

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-030

[Published on 22 March 2022 and officially closed for comments on 19 April 2022]

Commenter 1: British Airways – Tom Eldridge – 25/03/2022

Comment # 1

BAW has received your PAD 22-030, dated 22 March 22, and wishes to make the following comments:

1. BAW has alerted Airbus to corrections that had previously been made to SB A320-25-1BKJ Rev 02 and approved by Airbus RDAFs, which have not been included in the SB at revision 03. This was reported to Airbus on dossier 81030618. Airbus has informed BAW that the SB will be revised to Rev 04 by 5th May 2022, with the necessary corrections made.

Would EASA consider waiting until the corrected SB at revision 04 has been published prior to issuing a mandate?

2. BAW notes that the PAD provides both a 'Threshold' and a 'Compliance Time' in Table 1.

For the avoidance of doubt, please can EASA confirm that by 'Compliance Time' they mean 'Grace Period'?

3. BAW would like to question the wording of Para (3) of this PAD; following internal review, BAW has been unable to confirm what is meant by "the 'initial' requirements of paragraph (2)".

Please would EASA review the wording of this paragraph?

EASA response:

Comment 1 agreed. The Final AD will refer to corrected Airbus SB A320-25-1BKJ Revision 04.

Comment 2 partially agreed. The Final AD has been amended to define and mandate a threshold for the initial inspection and an interval for the subsequent inspections.

Comment 3 noted. Provided no damage was found on lateral fittings, SB A320-25-1BKJ Revision 03 allowed accomplishment of SB A320-53-1215 only (without concurrent accomplishment of the RI) as corrective action. If SB Revision 02 was previously accomplished, the paragraph clarifies that this is acceptable to address findings made during an ('initial') inspection that was accomplished before the effective date of this AD. From the effective date of this AD, corrective actions will have to be accomplished in accordance with the instructions of SB A320-25-1BKJ Revision 04. No change has been made to the AD further to this comment.

Commenter 2: United Airlines – Ali Nowrouzi – 11/04/2022**Comment # 2**

In reference to EASA PAD 22-030, dated 22 March 2022, superseding EASA AD 2021-0172, United Airlines (UAL) would like for EASA to consider the following:

PAD 22-030, Definitions, The SB, identifies Airbus SB A320-25-1BKJ, Rev. 03 as source document to perform the required inspections.

SB A320-25-1BKJ, Rev. 03, in Required for Compliance (RC) section, in multiple locations including in Task A320-A-25-XX-1BKJ-01003-346A-A requires to do SDI using a borescope. Refer to NTM 51-90-00.

NTM 51-90-00 (attached) provides instructions for a general visual testing. This NTM states if the geometry and location of, or access to inspection area conceals the part which is to be inspected, visual aids may be used - mirror, magnifying glass, endoscope, etc.

UAL has received comments from inspection staff indicating that borescope is a qualification and not all inspectors are borescope qualified.

Per Technical Request (TR) 81027832/001, dated 16 February 2022 (TR attached), UAL request Airbus to review SDI requirements in SB A320-25-1BKJ and to revise applicable tasks to do SDI from borescope to endoscope. Refer to NTM 51-90-00.

Airbus in Technical Request 81027832/008, dated 21 February 2022 (TR attached), informed UAL that wording will be modified with the next SB revision opportunity.

UAL request EASA provide operators with option to perform the SDI using borescope or endoscope. Refer to NTM 51-90-00.

EASA response:

Comment noted. The Final AD refers to Airbus SB A320-25-1BKJ Revision 04 which instructs to accomplish the SDI using borescope or endoscope.



Commenter 3: Air New Zealand – Mark Pritchard – 14/04/2022**Comment # 3**

Air New Zealand N/B Fleet Group is currently in review of the EASA PAD No. 22-030 (Equipment Furnishings – 80 VU Rack Attachments – Inspection / repair) along with the Airbus SB A320-25-1BKJ Revision 03 and notes that the SB contains one A320-271N (MSN 10044) aircraft within the Models Applicability, which has been added for the operator.

We wish to comment that the EASA PAD No. 22-030 does not reflect in the Applicability section the Airbus A320-271N model and was wondering if this will or will not be added to the Final AD.

