

COMMENT RESPONSE DOCUMENT

EASA PAD No. 21-173

[Published on 26 November 2021 and officially closed for comments on 10 December 2021]

Commenter 1: Japan Airlines (JAL) – Ishibashi Yuichi – 29/11/2021

Comment # 1

(A) In item 3.C.(3) NOTE of SB 52-P043, it is described that "To send the Inspection Report sheet is not Required for Compliance (RC).".

On the other, in item Reporting: (4) of the PAD, it is described that this procedure is required action.

JAL believes this action is not RC as described in the SB.

(B) In item 3.C.(1)(a)1a NOTE of SB 52-P043, it is described that "For every inspection that follows with no finding, do not report the inspection result.".

On the other, in item Reporting: (5) of the PAD, it is described that this procedure is required.

JAL believes this action is not required if no finding, as described in the SB.

(C) In item 3.C.(2)(a)3a<3> of SB 52-P043, two MPs are referred to perform gap check between the sensor and target of two closed sensors.

However, these two MPs are deleted on SEP-2021.

For this, JAL believes RDAF is acceptable for compliance with the requirements of this AD until SB revised.

EASA response:

(A) In case of discrepancy between Airbus SB instructions and EASA AD requirements, the AD requirements apply. As the reporting is part of the "Required Action(s) and Compliance Time(s)" paragraph of the PAD, the reporting from initial GVI inspection as described in the future EASA AD will become mandatory from the AD effective date.

(B) Comment agreed. It is only necessary to report findings from the repetitive GVI inspections. This reporting is already covered by paragraph (2): "depending on findings, accomplish any applicable follow-up action(s) in accordance with the instructions of the SB, including contacting Airbus". Paragraph (5) deleted from the final AD.

(C) Both MP tasks ref. A350-A-52-71-14-00ZZZ-270Z-A & A350-A-52-71-15-00ZZZ-270Z-A are indeed no longer enclosed in the line maintenance documentation.

The respective tasks numbers will be updated in revision R02 of the Airbus SB as follows:

A350-A-52-11-73-0DZZZ-270Z-A --> Adjustment of the Closed Proximity Sensors of Passenger/Crew Door 1, Left/Right Side

A350-A-52-12-73-0CZZZ-270Z-A --> Adjustment of the Closed Proximity Sensors of Passenger/Crew Door 2, Left/Right Side, and Passenger/Crew Door 3, Left/Right Side

A350-A-52-13-73-0CZZZ-270Z-A --> Adjustment of the Closed Proximity Sensors of Passenger/Crew Door 4, Left/Right Side

Until SB revision R02 publication, the use of the instructions from Airbus Repair Design Approval Form (RDAF) will be acceptable for compliance with the requirements of paragraph (2) of the AD, as indicated in Note 2 of the PAD.

Commenter 2: Japan Airlines (JAL) – Ishibashi Yuichi – 06/12/2021

Comment # 2

SB52-P043 Rev.01 was issued on 30-Nov.-21 to incorporate updated MP tasks and removes discrepancies in the Inspection Report Sheet and correct the sentence of CAUTION.

In this time, JAL found following inconsistency.

In your response, it is mentioned following three MPs are being updated.

NOTE: JAL is already started SB using advance copy of these MPs.

A350-A-52-11-73-0DZZZ-270Z-A --> Adjustment of the Closed Proximity Sensors of Passenger/Crew Door 1, Left/Right Side

A350-A-52-12-73-0CZZZ-270Z-A --> Adjustment of the Closed Proximity Sensors of Passenger/Crew Door 2, Left/Right Side, and Passenger/Crew Door 3, Left/Right Side

A350-A-52-13-73-0CZZZ-270Z-A --> Adjustment of the Closed Proximity Sensors of Passenger/Crew Door 4, Left/Right Side

On the other, following three MPs are incorporated in SB Rev.01.

NOTE: followings MPs are not for PAX door closed sensor but for Adjustment of the Slide Lever Switch of Passenger/Crew Door.

-----excerpt of SB52-P043-----



<3> If the door stop screw(s) are replaced at the aft door side, check and ensure in addition the gap between the sensor and target of the two closed sensors, refer to

- Ref. MP A350-A-52-11-73-01ZZZ-270Z-A for door 1 (LH/RH)
- Ref. MP A350-A-52-12-73-01ZZZ-270Z-A for doors 2 and 3(LH/RH)
- Ref. MP A350-A-52-13-73-01ZZZ-270Z-A for door 4 (LH/RH).

For above reasons, JAL believes it is required to revise again Rev. 01 to correct above inconsistency before issue AD.

