

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-103

[Published on 22 July 2021 and officially closed for comments on 19 August 2021]

Commenter 1: Bangkok Airways – Paklaramon Laohasawad – 23/07/2021

Comment # 1

All A/C MSN of A318, A319, A320, and A321 are affected by this PAD, and some conditions were listed in PAD for an exception. However, to be excepted, we would like to know that our A/C need to meet all conditions or some of them are fine.

Could you please specify the 'and/or' to make the PAD more understandable?

EASA response:

The conditions for exception are independent. An a/c, meeting one of those conditions, is not affected by the AD.

There is no technical change from AD 2018-0218.

A different wording has been used in the Final AD.

Commenter 2: Hong Kong Express Airways – Derek Wong – 26/07/2021

Comment # 2

HKE would like a clarification on the applicability. Per PAD 21-103, it says the following:



Applicability:

Airbus A318-111, A318-112, A318-121, A318-122, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes, all manufacturer serial numbers, except:

- Aeroplanes on which Airbus modification (mod) 33421 was fully embodied in production;
- A318 aeroplanes on which Airbus mod 39195 was embodied in production, or on which Airbus Service Bulletin (SB) A320-00-1219 was embodied in service;
- A319 aeroplanes on which Airbus mod 28238, 28162 and 28342 were embodied in production;
- A319 and A320 aeroplanes on which the applicable modification SB was accomplished.

However, when comparing to the superseded AD 2018-0218, it had the 'and' relationship between these exceptions as shown below:

Applicability:

Airbus A318-111, A318-112, A318-121, A318-122, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes, all manufacturer serial numbers, except:

- aeroplanes on which Airbus modification (mod) 33421 was fully embodied in production, **and**
- A318 aeroplanes on which Airbus mod 39195 was embodied in production, or Airbus Service Bulletin (SB) A320-00-1219 was embodied in service, **and**
- A319 aeroplanes on which Airbus mod 28238, 28162 and 28342 were embodied in production, **and**
- A319 or A320 aeroplanes on which Airbus SB A320-57-1131, or SB A320-57-1137, or SB A320-57-1140 (at any revision) was accomplished, as applicable.

May I know if the released AD would retain the same exception criteria as per AD 2018-0218?

EASA response:

See EASA answer to comment 1



Commenter 3: Cathay Pacific Airways – Ivan Cheung – 04/08/2021**Comment # 3**

CPA have the follow questions:

- A. The applicable modification SB defined in the PAD, 57-1131 R02, 57-1137 R01 and 57-1140 R01, all of them have a later revision (57-1131 R03, 57-1137 R02 and 57-1140 R03). By the wordings of the PAD, does that mean any later revision of these SBs are consider not applicable?
- B. Further to question 1, in PAD paragraph 7, can accomplishment of the later revisions of the applicable modification SB constitutes terminating action for the SDI in paragraph (1) and (2)?
- C. Suggest to add “applicable” in front of “modification SB” in the “Reason” section where it wrote “Since that AD was issued, it has been..... the accomplishment of the modification SB, at any previous revision,” This will help aligning with the definition and avoid confusion.
- D. In table 2, what is the rationale behind the compliance time change for A321 from 29800 FH or 14900 FC to 29000 FH or 14900 FC? Or is it a typo? Are we expecting Airbus to issue a new revision to align it as well?
- E. In AD 2018-0218, the four applicability exceptions are joined with “and” criteria. In PAD 21-103, the “and” has been removed. Does EASA intend to remove it and clarify that by satisfying any one of the four exception rules would mean the Aircraft is not applicable in this AD?

EASA response:

- A) *The use of later approved revisions of those documents is acceptable for compliance with the requirements of this AD, as stated in the "Ref. publication" section of the AD. Note that Airbus SBs A320-57-1131 R03, A320-57-1137 R02 and A320-57-1140 R03 are listed in the "Ref. publication" section of the AD. The definition of "The applicable modification SB" identifies the minimum revision which is acceptable for compliance with the requirements of the AD. No changes have been made to the Final AD in response to this comment.***
- B) *See EASA answer above.***
- C) *Comment agreed. Final AD has been updated accordingly***
- D) *Comment agreed: EASA confirm a typo in the PAD. Final AD has been updated accordingly***
- E) *See EASA answer to comment 1***

Commenter 4: United Airlines – Ali Nowrouzi – 18/08/2021

Comment # 4

United Airlines (UAL) recommend that EASA to consider the following:

- Table 1 – Inspection Threshold for wing box lower stiffeners, Compliance Time, (whichever occurs later A, B, or C)
 - A319, Paragraph B: We request EASA to delete the requirements per paragraph B from Table 1 per the following:
 - o Airbus SB A320-57-1129, Rev. 06 states that “No additional work is required by this revision.”
 - o Any aircraft previously inspected per SB A320-57-1129, Rev. 03, or Rev. 04, or Rev. 05 will have inspection interval per Table 2
 - o Deleting the requirements per paragraph B from Table 1 will be consistent with the credit provided in paragraph 4 of the PAD 21-103
 - A320, Paragraph B: We request EASA to delete the requirements per paragraph B from Table 1 per the following:
 - o Airbus SB A320-57-1129, Rev. 06 states that “No additional work is required by this revision.”
 - o Any aircraft previously inspected per SB A320-57-1129, Rev. 03, or Rev. 04, or Rev. 05 will have inspection interval per Table 2
 - o Deleting the requirements per paragraph B from Table 1 will be consistent with the credit provided in paragraph 4 of the PAD 21-103

EASA response:

Comment not agreed. Table 1, paragraph B (for A319 and A320) provides a "grace period" of 12 months, with the limitation not to exceed the FC/FH interval from the last inspection accomplished iaw any previous revision of SB A320-57-1129 / A320-57-1130 (as applicable).

To be noted that paragraph 4 of the AD does not give credit to inspections accomplished iaw with the original issue, rev 1 or rev 2 of those bulletins. Without paragraph (b), some MSN could be grounded by this AD. Other wordings would require a complicated wording, with no real benefit for operators.

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

