

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-160

[Published on 28 October 2021 and officially closed for comments on 11 November 2021]

### Commenter 1: Japan Airlines – Masamitsu Saito – 10/11/2021

#### Comment # 1

Airbus SB A350-57-P067 as the inspection SB is issued for a one-time Detailed Visual Inspection of the sealant application and, if required, application of sealant to restore second layer of edge glow protection.

On the other hand, in Airbus SB A350-57-P070 as the modification SB, sealant has to be applied to same portions as Airbus SB A350-57-P067. Once the SB A350-57-P067 is accomplished, the sealant application of the SB A350-57-P070 is not possible to same portions as Airbus SB A350-57-P067.

If the compliance time is the same between the SB A350-57-P067 and SB A350-57-P070, JAL believes that it should be described in this AD that these can be carried out at the same time in order to avoid duplication of the sealant application.

#### EASA response:

**Comment noted. Note that the Inspection SB and the Modification SB are complementary and do not request to perform inspection & or corrective action at the same locations.**

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

### Commenter 2: Lufthansa Technik AG – Thorsten Koch – 11/11/2021

#### Comment # 2

We recommend that the AD should provide some guidance as to what is considered a “scheduled” tank entry. Does “scheduled” refer only to those repetitive maintenance tasks listed in the MRBR/ALS, and thereby are “scheduled” in the operator’s AMP?

Or does it also embrace any other maintenance tasks outside MRBR/ALS, that may require tank opening, e.g. to access the fuel pumps.



**EASA response:**

*Comment noted. The text “...next scheduled maintenance tank entry..” is an existing requirement coming from AD 2020-0220. In the EASA system, ‘scheduled maintenance’ are tasks coming from the operator’s maintenance programme and continued airworthiness management processes (e.g. ALS, AD or other repetitive inspections); whereas unscheduled maintenance covers the rectification of any defect and damage. EASA cannot advise on what is considered “scheduled maintenance” in other national systems, and suggests operators consult with their National Aviation Authority if interpretations are required.*

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

**Commenter 3: Deutsche Lufthansa AG – Andreas Uhl – 12/11/2021**
**Comment # 3**

Our reviewing of PAD, brought up the following queries regarding the section „At the next scheduled maintenance tank entry“ in PAD paragraphs (1) Inspection and (3) Modification.

Does „Scheduled“ refer to maintenance action driven by the Aircraft Maintenance Program, with source MRBR and ALS or does it also include Tank entry events for finding rectification as for example of fuel leaks or access to tank installations (fuel pumps, sensors etc.).

If it would include also such kind of „unscheduled“ events, it would have a huge impact on maintenance planning and operation.

Could you please specify in more detail. Thank you.

**EASA response:**

*See response for Comment # 2.*

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



**Commenter 4: Cathay Pacific – Brian Tong – 06/01/2022****Comment # 4**

Refer to PAD 21-160 Para (3), it requires “At the next scheduled maintenance tank entry, or before exceeding 78 months since Airbus date of manufacture, whichever occurs first after the effective date of this AD, apply sealant to the upper rib feet in the LH and RH wings in accordance with the instructions of the modification SB”.

We have obtained the response from your office on AD 2020-0220 (the superseding AD) that, “Scheduled maintenance meant when the operator has planned to go into the tank, thus excluding cases where the operator has to go into the tank in an unplanned manner for a defect.”

Since the modification as per para (3) requires long maintenance input time and could induce operation impact, grateful if EASA can confirm:

*If a repetitive inspection / permanent repair is required after repair iaw RDAF requirement (which the repetitive inspection / permanent repair require fuel tank entry), that inspection / repair is **NOT** classified as scheduled maintenance task.*

**EASA response:**

**See response for Comment # 2.**

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

**Note: Airbus applicability clarification**

Since PAD 21-160 was published Airbus issued modification (Mod) 116294 to provide the final fix for the unsafe condition. Those aeroplanes that have Mod 116294 embodied in production are excluded from the Definition of Group 2. The final AD has been modified to show this applicability clarification.

