

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-127

[Published on 22 September 2022 and officially closed for comments on 20 October 2022]

Commenter 1: Delta Air Lines – Stephen Hill – 18/10/2022

Comment # 1

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 22-127, dated 22 Sep 22
- (B) Airbus Service Bulletin (SB) A320-92-1087 R04, dated 16 May 22
- (C) Airbus Service Bulletin (SB) A320-92-1119 R02, dated 16 May 22

Commenter Request

REF (A) “Definitions” includes an explanation of the term, “The SB”. Delta requests:

- (1) Revision of the term from “The SB” to “The Applicable SB” as there is more than one SB detailed in the definition.
- (2) Revision of the related definition to specify “or” instead of “and” when as only one of the two SB options is applicable.

Request justification

REF (A) defines the term “The SB” as follows:

“The SB: Airbus Service Bulletin (SB) A320-92-1087 Revision 04 for aeroplanes that do not have Airbus mod 35869 embodied in production, and SB A320-92-1119 Revision 02 for aeroplanes that have Airbus mod 35869 embodied in production, as applicable.”

As indicated above, the bulletin that operators accomplish where the EASA PAD mentions “The SB” is dependent on status of production mod 35869. Operators whose aircraft do not have this mod embodied are subject to REF (B) instructions, where operators that have had this mod embodied should accomplish REF (C) instructions. Each of these SBs in the “The SB” definition specifies that there are no concurrent requirements that should be considered and neither SB mentions the other. Outside of mentioning a pre-/post- modification status when defining SBs, the definition title and verbiage don’t clearly indicate that operators should use one SB (not both).



List paragraphs that change; describe (nonobvious) changes**Definitions:**

- Revise the term/definition given for “The SB” as follows:
“The Applicable SB: Airbus Service Bulletin (SB) A320-92-1087 Revision 04 for aeroplanes that do not have Airbus mod 35869 embodied in production, and OR SB A320-92-1119 Revision 02 for aeroplanes that have Airbus mod 35869 embodied in production, as applicable.”
-AND-
- Revise “The SB” references in Paras (1), (2), (3), and (5) to state “The Applicable SB” instead.

EASA response:

Comment partially agreed. In the SB definition, the word ‘AND’ will be replaced by ‘OR’ to clarify that only one of the SBs must be used for each individual aeroplane, depending on whether Airbus mod 35869 is embodied or not. ‘As applicable’ is present in the definition and will not be added to the definition term in order to keep the AD text as concise as possible.

Commenter 2: United Air Lines – Joshua Hooks – 19/10/2022**Comment # 2**

SB A320-92-1087, Rev. 04 contains “If removed, ...” language for testing of components that may or may not be installed in Task A320-A-92-XX-1087-02001-390A-A which is required for compliance upon inspection findings. The same task in SB A320-92-1119, Rev. 02 is Task A320-A-92-XX-1119-01001-320A-A which is also required for compliance upon inspection findings and does not contain “If removed, ...” language. Due to varying configurations of A/C, UAL believes that the “If removed...” language should also apply to Task A320-A-92-XX-1119-01001-320A-A in SB A320-92-1119 Rev. 02. Due to this fact, UAL requests that Note 1 of EASA AD 2018-0131 be included in the final rulemaking.

EASA response:

Comment agreed. The Note has been added to the final AD.

