

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-109

[Published on 27 July 2021 and officially closed for comments on 10 August 2021]

Commenter 1: Etihad Airways – Borja Dosal Roiz – 28/07/2021

Comment # 1

Etihad would like to make following comments on EASA PAD 21-109:

1. SB A350-53-P069 is categorized as Mandatory and this might be reflected in the AD.
2. RIL V53M21001346 has been issued by Airbus in order to facilitate SB A350-53-P069 embodiment by operators. We would like EASA to consider mentioning the RIL in the AD ref. publications.
3. AD Table 1 states the following panels shall be replaced:



Table 1 – Affected Part / Serviceable Part

Part Description	Affected Part (P/N)	Serviceable Part (P/N)
DOOR ASSY-198PR	V5248638100800	V5248638102000
	V5248638101000	
	V5248638101200	
	V5248638101400	
PANEL ASSY-198ES	V5338834600000	V5338834601200
	V5338834600400	
	V5338834600600	
	V5338834600800	
PANEL ASSY-198FS	V5338834700000	V5338834700400
PANEL ASSY-198HS	V5338834800000	V5338834800800
	V5338834800400	
	V5338834800600	
	V5338834800800	

The following A350 MSNs 0399 0402 0415 0420 0424 0426 0432 0434 0446 0482 fall under SB A350-53-P069 Configuration 002 and they do not require the replacement of panel ASSY-198HS, as can be seen on below extracted SB material section:

CONF 002**Interchangeable parts for task set A350-A-53-XX-P069-01000-93AA-A Modification**

DESCRIPTION	OLD PART No.	NEW PART No.	INT	SEE NOTES
DOOR ASSY-198PR	V5248638101000	V5248638102000	03	(1)
PANEL ASSY-198ES	V5338834600800	V5338834601200	03	(1)
PANEL ASSY-198FS	V5338834700000	V5338834700400	03	(1)
NOTE(S)				
For definitions of interchangeability codes in column INT, refer to ATA (CSDD Chapter 2).				
(1): The interchangeability possibilities are for new or modified parts introduced by the accomplishment of this Service Bulletin.				

Hence we recommend EASA to make a note on AD Table 1 stating that the part applicability will depend on the aircraft effectivity.

EASA response:

- The intent of the AD is to mandate modifications as per paragraph (1) in accordance with the instructions of SB A350-53-P069.***



2. *The SB A350-53-P069 provides the information to the operators to perform the necessary tasks. No need to mention the RIL in the AD ref. publications.*
3. *For applicability, the SB A350-53-P069 provides the part numbers (as contained in table 1) that shall be replaced for the corresponding MSN according to its own configuration, thus a note appears not be necessary in the AD.*

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

Commenter 2: Qatar Airways – Suan Phat – 02/08/2021

Comment # 2

Following QTR review on EASA PAD 21-109, it was noticed PANEL ASSY-198HS PN: V5338834800800 is defined as both “Affected Part” and “Serviceable Part” in Table 1.

This renders the incompatibility of the requirement of Paragraph (2), as the part may remain on post-MOD (retrofit or linefit) aircraft.

Below are some of the considerations during QTR review:

1. The “Serviceable Part” or post-MOD part should have a new assigned PN.
2. The aforementioned PN may not be affected, thus should not be listed in “Affected Part”.
3. In case indeed Table 1 is correct/accurate (for any reason), then the requirement of Paragraph (2) may need to be excluded for this PN and this peculiar situation needs to be further elaborated.

NOTE: Similar query has been raised concurrently to Airbus thru Dossier 80949084 for further clarification.

EASA response:

Comment agreed. It is confirmed that P/N V5338834800800 (PANEL ASSY-198HS) is not an affected part. The Final AD has been amended to remove P/N V5338834800800 from ‘affected part (P/N)’ column in Table 1 of the AD. Furthermore, TC Holder issued revision 01 of SB A350-53-P069 to correct the issue.

Commenter 3: Cathay Pacific Airways – Ivan Cheung – 09/08/2021



Comment # 3

With regards to PAD 21-109, CPA have the follow questions:

1. For door assembly 198PR, the current Airbus MP-IPD (see attached) allows PN V5248638101600 to be installed on some of the A350-1000, but this PN is not listed in the PAD nor is it in the SB 53-P069. Is this an affected part or serviceable part?
2. For PANEL ASSY-198HS, V5338834800800 is listed as both the affected part and the serviceable part. I noticed that similar situation happened in the SB 53-P069. Can EASA clarify whether this is a mistake or if there's any version difference, and if so, how should we identify the affected one from the serviceable one?

EASA response:

1. *Airbus confirms that Part number V5248638101600 is not an affected part in the frame of this AD, even if such part number is included in the Illustrated Part Catalogue.*
2. *Comment agreed. See EASA answers to Comments #2 above.*

