affected part.

On a note here, Table 1 on the PAD does not have a row for the central posts, shelves and upper attachments, even though paragraph (2) of the PAD says refer to Table 1 for the repeat interval.

EASA response:

2A) Airbus SB revision is expected in Q3 2021

2B) Refer to Note 2, stating that following embodiment of Airbus SB A320-53-1215 and SB A320-25-1557, a Group 1 aeroplane is then considered to be a Group 3 aeroplane. Next inspection is then due within 19 500 FC after SBs embodiment.

2C) Lower lateral support inspection is due within 19 500 FC since LAST repair iaw RI R53113174000 and R53113174001 (group 3) or RI R53113174002 and R53113174003 (Group 4), as applicable.

2D) Comment partially agreed. Table 2 has been added to indicate the initial Compliance Time and interval for package B affected parts. Table 1 title has been updated accordingly

No changes have been made to the Final AD in response to comments 2A, 2B and 2C

Commenter 3: British Airways – Tom Eldridge – 18/05/2021



Comment # 3

With reference to PAD 21-070:

- Package B parts are defined as the “80VU upper fittings, both LH and RH sides, central post and shelves attachments.”
- Para (2) does require repetitive inspections “at intervals not to exceed the value defined in Table 1 of this AD, as applicable”.
- However, Table 1 of the PAD 21-070, for Groups 3 & 4, does not require inspection of the upper fittings, central post & shelves attachments; it only refers to the lower lateral supports and the lower central supports.

With reference to AD 2021-0045:

- AD 2021-0045 Table 1 Groups 3 & 4 specifically calls out the central posts, shelves & upper attachments.

Thus, BAW understood the repetitive inspection on the Package B parts for Groups 3 & 4 had been removed.

Following your email that the repetitive inspections are required, BAW have re-reviewed the PAD and now understand that EASA intended the “Compliance Time” column of Table 1 to be read fully independently of the “Interval” column, and therefore repetitive inspections are required for every 500 FC for Groups 1 & 2, and every 1000 FC for Groups 3 & 4.

However, as described above, this was not clear and so BAW would suggest one of the two following routes:

- A) That a flag-note is added in Table 1 that the “Interval” applies to all affected (Package A & B) parts.
- B) That the format of the AD 2021-0045 Table 1 is retained, such that the “Compliance Time” column includes the Upper Fittings, Central Post & Shelves attachments called out as separate lines in Groups 2, 3 & 4 (noting that the compliance time for all areas is already 19500 FC from first flight for Group 1). Please see below for BAW’s suggested Table 1, given our current understanding of the compliance, following re-review of the PAD, with additions (relative to PAD 21-070 Table 1) highlighted in red.



Group	Compliance time (see Note 2 of this AD)	Intervals (not to exceed)
1	Package A & Package B Parts: Before exceeding 19 500 FC since aeroplane first flight, or since last repair in accordance with the instructions of Airbus SB A320-25A1555 at any Revision, or within 500 FC since the last inspection per Airbus SB A320-25A1555 at Revision 03, whichever occurs later	500 FC
2	Package A Parts: Within 19 500 FC after Airbus SB A320-25-1557 embodiment, or within 500 FC after the last inspection per Airbus SB A320-25A1555 at Revision 03, whichever occurs later Central posts, shelves and upper attachments: Within 19 500 FC since aeroplane first flight	
3	Lower lateral support: Within 19 500 FC after SB A320-25-1557 embodiment, or after last repair in accordance with RI R53113174000 and RI R53113174001, whichever occurs later Lower central support: Within 19 500 FC after SB A320-53-1215 embodiment Central posts, shelves and upper attachments: Within 19 500 FC since aeroplane first flight	1 000 FC
4	Lower lateral support: Before exceeding 19 500 FC since aeroplane first flight, or within 19 500 FC after last repair in accordance with RI R53113174000 and RI R53113174001, whichever occurs later Lower central support: Before exceeding 19 500 FC since aeroplane first flight Central posts, shelves and upper attachments: Before exceeding 19 500 FC since aeroplane first flight	

EASA response:

See EASA answer to comment 2D



Commenter 4: Sabena technics MIR – Amal Hassine – 19/05/2021**Comment # 4**

We notice in Table 1 specifically for Group 3 and 4 (LBT FLEET CONFIG), that the interval period to inspect the package B (central posts, shelves and upper attachments) is not mentioned, however, it is cited in the previous EAD 2021-0045 (1000FC).

