

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 22-169R1

[Published on 15 December 2022 and officially closed for comments on 10 January 2023]

### Commenter 1: Hainan Airlines – Abraham Zhang Zhen – 05/01/2023

#### Comment # 1

Hainan Airlines found a discrepancy regarding the affected Galleys Effectivity Scope between Table 5 – Affected Galleys 5 of PAD and Safran VSB 601800-25-030 Rev.NC (which is included in SB A320-25-1BK9 rev. 03).

For example: Hainan Airlines has the affected Stowage S51 (P/N: 601927-000001). EASA PAD Table 5 shows the part number 601927-000001 Effectivity Scope is all s/n. But in Safran VSB 601800-25-030 Rev.NC, the P/N 601927-000001 s/n scope are 001 – 055.

EASA PAD Para. (4) requires airlines must modify and re-identify each affected galley on an aeroplane in accordance with the instructions of the SB2. But the affected Stowage (part number 601927-000001) Effectivity Scope are different between AD and SB, which leads confusion to airlines.

Please EASA review this discrepancy and revise the PAD so that the Table 5 Affected Galleys Effectivity Scope are identical with SB2 (Safran VSB 601800-25-030 Rev.NC).

#### EASA response:

**Comment not agreed. EASA consider the AD and the VSB wordings equivalent. As the design deficiency has been confirmed affecting all s/n of this particular Galley part number, identifying exhaustively the group of s/n rather than 'all' does not bring any added value. Should more than 55 units have been produced, EASA confirm that the AD wording prevails.**

**No changes have been made to the Final AD in response to this comment.**

**Commenter 2: Hainan Airlines – Abraham Zhang Zhen – 06/01/2023****Comment # 2**

- A. Hainan Airlines Group now has 190 aeroplanes (A319, A320 and A321 fleet). If the affected Galleys are verified according to AIR, the workload is too large, and Hainan Airlines thinks it is unnecessary, because Hainan Airlines has fully implemented and complied with the compliance deadline of AD issued by EASA every time. Therefore, it is more reasonable to judge whether it is applicable to this AD according to whether the affected galley part number is installed on the current aircraft (according to Airbus IPC). Hainan Airlines recommends to delete the words “or if equipped with a galley that has been identified as an affected galley (Part Number and/or serial number, as applicable) in the Aircraft Inspection Report (AIR)” in Applicability Paragraph of subject PAD.
- B. The requirements of paragraph (5) of PAD are not clear. For example, some of HNA aircraft's AIRs have the affected part numbers in Table 1 and Table 2, and SB1 has been accomplished according to the requirements of AD 2018-0255, which becomes the affected part numbers in Table 3. However, since the modification deadline required in paragraph (3) has not yet been reached, these affected galleys should be the cases mentioned in paragraph (5). But Hainan Airlines doesn't think it is necessary to contact the galley manufacturer for further instructions in this case, just follow the requirements of paragraph (3). Could EASA please provide an example to clear this Paragraph Requirements?

**EASA response:**

- A. Comment not agreed. This AD requires actions on those Galleys which have been modified in service by non-Airbus modification, and that have been re-identified with a different P/N and/or s/n, which makes them outside the scope of the mandated modifications. Referencing the original P/N, as listed in the AIR, is the only method to include aeroplanes equipped with those galleys in the Applicability of the AD.**
- B. Comment not agreed. The applicability of paragraph (5) of the AD is dual and therefore exclude any galley already affected by the previous paragraphs:**
- aeroplanes equipped with a galley having a P/N and/or a s/n, as applicable, which is different from the one identified in the AIR
  - and which has not been modified as required by paragraphs (1) to (4) of this AD
- Referring to the commenter's example above, paragraph (3) is now applicable. After complying with that paragraph's requirements, the galley will be “modified as required by paragraphs (1) to (4) of this AD” and consequently paragraph (5) would no longer be applicable.**

**No changes have been made to the Final AD in response to this comment.**

