

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-128

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

Commenter 1: Emirates – Amr Mahmoud – 03/10/2022

Comment # 1

The affected part of the subject PAD is Motoreductor units, having Part Number (P/N) 4255417, or P/N 4394656, or P/N 4339747, however, this PN is not mentioned in the IPC/AMM nor in Airbus Service Bulletin (SB) A320-52-1202.

Therefore, please advise how compliance to requirements of paragraph (1) can be demonstrated.

EASA response:

Comment noted. If Airbus airstairs are installed on an aeroplane, one of the affected motoreductor P/N is also installed. No change has been made to the final AD in response to this comment.

Commenter 2: All Nippon Airways – Akihisa Fujiwara – 03/10/2022

Comment # 2

1. Please add Mod number in applicability

All A318, A319, A320 and A321 are applicable to this AD. However it is preferred to add the Mod number which is written in Note column, page 2.

Because the aircraft which has not embodied these Mods does not install on-board airstairs.

2. Please delete Group 2

Group 2 defines that "aeroplanes are those that are not equipped with on-board entrance stairs." We believe we could not install on-board airstair as long as we embody the Mod which shows in Note. Therefore we believe it is not necessary to add Group 2 in this AD.

EASA response:

- 1. Comment not agreed. Airstairs can be installed on an aeroplane at any time during its life. The AD Applicability therefore lists all models eligible to install airstairs. No change has been made to the final AD further to this comment.**
- 2. Comment not agreed. Group 2 is necessary to define the part installation requirement of paragraph (2) for possible future airstairs installations. No change has been made to the final AD further to this comment.**

Commenter 3: American Airlines – Garrett E. Long – 14/10/2022**Comment # 3**

American Airlines (AAL) reviewed EASA PAD 22-128, and would like to make a comment on the Applicability paragraph:

EASA is proposing an AD that is applicable to Airbus A318-112, A319-115, A319-132, A319-133, A319-151N, A319-153N, A319-171N, A320-211, A320-212, A320-214, A320-231, A320-232, A320-251N, A320-252N, A320-253N, A320-271N, A320-272N, A320-273N, A321-112 model aircraft, all MSNs. However, AAL notes that the required actions are only necessary if the aircraft is equipped with on-board entrance stairs. AAL does not have on-board entrance stairs on our fleet, and would require a major modification to the aircraft in order to install the stairs on our fleet. AAL did notice the Note in the Definitions that identifies Airbus production modifications (MODs) that install these stairs. AAL interprets the safety issue being raised in this proposed AD revolves around the motored units with MPNs 4255417, 4394656, or 4339747, which AAL infers are components of the stair units.

Seeing that the entirety of the global fleet is identified in the PAD, AAL proposes that EASA adjusts the Applicability paragraph as follows:

Airbus A318-112, A319-115, A319-132, A319-133, A319-151N, A319-153N, A319-171N, A320-211, A320-212, A320-214, A320-231, A320-232, A320-251N, A320-252N, A320-253N, A320-271N, A320-272N, A320-273N, A321-112 aeroplanes, all manufacturer serial numbers, with motored units, having Part Number (P/N) 4255417, or P/N 4394656, or P/N 4339747, installed on on-board entrance stairs.

If EASA does not find the above proposed verbiage acceptable, AAL would like to propose an alternate adjustment to the Applicability paragraph:

Airbus A318-112, A319-115, A319-132, A319-133, A319-151N, A319-153N, A319-171N, A320-211, A320-212, A320-214, A320-231, A320-232, A320-251N, A320-252N, A320-253N, A320-271N, A320-272N, A320-273N, A321-112 aeroplanes, all manufacturer serial numbers, with Airbus modifications (mod) 20062, 23288, 23398, 150150, 162481, 167541 or 168615, as applicable, embodied in production or embodiment of equivalent Airbus Service Bulletins embodied in service.

EASA response:

See answer to Commenter #2 above. No change has been made to the final AD further to this comment.

