

COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-161

[Published on 23 November 2022 and officially closed for comments on 21 December 2022]

Commenter 1: SWISS International Air Lines Ltd. – Markus Baumann – 20/12/2022

Comment # 1

The A320Fam ALS Part 2 Variation 9.2 contains three new ALI Tasks that are strongly affecting the SWR A320Fam fleet (531153-04-1 [all]; 531155-04-1 [all] & 534189-02-1[A321 only]). All three tasks receive a given compliance time of 12 months only, instead of the usually granted 24 months.

The biggest issue we have is that the inspections require a significant amount of access granting. This, in combination with the current uncertainty of what findings are to be expected, leaves a too big risk for us to perform the tasks at our Line station ZRH during special ground times. A/C that do not have a planned base maintenance ground time until 01 November 2023 need to be taken out of the high peak summer operation to have these new ALI tasks performed. This is very inefficient and time consuming and results in a high financial burden.

SWR has reacted very quickly in implementing the new tasks and the first affected aircraft that had a base maintenance event already planned will undergo the inspections these days. SWR is willing to share the finding experiences that will be made from these inspections with Airbus and EASA in order to support possible extensions of the compliance time, at least on some of our affected MSNs.

PAD 22-161 Feedback request:

Swiss Int. Air Lines Ltd. kindly asks EASA to consider an adjusted compliance time of 16 months (01 March 2024), in order to give the operators enough time to stagger the inspections within regularly planned base maintenance ground times, also reaching the winter maintenance season 2023/2024.

EASA response: Comment not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter. For an aircraft registered in an EASA Member State, the NAA can grant individual (temporary) exemptions on AD compliance time. No changes have been made to the Final AD in response to this comment.

Commenter 2: Austrian Airlines AG – Martin Pfannhauser – 20/12/2022

Comment # 2

EASA issued AD 2022-0085, to require accomplishment of all maintenance tasks as described in Airbus ALS Part 2 at Revision 09 for A320 Family.

Airbus recently released ALS Part 2 Damage Tolerant Airworthiness Limitation Variation at Revision 9 Variation 9.2 which will be mandated by PAD 22-161.

Concerning compliance time of the different tasks in the variation, note 1 of the PAD states: “For the purpose of this AD, the thresholds and intervals as defined in the ‘Compliance Time’ pages of the Variation include specific compliance times for certain tasks.”

For certain tasks this compliance time is only 12 months from the date of the issuing of the variation.

The actual proposed compliance time of 12 months will have a significant effect on flight operations as additional ground times for subject inspections are required, also during high season resulting in an overall big economic impact.

Austrian Airlines part of Lufthansa Group kindly asks for an extension of the compliance time to 24 months which would cope with existing ground times of typical heavy maintenance schedule.

Subject inspection was already performed on three aircraft at Austrian Airlines without any finding.

EASA response: see response to comment #1

Commenter 3: Edelweiss Air AG – Beat Ritzmann – 21/12/2022

Comment # 3

EASA issued AD 2022-0085 to require accomplishment of all maintenance tasks as described in Airbus ALS Part 2 at Revision 09 for A320 Family.

Airbus recently released ALS Part 2 Damage Tolerant Airworthiness Limitation Variation 9.2 to Revision 9 which will be made mandatory after the consultation round launched by PAD 22-161.



Concerning compliance time of the different tasks in the variation, Note 1 of the PAD states: “For the purpose of this AD, the thresholds and intervals as defined in the ‘Compliance Time’ pages of the Variation include specific compliance times for certain tasks.”

For certain tasks this compliance time is only 12 months from the date of the issuing of the variation.

This actual proposed compliance time of 12 months will have a significant effect on flight operations as additional ground times for subject inspections are required, also during high season resulting in an overall significant economic impact (flight cancellation).

Edelweiss Air, as part of Lufthansa Group, kindly asks for an extension of the compliance time for these tasks additional 4 months (12 + 4 months) which brings us to the next winter ground time season.

On certain aircraft, subject inspection was already performed on four aircraft without any findings.

EASA response: see response to comment #1

Commenter 4: Lufthansa CityLine GmbH – Michael Bächle – 21/12/2022

Comment # 4

EASA issued AD 2022-0085 to require accomplishment of all maintenance tasks as described in Airbus ALS Part 2 at Revision 09 for the A320 Family. Airbus recently released ALS Part 2 Damage Tolerant Airworthiness Limitation Variation 9.2 to Revision 9 which will be made mandatory after the consultation round launched by PAD 22-161.

Concerning compliance time of the different tasks in the variation, Note 1 of the PAD states: “For the purpose of this AD, the thresholds and intervals as defined in the ‘Compliance Time’ pages of the Variation include specific compliance times for certain tasks.”

For certain tasks this compliance time is only 12 months from the variation’s issue date.

This actual proposed compliance time of 12 months will have a significant effect on flight operations as additional ground times for subject inspections are required, also during high season resulting in an overall big economic impact.

Lufthansa CityLine, as part of Lufthansa Group, kindly asks for an extension of the compliance time for these tasks to 24 months which would cope with existing ground times of typical heavy maintenance schedule.

On certain aircraft, subject inspection is already in progress: on two aircraft without any finding so far.



EASA response: see response to comment #1

Commenter 5: Brussels Airlines (BEL) – Lode Vanderbeken – 21/12/2022

Comment # 5

EASA issued AD 2022-0085, to require accomplishment of all maintenance tasks as described in Airbus ALS Part 2 at Revision 09 for A320 Family.

Airbus recently released ALS Part 2 Damage Tolerant Airworthiness Limitation Variation 9.2 to Revision 9 which will be made mandatory after the consultation round launched by PAD 22-161.

Concerning compliance time of the different tasks in the variation, Note 1 of the PAD states:

“For the purpose of this AD, the thresholds and intervals as defined in the ‘Compliance Time’ pages of the Variation include specific compliance times for certain tasks.”

For certain tasks this compliance time is only 12 months from the date of the issuing of the variation.

This actual proposed compliance time of 12 months will have a significant effect on flight operations as on 11 aircraft additional ground times for subject inspections are required, also during high season resulting in an overall big economic impact.

As BEL does not have the capability to perform the task, slots have to be found at MRO's, as well additional ferry flights are to be made.

BEL, as part of Lufthansa Group, kindly asks for an extension of the compliance time for these tasks to 24 months which would cope with existing ground times of typical heavy maintenance schedule.

EASA response: see response to comment #1