Could you please provide with more information to clarify the situation for LBT fleet ?

EASA response:

See EASA answer to comment 2D

Commenter 5: United Airlines – Ali Nowrouzi – 04/06/2021**Comment # 5**

A) PAD 21-070, Definitions, The SB, identifies Airbus SB A320-25-1BKJ, Rev. 02 as the source document to perform the required inspections.

We request EASA to postpone issuing the new AD until a new revision of SB A320-25-1BKJ is available with sufficient time for operators to review the new SB.

We would like to point out that Airbus has issue Technical Adaptation (TA) 80827186/024/2020, dated 18 September 2020 to correct some of the discrepancies within SB A320-25-1BKJ, Rev. 02.

Following our review, we have found additional discrepancies within TA 80827186/024/2020. Additional discrepancies were communicated to Airbus per Dossier 80851009.

B) PAD 21-070, Package B Affected parts requires to accomplish the initial inspections within 19,500 FC from aircraft first flight or within 500 FC after the effective date of this AD, whichever occurs later.

We would like to state that we have 200 Airbus A319/A320 beyond 19,500 FC since aircraft first flight impacted with Package B Affected parts per PAD 21-070.

The requirements to perform initial inspection of Package B affected parts (Central Post, Shelves, and Upper Fittings) within 500 FC from effective date of new EASA AD with repetitive inspections at 1000 FC will be an enormous task to perform.



We would like to request EASA and Airbus to provide operators with expected fallout rate for Package B affected parts as a result of special detailed inspections per SB A320-25-1BKJ.

We would also like to request EASA and Airbus provide operators with the data that supports inspection threshold for Package B affected parts as stated in PAD 21-070.

- C) PAD 21-070, Table 1, group 3 airplanes requires within 19,500 FC after Airbus SB A320-25-1557 and SB A320-53-1215 embodiment accomplish an SDI of Package A affected parts, in accordance with instructions in SB A320-25-1BKJ.

We request EASA to add a paragraph to the proposed AD for operators to have an option to perform modifications per SB A320-25-1557 and SB A320-53-1215 again so threshold for inspection per SB A320-25-1BKJ could be pushed out for another 19,500 FC.

- D) PAD 21-070, Table 1, group 4 airplanes requires before exceeding 19,500 FC since aircraft first flight or within 500 FC after the effective date of this AD, whichever occurs later, accomplish an SDI of Package A affected parts, in accordance with instructions in SB A320-25-1BKJ.

We request EASA to add a paragraph to the proposed AD for operators to have an option to perform the repairs in accordance with RI R53113174002 and R53113174003 so threshold for inspection per SB A320-25-1BKJ could be pushed out for another 19,500FC.

- E) PAD 21-070, Reporting, in Paragraph (5) require Within 90 days after accomplishment of each SDI as required by paragraph (1) or (2) of this AD as applicable, or within 90 days after the effective date of this AD, whichever occurs later, report the inspection results (including no findings) to Airbus.

We request EASA to delete the requirement to report SDI with no findings to Airbus.

Please note that any aircraft with findings will be reported to Airbus. Therefore, mandating operators with large fleet of aircraft to report inspection results with no finding adds additional burden to the operators with no added value to Airbus.

EASA response:

5A) Comment not agreed. Available data does not support postponing the issuance of this AD, refer to answer to comment 2A for SB revision expected date

5B) EASA cannot provide the requested information to operators, as it is intellectual property of Airbus. Operators can anyway contact Airbus for additional information/data.

5C) Comment noted. This option is being reviewed and will be possibly included at a next SB revision, if agreed.

5D) See EASA answer to comment 2C

5E) Comment not agreed. Reporting with nil findings is only required for the initial inspection only.



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

Commenter 6: All NIPPON AIRWAYS – Yukihiro Bunno – 08/06/2021

Comment # 6

PAD 21-070 describes "For the reasons described above, this AD supersedes EASA AD 2012-0134, expands the Applicability and requires new repetitive inspections."