EASA response:

Comment noted. Model A320-271N was erroneously included in the SB. Refer to AD applicability. No change has been made to the Final AD in response to this comment.

Commenter 4: All Nippon Airways – Yukihiro Bunno – 15/04/2022**Comment # 4**

We believe that the main point of PAD 22-030 is to combine and summarize the Geoup 1/2/3/4, Package A/B, Compliance Time and Interval which are shown in two tables of EASA AD 2021-0172 to only one table using the new words "Zone" and "Threshold".

Supposing that this understanding is correct, we have some queries and comments.

Our aircrafts in effectivity are all in Group 4 of PAD (= Conf 004 of SB)

Those aircrafts have not been repaired by RI No. R53113174.

In table 1 of PAD, Group 4 Zone A describes " ,,,,,,after last repair per RI R53113174002 and R53113174003, ,,,,,".

On the other hand, in page 60, para 1. A. (4) Configuration definition of SB Rev.3, Configuration 004 refers to " ,,,,,Repair Instruction No. R53113174000 LH and R53113174001 RH,,,,".

We guess either PAD or SB may be typo.



	C	Before exceeding 19 500 FC since aeroplane first flight		
4	A	Before exceeding 19 500 FC since aeroplane first flight or within 19 500 FC after <u>last repair per RI R53113174002 and R53113174003, whichever occurs later</u>	Within 500 FC after 03 August 2021 [the effective date of EASA AD 2021-0172]	1 000 FC
	B	Before exceeding 19 500 FC since aeroplane first flight		
	C	Before exceeding 19 500 FC since aeroplane first flight		

CONF 004**Configuration 004**

CONF 004 is applicable for all the aircraft on which:

- MOD No. 34804P8794 is embodied,

REV 00 Aug 23/18
REV 03 Feb 17/22

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SERVICE BULLETIN

- Repair Instruction No. R53113174000 LH and R53113174001 RH are not accomplished,
- OR
- MOD No. 34804P8794 is embodied,
- Repair Instruction No. R53113174000 LH and R53113174001 RH are accomplished.

Please confirm if which is correct.

Please revise the wrong one.

EASA response:

Comment noted. The correct RI references for Configuration 004 are R53113174002 and R53113174003, refer to SB paragraph 1.E 'Compliance'. No change has been made to the Final AD in response to this comment.



Commenter 5: Air Canada – Jack Szeto – 18/04/2022**Comment # 5**

Regarding EASA PAD 22-030 issued March 22, 2022, Air Canada has the following comments:

1. SBA320-25-1BKJ Rev 2 and SBA320-25-1BKJ Rev 3 have equivalent instructions and requirements for workscope of Special Detail Inspections (SDIs), except Inspection instructions are now more clearly separated in 3 areas. The current wording of PAD22-030 does not allow Airline Operators to take credit for SDI inspections per SBA320-25-1BKJ Rev 2.
 - a. Please include “Credit” statement to clearly state that Inspections per SBA320-25-2BKJ Rev 2 prior to effective date of this AD is acceptable to comply with the requirements of Paragraph (1).
 - b. Please consider including “Credit” to allow Airline Operators to continue using SBA320-25-2BKJ Rev 2 to take compliance to new AD (with a grace period of 6-12 months), to ensure all Task Cards/Work Instructions can be updated in a timely manner from when PAD22-030 becomes an AD.
2. Regarding PAD20-030 paragraph (3), the wording seems to suggest that Airbus SB A320-53-1215 must be concurrently performed with RI R53113174000 and RI R53113174001 after the effective date of this AD. For Airline Operators who are choosing to pro-actively embody SBA320-53-1215 to convert Group 2 aircraft to Group 3 (NOT as result of damage), can EASA please confirm that RI R53113174000 and RI R53113174001 are NOT a concurrent requirement?

EASA response:

Comment 1.a. agreed. A Credit paragraph (3) was added in the Final AD to accept inspections and corrective actions accomplished in accordance with Airbus SB A320-25-1BKJ Revision 02 and Revision 03.

Comment 1.b. noted. EASA will support treatment via individual AMOC as necessary upon request to the State of Registry authority. No change has been made to the Final AD in response to this comment.

