

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-060

[Published on 17 May 2022 and officially closed for comments on 14 June 2022]

Commenter 1: Sabena Aerospace Engineering – Koenraad De Knibber – 18/05/2022

Comment # 1

SNAE does not agree with §1 Table 1 of the proposed AD.

As mentioned in Table 1, ALI task 531105-01-1 or 531105-01-2, as applicable, which is removed from the AMP after EASA AD 2019-0067R1 is released. EASA AD 2019-0067R1 §(8) allows the cancellation of the ALIs.

The last inspection of the Lateral Cockpit Window Frame Upper Stiffener is done as per EASA AD 2019-0067R1 §(1)-(3) which refers to inspection SB A320-53-1410 R01 (RH side) and SB A320-53-1411 R01 (LH side).

As the inspections are done as per applicable SB and not as per ALI, Table 1 “Initial inspection of affected parts” is not correct.

Also there is no reference for Group 1 and 2. I suppose 890 FC is for group 1 and 3150 FC for group 2.

EASA response: Comment noted.

AD Table 1 provides a threshold for inspection of affected parts which were not previously inspected (if any). Inspections and corrective actions accomplished on affected parts before the effective date of this AD, using the inspection SB at Revision 01, are accepted through sentence “Required as indicated, unless accomplished previously. A Credit paragraph has been added to accept inspections and corrective actions accomplished on affected parts before the effective date of this AD in accordance with SB A320-53-1410 and SB A320-53-1411 at original issue.

The Compliance Time in Table 1 refers to the task previously accomplished, 890 FC apply after accomplishment of ALI task 531105-01-1 or 531105-01-2, as applicable, whereas 3 150 FC apply after accomplishment of ALI task 531105-02-1 or 531105-02-2, as applicable.

No change has been made to the final AD in response to this comment.



Commenter 2: Jetstar Airways – Kevin Chen – 19/05/2022**Comment # 2**

A. Per PAD Para (5), aircraft inspected per ALI 531105 and repaired IAW Airbus approved instructions shall accomplish the next inspections per the RDAS. JST inspections thus far have been per ISB at R00 and have some repairs per RDAS/RDAF. Is EASA able to include the ISB reference in Para (5) as well?

B. In PAD “Reason” paragraph, is EASA able to state that ALI 531105 has been superseded by the ISB?

EASA response:

A. Comment agreed. See also response to comment #1. AD paragraph (5) has been amended to consider repair actions after SB accomplishment.

B. Comment agreed. The reason paragraph has been amended to state that ALI task 531105 has been replaced by the inspection SB.

Commenter 3: American Airlines – Neil Gary – 09/05/2022**Comment # 3**

Due to interpretation differences within the company, American Airlines requests clarification of the next inspection requirement after accomplishment of the modification service bulletins. Ref /B/ EASA AD 2019-0067R1, paragraph (2) clearly states when to inspect the aircraft after the modification bulletins are accomplished, but Ref /A/ EASA PAD 22-060 does not contain a similar paragraph. Instead, the EASA PAD splits the aircraft into two groups: Group 1 is the modified in-service aircraft, and Group 2 is everything else. Table 1 includes the inspection thresholds for both groups, which can lead to some confusion.

AAL currently accomplishes the initial inspection at or prior to the defined threshold and then accomplishes the modifications on the aircraft during the same visit. EASA AD 2019-0067R1, paragraph (2) clearly states to do the next inspection before exceeding 17,300 FC after that modification, and subsequent SDI's not to exceed 3,150 FC thereafter. PAD 22-060 is written in a way that could be interpreted to require the next inspection after that modification to be at 3,150 FC, as the aircraft would move from Group 2 to Group 1 during the modification at the initial inspection completed at the threshold in Table 1.



AAL requests that EASA revise EASA PAD 22-060 to add a statement or paragraph clarifying that after the initial inspection is complete, if the modification is then completed, the operator can accomplish the next inspection at the interval as described in the last two rows of table 1, followed by the repetitive inspections as defined in Table 2, similar to the specific language present in EASA AD 2019-0067R1, paragraph (2).

EASA response:

Comment noted. The content of paragraph (2) of AD 2019-0067R1 is already reflected in Table 1 and Table 2 of the current AD: Table 1 provides the threshold for the first inspection in accordance with the inspection SB at Revision 1, which is due before exceeding 17 300 FC since accomplishment of SB Airbus SB A320-53-1337 or A320-53-1338. An aeroplane having those mods embodied in service is Group 1, therefore the interval of 3 150 FC applies. The interval cannot be applied before the initial threshold inspection. No change has been made to the final AD in response to this comment.

