

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-098

[Published on 22 July 2022 and officially closed for comments on 19 August 2022]

Commenter 1: All Nippon Airways – Takeshi Onuki – 25 July 2022

Comment # 1

===References===

REF/A/ EASA PAD No. 22-098 "ATA 28 - Fuel - Engine Low Pressure Shut Off Valve Electrical Harness Routing - Modification"

REF/B/ Airbus Service Bulletin A320-92-1144 (Attached)

REF/C/ Airbus Service Bulletin A320-92-1145 (Attached)

===Description===

ANA has reviewed REF/A/ PAD, and would like to comment on the compliance time and point out one error.

ANA requests EASA to reconsider the wording in the coming AD based on our comments.

===ANA's comment and request===

(1) Please secure the work period for at least 3 years from the issuance of AD on all aircrafts.

*****Existing PAD No.22-098*****

Before Exceeding 7 years since aeroplane date of manufacture, modify the routing of the LPSOV electrical harness in accordance with the instructions of the SB.

*****ANA's request*****

Of our aircrafts in SB target, the older ones were manufactured in November 2016.

So there is only about one year left by the compliance time, and there are no plans for C-check maintenance during that period.



Considering the required manpower and content of modification work, we believe it should be done in C-check maintenance instead of overnight, so at least 3 years from the issuance of AD should be secured on all aircraft as a period for planning C-check maintenance.

In addition, the safety risk behind this SB does not increase with the age of the aircraft, but the risk is related to an Uncontained Engine Rotor Failure (UERF), so this modification is necessary to be carried out in an organized way equally on all targeted aircrafts.

Therefore, please secure the work period for at least 3 years from the issuance of AD on all aircrafts.

(2) Please correct the SB target engines below in the coming AD.

*****Existing PAD No.22-098*****

A320-92-1144 (for MSN with CFM International LEAP-1A series engines)

A320-92-1145 (for MSN with International Aero Engines PW1100 series engines)

*****ANA's request*****

Please correct as follows:

A320-92-1144 (for MSN with International Aero Engines PW1100 series engines)

A320-92-1145 (for MSN with CFM International LEAP-1A series engines)

EASA response:

Comment (1) partially agreed. The initial compliance time has been modified to add a compliance time counted from the AD effective date. In the final AD, the compliance time will be twofold: The required modifications will have to be performed 'Before exceeding 7 years since aeroplane date of manufacture', or 'within 12 months after the effective date of this AD', whichever occurs later.

Comment (2) noted. EASA confirm that the PAD issued on 22 July 2022 mentions the correct SB references. No further change required for the final AD.



Commenter 2: American Airlines – Garrett E. Long – 04 August 2022**Comment # 2**

American Airlines respectfully request the following changes to EASA PAD 22-098. Please see the following changes:

“The definitions in EASA PAD 22-098 need to be corrected as the Airbus Service Bulletin A320-92-1144 is for MSN with International Aero Engines PW1100 series engines and SB A320-92-1145 is for MSN with CFM International LEAP-1A series engines. Additionally, there are several errors in the accomplishment instructions of SB A320-92-1145 original issue dated 17 May 2022 that make it unusable. A new SB revision is required before this PAD becomes an Airworthiness Directive.”

EASA response:

Comment (SB references) noted. EASA confirm that the PAD issued on 22 July 2022 mentions the correct SB references. No further change required for the final AD.

Comment (SB instructions) agreed. The final AD wording has been amended to give some flexibility to operators to apply/accomplish other Airbus approved instructions in lieu of the SBs.

As a general principle, EASA encourage operators to submit any SB related comments to Airbus directly.