Comment 2 agreed. Credit paragraph (4) in the Final AD has been rephrased to apply only to those Group 2 aeroplanes on which damage was found during SDI. It is confirmed that Group 2 aeroplanes with SDI findings, outside of the lateral fittings, can be converted into Group 3 aeroplanes through embodiment of Airbus SB A320-53-1215 only.



Commenter 6: Delta Air Lines – Cecilia Teeuwen – 19/04/2022
Comment # 6
References:

(A) EASA Proposed Airworthiness Directive (PAD) No. 22-030, issued 22 Mar 2022

(B) EASA Airworthiness Directive (AD) No. 2021-0172, dated 20 Jul 2021

(C) FAA Airworthiness Directive (AD) No. 2022-06-02, dated 08 Mar 2022

(D) Service Bulletin (SB) A320-25-1BKJ Rev 02, dated 09 Apr 2022

(E) Service Bulletin (SB) A320-25-1BKJ Rev 03, dated 17 Feb 2022

(F) Service Bulletin (SB) A320-53-1215 (any revision)

(G) Service Bulletin (SB) A320-25A1555 (any revision)

(H) Service Bulletin (SB) A320-25-1557 (any revision)

1. Clarification on REF (E) and REF (F) referenced in REF (A) Para (3) "Credit".

In REF (A) Para (3) "Credit", REF (F) is mentioned. In the same sentence, there's a reference to "The SB". According to the initial definition of "The SB" "the SB" would refer to REF (E). DAL believes this could be confusing for the following reasons:

a. Having another SB, other than REF (F), being referred to indirectly through use of the phrase "The SB" all in the same sentence could be confusing to operators. Operators could overlook "The SB" and its technical definition, mistaking the reference for REF (F).

b. Throughout REF (A), "the SB" is being referred to in the "Reason" as well as Paras (1) "Inspections", (2) "Corrective Actions", and (3) "Credit". However, DAL notes that in Para (3) "Credit", "The SB" is referenced while also explicitly calling out Rev. 02. Since "The SB" is defined as being specifically REF (E), referencing Rev 02 in conjunction with that phrase is confusing and contradictory (i.e. like saying: SB A320-25-1BKJ Revision 03 at Revision 02).

To add clarification, avoid misinterpretation and eliminate conflicting information of REF (A) Para (3) "Credit", DAL suggests that the reference is made clearer by explicitly mentioning in the subject paragraph which service bulletin is being referenced (and at what revision level) instead of using the phrase "the SB". This would avoid confusion and prevent misunderstandings and eliminate conflicting information regarding credit for previous work that can be utilized.

Revise REF (A) Para (3) "Credit" as follows:



- Instead of:

- o “(...) in accordance with the instructions of the SB at Revision 02 (...)”

- Use the following verbiage, or similar:

- o “(...) in accordance with the instructions of SB A320-25-1BKJ at Revision 02 or Revision 03 (...)”

Note: Full REF (A) Para (3) “Credit” not shown above, only verbiage specifically where change is requested.

2. Revise REF (A) Para (3) “Credit” - Reference Para (1) and Para (2).

In REF (A) Para (3) “Credit” there’s a reference to Para (2), however, Para (2) discusses the Corrective Action requirements. DAL believes this might be a typo and this sentence was meant to reference not only this paragraph, but also Para (1) which outlines Inspection requirements.

DAL believes that REF (A) Para (3) “Credit” outlines previously accomplished actions that can be used to claim credit for mandatory Para (1) inspections and Para (2) corrective actions if REF (D) was used – this is an earlier SB revision that is not specifically allowed by Para (1) or Para (2), which require use of REF (E) for both inspections and corrective actions. However, instead of referencing the REF (A) Para (1) “Inspections” when specifying which paragraphs credit can be claimed for, this “Credit” Paragraph references REF (A) Para (2) “Corrective Actions” only. With the verbiage as written, DAL and other operators will not have a means to claim credit for initial inspections required by REF (A) Para (1) if REF (D) (earlier SB revision) was accomplished in lieu of REF (E), which is the required revision level for Para (1) and Para (2) per the definition of “The SB”.

Revise REF (A) Para (3) “Credit” as follows:

- Instead of:

- o “(...) is acceptable to comply with the initial requirements of paragraph (2) of this AD for that aeroplane (...)”

