

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-159

[Published on 27 October 2021 and officially closed for comments on 24 November 2021]

### Commenter 1: Gulf Air – Mohamad Al Charif – 21/10/2021

#### Comment # 1

A. You state: "Affected part: Doghouses (for passenger cabin installation) as identified in the VSB, except those modified in accordance with the instructions of the SB or the VSB, as applicable."

Currently Gulf Air has Diehl PN D125211001-170 and D125212001-020 installed on A320 /321 NEO these PN are identified per VSB and never been modified per VSB or SB which render the AD applicable.

However, the SB 25-1BXK is applicable to our A320NEO and not A321NEO (most probably because it was changed in production where in all cases we could never know as there is no doghouse PN change pre/post mod, in addition the Airbus Aircraft Inspection reports do not show the details of these doghouses whether modified or not.)

What is more strange, is that based on the Diehl VSB A2-252-25-030 the pre/ post mod PN changes as follows:

Pre mod	Post mod (Diehl VSB R00)	Post mod (Diehl SB R01)
D125211001-170	D225211001-170	PN same as pre mod
D125212001-020	D225212001-020	PN same as pre mod

But our A321 NEO fleet having doghouses bearing the pre mod PN is not affected per Airbus SB!

You are kindly requested to change the above statement to state effectivity as per Airbus SB effectivity (if aircraft was never been altered from initial config). otherwise please advise if inspection verification would be mandatory to verify that placards "identified in VSB" but not effective per SB shall be inspected for correct instructions as we do not hold any reference whether these doghouses PN's on our brand new A321 NEO are modified in production or not.

Additionally, for the sake of argument, it is well understood that AD statement for compliance (per VSB) override the Airbus SB, however knowing that EASA issue AD against TC, STC, TSO, or equipment installed on a TC but never for a standalone equipment not holding a certification (like TSO items), wouldn't be more appropriate to have compliance IAW the SB which is issued by the TC holder rather than the VSB?



Furthermore, the approval of the Diehl VSB is referred to Airbus Approval No EASA.21J.031 and not the Diehl DOA approval (as the Airbus SB calls for this mod). But that SB does not cover (in our case) GF A321NEO fleet that is still in its original delivery status. In this context as the Airbus SB does not cover our A321 fleet, the Diehl VSB instructions baring the Airbus approval covers only what the Airbus SB list. Wouldn't that mean the modification instructions of the VSB are not approved for our A321 NEO?

For Airbus, you are kindly requested to review applicability of subject AD/SB/VSB to our A321NEO fleet (MSN: 9433, 10169, 10256 and 10306) and advise whether SB will be revised accordingly.

B. You state:

"Part(s) Installation:

(2) Do not install an affected part on any aeroplane, as required by paragraph (3.1) or (3.2) of this AD, as applicable."

Since a modified part is an affected part, this statement render impossible to move a modified part from an aircraft to another. we believe the meant condition is about an Unmodified affected part. appreciate if statement is changed from "affected" part to "unmodified affected part" especially that many doghouses does not get new PN after modification while others do. Unfortunately with the revised Diehl VSB it seems all PN won't be changed. (ref below as example):

Gulf Air A320 CEO fleet (4030, 4059, 4083, 4146, 4158, 4188, 4218, 4255, 4502, 4541 and 4780)

Pre mod	Post mod (as per Rev 00)	Post mod (as per Rev 01)
113341J	Unchanged	Unchanged
113342J	Unchanged	Unchanged
113415N	213415N	Unchanged
113416N	Unchanged	Unchanged

Gulf Air A321 CEO (5025, 5074, 5180, 5257, 5321 and 5336)

Pre mod	Post mod (as per Rev 00)	Post mod (as per Rev 00)
113342T	213342T	Unchanged
113341T	213341T	Unchanged

Remain for Diehl and Airbus to explain:

1. Why some doghouses initially installed from production on the same aircraft sometimes has PN change and sometimes retain the same PN. (ie example of our A320 CEO fleet, one out of 3 PN get a Post mod new PN). And why with the revised VSB it was reverted back to original PN?



2. Why an affected PN having a PN change after post mod could be unaffected on some aircraft noting that it has a pre mod PN (ie: D125211001-170, D125212001-020 installed on GFA A320 NEO, are affected and when modified will get new PN D225211001-170, D225212001-020, while on our A321 NEO same pre mod PN are installed and they are not affected as per Airbus SB).

**Note: PN with AMDT change is not trackable or identifiable unless physically checked where a change in production prior AD issuance might not even feature such amendment. In all cases even Airbus do not track amendment changes in aircraft inspection reports.**

3. The Airbus SB states compliance within 36 months of SB issue date, while AD, that prevails, state within 24 Months. If SB is planned to be revised (especially that it does not refer clearly to Diehl VSB Rev01 and it does not list any rework instructions of previously modified doghouses), appreciate if this can be corrected to be in line with the AD.

C. Finally, in case our above comments are accepted or partially accepted, please note that same matters would apply to:

- AD 2021-0136 tackling similar issue on A330/340.
- AD 2021-0162 tackling similar issue on A380.