Commenter 4: Delta Air Lines – James Thompson – 14/06/2022

Comment #4

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-060, dated 17 May 2022.
- (B) Airbus Service Bulletin (SB) A320-53-1410 original issue dated 05 June 2018 or Revision 01 dated 26 January 2022.
- (C) Airbus Service Bulletin (SB) A320-53-1411 original issue dated 05 June 2018 or Revision 01 dated 26 January 2022.
- (D) Airbus SB A320-53-1338 original issue dated 05 June 2018, or Revision 01 dated 24 June 2020.
- (E) Airbus SB A320-53-1337 original issue dated 05 June 2018, or Revision 01 dated 24 June 2020.
- (F) ALS Part 2 Rev 9 dated 02 Feb 2022.
- (G) EASA AD 2019-0067R1 dated 11 Sep 2022.
- (H) Airbus SB A320-53-1335 original issue dated 12 March 2019.
- (I) Airbus SB A320-53-1336 original issue dated 12 March 2019.

1. Commenter Request

Modify Ref (A) PAD to allow operators to take credit for the initial and repetitive inspection required by paras (1)-(4) by completing ref (B) and (C) SBs (Rev original) prior to the AD effective date.

Request justification



As the Ref (A) PAD is currently written the use of Rev 1 of Ref (B) and (C) SBs is now required, while the superseded AD Ref (G) allowed use of rev original. However, no credit allowance is given for accomplishment of the required inspections if they were completed using of the Ref (B) and (C) rev original ISBs. Without this allowance aircraft that complied with the prior EASA AD, Ref (G), that have completed this inspection may instantly overrun the proposed AD limits should it be beyond the other allowed thresholds.

Example: An A320 aircraft that has accumulated more than 21100 TFC, has accumulated more than 3150 FC since the last applicable ALI accomplishment, did not have fallout at the last inspection and therefore did not accomplish Ref (D), (E), (H) or (I) SBs would instantly overrun the proposed AD limits regardless of the last inspection under the rev original ISBs Ref (B) and (C).

List paragraphs that change; describe (nonobvious) changes

- Create a “Credit” section similar to below:
- Inspections and corrective actions of affected parts, accomplished on an aeroplane before the effective date of this AD in accordance with the instructions of Rev orig of the applicable ISB are acceptable to comply with the requirements of para (1) of this AD for that aeroplane.

2. Commenter Request

Please provide clarification or revise note 1 of ref (A) based on the justification below.

Request justification

Note 1 of Ref (A) states that ALI 531105 has been deleted from ALS Part 2 and that the previous allowance in Ref (G) to cancel this ALI task has been removed as it is no longer required. ALI 531105-01-1 / -01-2 / -02-1 have been deleted but ALI 531105-02-02 is still active under Ref (F). The current ALI 531105-02-02 appears to only be applicable to the NEO fleets which are not included in the applicability of Ref (A). Is the intent that the ALI task remains active and applicable to NEO fleets however the requirements of this AD replace the ALI task for fleets included in its applicability? If so, please revise note 1 to indicate that 531105-02-02 is still active but not applicable to fleets affected by Ref (A).

List paragraphs that change; describe (nonobvious) changes

- If the assumption above is correct, rewrite Note 1 to be similar to below:
- Accomplishment of inspections and corrective actions on an aeroplane, as applicable and as required by this AD, previously allowed cancellation of ALI task 531105 from the approved Aircraft Maintenance Program, on the basis of which the operator or the owner ensures the continuing airworthiness of that aeroplane. ALI Tasks 531105-01-1 / -01-2 / -02-1 have been deleted and ALI task 531105-02-02 is now only applicable to fleets A319-PAX-NEO, A320-PAX-NEO and A321-NEO which are not included in the applicability of this AD. The status of these ALI task from ALS Part 2 Dated 02 Feb 22.

EASA response:

Commenter Request 1: See EASA response to comment #1 and #2.



Commenter Request 2: Comment noted. The purpose of this AD is to address the CEO fleet only. All task 531105-02-02 remains valid for the NEO fleet based on the age of the fleet. Note 1 of the AD has been amended to clarify the situation for NEO aeroplanes.