- Use the following verbiage, or similar:

- o “(...) is acceptable to comply with the initial requirements of paragraph (1) and (2) of this AD for that aeroplane (...)”

Note: Full REF (A) Para (3) “Credit” not shown above, only verbiage specifically where change is requested.

3. REF (A) Table 1 –Inspection Threshold - Create Uniform Spacing between ALL “or” Options (formatting).

Formatting “Threshold” options in REF (A) Table 1:

a. Different REF (A) Table 1 “Threshold” column options are distinguished by an “or”. However, the “or” is not always obvious to the reader since it is not always spaced out consistently/uniformly. On some occasions, the “or” can make a clear distinction between the different options since the “or” it has its own line. See example below in green highlighting.



However, in other occasions, the “or” is blended in and can be easily lost within the line of text. This spacing and formatting style is inconsistent with what was described above and does not help visually reflect the number of options available clearly. See example below in red highlighting.

Before exceeding 19 500 flight cycles (FC) since
aeroplane
first flight **or** since last repair per Airbus SB
A320-25A1555 at any revision,
or
within 500 FC since last inspection per
Airbus SB A320-25A1555 Revision 3,
whichever occurs later

b. DAL believes the “or” issue discussed above in Item 1 stems from the initial phrase “Before exceeding 19 500 FC since (...)” being omitted in certain instances to simplify verbiage and avoid duplication when there are multiple time of accomplishment options that involve 19,500 FC. Given that REF (A) combines this phrase with separate time of accomplishment options, it could be unclear to the reader. See example below:

Before exceeding 19 500 FC since aeroplane
first flight or since last repair per Airbus SB
A320-25A1555 at any revision,

There is an instance in REF (A) Table 1, where the 19500 FC condition was not omitted to simplify verbiage. This helps reduce possible misinterpretation. See example below:

Before exceeding 19 500 FC since aeroplane
first flight or within 19 500 FC after last repair
per RI R53113174002 and R53113174003,
whichever occurs later

DAL suggests reformatting the “Threshold” options in REF (A) Table 1 to help reduce possible confusion or human error since the subject table outlines so many different times of accomplishment options.

Revise REF (A) Table 1, Inspection Threshold, as follows:

- In lieu of:
 - o “Before exceeding 19 500 flight cycles (FC) since aeroplane first flight or since last repair per Airbus SB A320-25A1555 at any revision,
 - Or
 - within 500 FC since last inspection per Airbus SB A320-25A1555 Revision 3, whichever occurs later”
- Use the following verbiage, or similar:



o “Before exceeding 19 500 flight cycles (FC) since aeroplane first flight

Or

Before exceeding 19 500 flight cycles (FC) since last repair per Airbus SB A320-25A1555 at any revision,

Or

within 500 FC since last inspection per Airbus SB A320-25A1555 Revision 3, whichever occurs later”

NOTE: Excerpt from Group 1, Zone A/B is used as an example

NOTE: The requested changes are applicable to the following “Threshold” blocks in Table 1:

Group 1, Zone A/B

Group 2, Zone A

Group 2, Zone B

Group 3, Zone A

Group 4, Zone A

4. REF (A) Table 1 – Inspection Threshold - Review and Provide Clarification on Certain Time of Accomplishment Options.

In REF (A) Table 1- Inspection Threshold, the “Threshold” column lists most initial time of accomplishment options, except for that specified in the “Compliance Times” column. The ‘start time’ for most of these options is based on when a previous action was accomplished (for example: previous SB inspections/SB repairs/use of repair drawings). DAL specifically noticed that the “Threshold” blocks for Group 1 Zone A/B and Group 2 Zone B both reference REF (G), twice in independent time of accomplishment options that apply to one group/zone. See example below:

Before exceeding 19 500 flight cycles (FC) since
aeroplane
first flight or **since last repair per Airbus SB**
A320-25A1555 at any revision,
or
within 500 FC since **last inspection per**
Airbus SB A320-25A1555 Revision 3,
whichever occurs later