We would leave this to your discretion to determine if these two AD's (applicable to fleets currently not operated by Gulf Air) need any adjustments.

**EASA response:**

**Comment 1A: Comment not agreed. The definition of affected part is not related to the a/c MSN. When an a/c is equipped with an affected part, that a/c is a Group 1 and actions are required by the AD must be accomplished.**

**Comment 1B: Comment not agreed. According to the definition provided in the AD, a part, identified in the VSB, is affected, except as modified in accordance with the instructions of the SB or VSB, as applicable. Following modification, doghouses must be reidentified as instructed in the applicable VSB.**

**Comment 1C: See EASA answers to previous comments.**

**Commenter 2: All Nippon Airways – Yukihiro Bunno – 01/11/2021**

**Comment # 2**

Airbus SB A320-25-1BXJ/-1BXK step 3.C require to replace the placards on doghouses in accordance with VSB.

ANA A320/A321 are equipped with Diehl doghouses, and are Group 1 aircraft.

Diehl VSB A2-252-25-030 step 3.C orders as follows:



**(c) Disassembly**

1 If necessary, remove and discard the old placard (Sheet 02), (Sheet 04).

**(d) Assembly**

1 Bond the placard (Sheet 03 - 1), (Sheet 05 - 1) over the old placard.

Furthermore the drawing A225225030 Flag Note 1 included in VSB A2-252-25-030 shows "NEW PLACARD TO BE LABELED ON TOP OF EXISTING"

This means that the new instruction placard can be installed on the existing placard.

On the other hand, PAD 21-159 Required Action (1) requires as follows:

(1) For Group 1 aeroplanes: Within 24 months after the effective date of this AD, remove the placard from each affected part and install an improved handling instructions placard on each affected part in accordance with the instructions of the SB and the VSB, as defined in this AD.

It seems that the existing placard must be removed and is not allowed to stay under the new placard.

We wonder if this may cause confusion.

For reference, the similar EASA AD 2021-0162 for A380 describes as follows.

Placard Installation:

(1) For Group 1 aeroplanes: Within 12 months after the effective date of this AD, install an improved handling instructions placard (either remove the existing placard or fix the new placard over the existing placard) on each affected part in accordance with the instructions of the SB.

**ACTION REQUESTED:**

Please change the Required Action (1) as follows such like EASA AD 2021-0162.

**WAS**

(1) For Group 1 aeroplanes: Within 24 months after the effective date of this AD, remove the placard from each affected part and install an improved handling instructions placard on each affected part in accordance with the instructions of the SB and the VSB.

**IS**

(1) For Group 1 aeroplanes: Within 24 months after the effective date of this AD, install an improved handling instructions placard (either remove the existing placard or fix the new placard over the existing placard) on each affected part in accordance with the instructions of the SB and the VSB.

***EASA response:***

***Comment agreed. Final AD has been updated accordingly.***



**Commenter 3: Brussels Airlines – Gregory Greck – 09/11/2021****Comment # 3**

Concern:

- PAD N°: 21-159
- ATA 25
- Equipment / Furnishings – Doghouse Placard – Installation

According to PAD, affected parts are parts listed in VSB 204XXX0-25-001 or in VSB A2-252-25-030.

But we found some units on our fleet with an EPA P/N marking (European Part Approval) which is not listed in above VSBs.

For example, we found following P/N installed on some aircrafts:

- P/N: EPA113431P
- P/N: EPA113432P

But according to PAD, AIRBUS SB and OEM VSB A2-252-25-030, these units are not affected because only following P/N are listed:

- P/N: 113431P
- P/N: 113432P

We contacted OEM to ensure that units P/N: EPA113431P & P/N: EPA113432P are not affected but they confirmed that the finding is also applicable to the doghouses with an EPA P/N marking.

Can you investigate this point?

**EASA response:**

***According to part 21 (paragraph 21.A.804), the EPA marking has to be used for “parts or appliances produced in accordance with approved design data not belonging to the type-certificate holder of the related product, except for ETSO articles”. Relevant GM also clarifies that “The EPA marking only applies to the parts, specifically designed or modified for the repair, to be incorporated as part of the repair design. If the repair scheme does not require the addition of any new parts or the use of modified parts, there is no need to mark the repaired part with the letters ‘EPA’.”***

***You should contact the design organization that supplied the design data used to manufacture that part, since they should determine whether those parts are affected by the same unsafe condition addressed by the AD and instruct you on how to proceed.***

***In any case please note the PAD Remark #3, or AD Remark #4, providing clarification on reporting requirements for parts not affected by the (P)AD.***



**Commenter 4: All Nippon Airways – Yukihiro Bunno – 19/11/2021****Comment # 4**

Airbus SB A320-25-1BXJ/-1BXK shows within 36 months as Compliance Time.

On the other hand, PAD 21-159 requires within 24 months shorter than SB.

As of now, we operate total 33 A320/A321 aircraft which is equipped with Diehl doghouse.

We have no reports regarding the broken latch.

Please investigate the compliance time 36 months for the aircraft with Diehl doghouse.

**EASA response:**

***Comment not agreed. Based on existing data, EASA considers adequate the proposed compliance time. No changes have been made to the Final AD in response to this comment.***