EASA response:

See the response to Comment 1 (C)

Commenter 3: Qatar Airways – SuanPhat FOO – 06/12/2021

Comment # 3

QTR believes that EASA is aware of MSB A350-52-P043 dated 30-Nov-2021 and, presumably, will update the corresponding details (to reflect R01) upon AD publication.

Meanwhile, operators most probably already started the inspection i.a.w MSB R00 due to the restrictive threshold (QTR certainly did). Therefore, kindly consider adding credits to any previous accomplishment (MSB R00 and that prior AD effective date).

EASA response:

Noted. MSB A350-52-P043 R01 dated 30-Nov-2021 added to the AD. Both versions of the SB can be used to show compliance with the AD.

Commenter 4: Lufthansa Technik AG – Thorsten Koch – 06/12/2021

Comment # 4



Please find below the combined comments of Deutsche Lufthansa (CLH) CAMO, and Lufthansa Technik on behalf of German Airforce (GAF) for PAD 21-173.

(A) Paragraph (4): We challenge the required limit of 30 days for reporting the inspection results to Airbus. Rationale:

- (i) In case of findings, it is acceptable by PAD Para. (2) and the applicable SB instructions (compliance time) to operate the aircraft for 50 FC or even 400 FC, depending on findings, until Airbus is contacted for corrective instructions. For many operators, these flightcycle values correspond to timeframes larger than 30 days. As such, when it is from a safety perspective acceptable to fly for a time period longer than 30 days, it does not seem reasonable to mandate the report of even NIL findings earlier than that?
- (ii) Secondly, as per M.A.305, the accepted maximum time period for the review of maintenance records is 30 days. It may be impractical for the CAMO to have the necessary data prepared, assessed and submitted to Airbus before those 30 days.
- (iii) We therefore propose to change the compliance time to 90 days.

(B) Paragraph (5): We propose to delete this paragraph completely. Rationale:

- (i) Paragraph (2) mandates to contact Airbus in case of findings, based on SB instructions. The SB instructs that Airbus must be contacted in case of any finding during any inspection, within the compliance times provided in the SB (50FC or 400 FC). As such, Airbus will always be contacted, thus there is no need to mandate it by a separate paragraph (is already covered by paragraph (2)).
- (ii) Secondly, since Airbus must evaluate all the historic number and type of findings on any door ever installed on the affected door position to determine the corrective instructions and DT inspections, this is inherent part of the request to contact Airbus as already requested by paragraph (2).

(C) Paragraph (4): While paragraph (5) seems to be unnecessary, paragraph (4) is lacking the requirement to report also historical findings. But these will be necessary to get the full picture. The SB includes such requirement in paragraph 3.C.1. – from a safety perspective, the AD should adopt this requirement



(a) On all doors, do a visual inspection of all door stop screws on the FWD and AFT sides of the doors for missing screw heads.

1 In case of no finding during current inspection:

a After completion of all visual inspections, complete and send the Inspection Report sheet in accordance with Ref. Task A350-A-52-XX-P043-02ZZZ-90AZ-A.

NOTE: During first inspection, the inspection report shall include the current no finding and the previous finding(s) occurred before this inspection, if any.

NOTE: For every inspection that follows with no finding, do not report the inspection result.

(D) We recommend to add a note that this AD affects a Removable Structural Component (RSC), and that both damage history and any corrective actions or DTI must be followed up when a door is removed and installed on another airplane. This tracking must occur for the remaining service life of the door, unless a corrective action is accomplished on that door that would permanently remove the fatigue concerns. Which means in fact that, before installing a Pax Door on any airplane, a) the maintenance history of the door must be checked for any previous findings and previous Airbus instructions, and b) Airbus must be contacted to review the RDAF, since the DTI are different (according to Airbus), depending the AC series (-900/-1000), the AC MSN and the installation location (door position).

Summary:

- (1) Delete (5)
- (2) Amend: (4) Within 90 days after the initial GVI as required by paragraph (1) of this AD, report the inspection results to Airbus (including no findings). The reporting shall include all previous findings occurred before this inspection, if any.
- (3) Add Note or Paragraph to address the RSC aspects in terms of tracking findings, repairs, and DT inspections at door PNR/SER level.

EASA response:

(A) Comment not agreed. 30 day reporting is not onerous.

(B) See the response to Comment 1 (B).

(C) Agreed. Paragraph (4) amended accordingly.

(D) Not agreed. It is current practice for components that are affected by an AD which can be swapped between aircraft, for operators to ensure that AD compliance is ensured on both the donor and recipient aircraft.