The red highlighting above shows that for Group 1 Zone A/B, one initial inspection threshold option is based on time since last **repair per any revision** of the subject bulletin. The green highlighting above shows that for Group 1 Zone A/B, one initial inspection threshold option is based on time since last



inspection per **Revision 03** of the subject bulletin. Both options have different flight cycle limits to follow and have different revision specifications that seem to have overlap. DAL believes this is problematic because of the following specific scenario that could be encountered:

*An operator that has exceeded 19,500 FC is in Group 1 Zone A accomplished **inspection and repair** on an aircraft prior to the AD Effective Date per REF (G) **Revision 03**. Per the applicable options for this Group/Zone, two time of accomplishments may apply to this aircraft, whichever occurs later:*

a. Before exceeding 19 500 flight cycles (FC) since aeroplane since last repair per REF (G) at any revision,

or

b. within 500 FC since last inspection per REF (G) Revision 3, whichever occurs later

In this situation, technically Item 1 above would occur later than Item 2, so this would be the applicable threshold option and the next inspection would not be due until 19500 FC after that inspection/repair. However, if only inspection (no repair) per REF (G) **Revision 03** was accomplished, only Item 2 above would apply, and the next inspection would not be due until 500 FC after the initial inspection.

DAL understands that the interpretation above may be as intended, but requests review of these time of accomplishment options for certain Group/Zones, there is overlap (i.e. duplicate SB references) when defining time of accomplishment 'start time', but with different revision specifications. This could be conflicting in nature and could lead to operator confusion.

DAL requests review of and clarification on the time of accomplishment options for Group 1 Zone A/B and Group 2 Zone B, specifically regarding overlap (i.e. duplicate REF (G) references) when defining time of accomplishment 'start time', but with different revision specifications.

5. REF (A) Table 1 –Inspection Threshold - Review and Provide Clarification on Certain Time of Accomplishment Options.

In REF (A) Table 1- Inspection Threshold, the "Threshold" column lists most initial time of accomplishment options, except for that specified in the "Compliance Times" column. As stated in Comment #4, the 'start time' for most of these options is based on when a previous action was completed. In Comment #4, DAL requests clarification on options specifically where there is overlap (i.e. duplicate REF (G) references for one Group/Zone) when defining time of accomplishment 'start time', but with different revision specifications.

In light of that comment, DAL identified that in Group 2 Zone A, the SB in question, REF (G), is only referenced once and specifically calls out Revision 03.

Question:

Is it possible to have a Group 2 Zone A aircraft that may have complied with a previous revision of REF (G)? If this is the case, would that impact the time of accomplishment options?

DAL is requesting this clarification since for Group 1 Zone A/B and Group 2 Zone B, REF (G) is mentioned twice and is not specifically limited to Revision 03 (as specified in Comment #4).



DAL requests review of and clarification on the time of accomplishment options for Group 2 Zone A, specifically regarding acceptable revision levels of REF (G) when defining time of accomplishment 'start time'. Refer to questions below:

- Is it possible to have a Group 2 Zone A aircraft that may have complied with a previous revision of REF (G)?
- If this is the case, would that impact the time of accomplishment options?

EASA response:

Comment 1. agreed. In the Final AD, Credit paragraph (4) has been amended to refer to 'the instructions of Airbus SB A320-25-1BKJ Revision 02' explicitly.

Comment 2. partially agreed. In the Final AD, new Credit paragraph (3) has been added for inspections and corrective actions accomplished in accordance with the instructions of Airbus SB A320-25-1BKJ at Revision 02 or Revision 03 . Paragraph (4) specifically provides Credit for the accomplishment of Airbus SB A320-53-1215 only (without concurrent RI accomplishment) as a corrective action on certain Group 2 aeroplanes previously inspected and corrected in accordance with Airbus SB A320-25-1BKJ Revision 02. This Credit is reflected in Airbus SB A320-25-1BKJ from Revision 03.

Comment 3. agreed. In the Final AD, Table 1 has been amended to better outline the different compliance time options.

Comment 4 noted. The purpose of the SB and the associated AD requirement is to manage the 3 main zones independently. Depending on the accomplishment (or not) of corrective actions, different compliance times apply. No change has been made to the Final AD in response to this comment.

Comment 5 noted. Continuity with previous mandatory requirements is achieved through mandating SB 25-1555 at Revision 3 within a compliance time which is overdue at the present time. No change has been made to the Final AD in response to this comment.