SB A320-25-1BKJ is still at Revision 02.

The required actions with compliance time and also interval seem identical.

It seems that only the difference is the usage of wording "Package A Affected part" and "Package B Affected part" which were not seen in EASA AD 2012-0134.

But it feel no practical change.

In short, it is not clear what's the practical difference between PAD 210-070 and EASA AD 2021-0045.

For reference, all of our aircraft in AD effectivity are in Group 4.

EASA response:

Comment not agreed. Compliance time have been actually updated from EASA AD 2021-0045.

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

Commenter 7: Lufthansa Technik AG– Thorsten Koch – 08/06/2021

Comment # 7

- A) As we have already outlined during PAD 20-132 comment phase and following the issuance of 2021-0045, we still consider that the potential damages to the secondary structural/equipment parts described under PAD 21-070 "Package B" do not warrant the need of an explicit conservative inspection requirement mandated by AD. We doubt that the failure of any of these parts would impose a hazardous or catastrophic condition to the aircraft (different from the rack



lower attachment fittings, whose failure would ultimately result in the collapse of the entire rack), that would warrant such inspection requirement. We feel that the inspection of these parts concurrently with the structural inspections provides an acceptable level of safety, like it did for nine years since the introduction of such inspection with EASA AD 2012-0134. This is particularly true for Groups 2 and 3, since inspections i.a.w. SB 25A155/AD 2012-0134 and the modifications i.a.w. SB 25-1557 and/or 53-1215, as applicable, already included inspection of these parts.

- a. The data to justify our opinion was delivered to EASA and Airbus during the PAD 20-132/ AD 2021-0045 comment phase, please refer to these.
 - b. We recommend that EASA and Airbus review the inspection results returned from the world fleet to re-assess the probability and the severity of the damages to those parts, with respect to a potential future alleviation of the inspection requirement by revision of the planned AD.
- B) For the same reason as specified in point 1 of our comments, we recommend that the interval for Package B should be 1000 FC for all Groups; We assume that there is only a little chance that there is a significant difference in the wear propagation rate for the upper fittings, or crack propagation rate for shelf attach brackets etc., for example in case of Group 2 (PRE 53-1215 pyramid, but inspected damage free) compared to Group 3 (POST 53-1215 pyramid) or Group 4 (POST 34804 pyramid).
- C) Package B Affected part list should mention “central posts” (plural), since there are two of them (Fwd/Aft).
- D) The lower lateral pyramids, a new inspection area introduced by SB 25-1BKJ (was not part of SB 25A1555) are mentioned neither in Package A nor B; should be clarified where these belong to.
- E) Package B Affected part list: Recommended to better explain shelves attachments (attached to what?) – i.e. “shelves attachment brackets at central posts and lateral posts”
- F) Table 1 Group 3 Lower Lateral Support: Compliance Time should read “[...], whichever occurs later”.
- G) We suggest to review Paragraph (5) for clarification purposes, e.g. “Within 90 days after accomplishment of *the initial* SDI as required by paragraph (1) or (2) of this AD, as applicable, or within 90 days after the effective date of this AD, whichever occurs later, report the inspection results (*including no findings*) to Airbus. *Thereafter, within 90 days after accomplishment of any subsequent repetitive SDI* as required by paragraph (1) or (2) of this AD, as applicable, or within 90 days after the effective date of this AD, whichever occurs later, *report inspection findings* to Airbus. *Inspection reports sent to Airbus for compliance with EASA AD 2021-0045 are acceptable to comply with the reporting requirements of paragraph (5) of this AD.* Using the inspection report attached to the SB is an acceptable, *yet not the only*, method to comply with this requirement.”

EASA response:

7A) Comment noted. Data provided, even if significant, is not representing the entire world fleet.

7B) Comment noted. The current available data do not support extension on the interval.

7C) Comment agreed. Final AD has been updated accordingly

7D) Comment agreed. Final AD has been updated accordingly.

7E) Comment agreed. Final AD has been updated accordingly

7F) Comment agreed. Final AD has been updated accordingly



7G) Comment noted. Reporting sent iaw AD 2021-0045 are already accepted under the clause “Required as indicated, unless accomplished previously”

No changes have been made to the Final AD in response to comments 7A, 7B and 7G

