

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-035

[Published on 16 March 2023 and officially closed for comments on 13 April 2023]

**Commenter 1: Virgin Atlantic – Martyna Snopek – 29/03/2023**

### Comment # 1

1. The due date of 6 months after the AD release will have a significant operational impact, especially during the summer flying in case of any findings. The airline community would strongly advise EASA to review the threshold with a view of extending it.
2. The elapsed time listed in the SB 25-P208 is 2.25h. This assumes 10 people working - this is highly unrealistic. 2.25 hours elapsed is more likely to be per lav, i.e., the accomplishment of the SB realistically requires a full day input. Please note achieving this in the stipulated 6-month timeframe will lead to significant impact on the summer flying.
3. In relation to the comments above, VIR request that the Airbus SB allows partial accomplishment, i.e., a statement to permit lavatories to be inspected at separate inputs.
4. There is a potential for damage to the NTF while gaining access to the fittings; VIR believes the associated NTF replacement costs should be covered. The replacement of NTF also requires curing times which increase the required ground time.
5. VIR would like a confirmation that the fitting replacement can be accomplished on-wing without the need for lavatory removal.

### EASA response:

**Comment #1.1. Comment not agreed. The risk assessment does not support an extension of the compliance time as requested by the commenter.**

**Comments #1.2, #1.4 and #1.5. Comments noted: We recommend the commenter to approach Airbus directly on these commercial matters.**

**Comment #1.3. Given the repetitive inspection and reporting requirements it is not allowed to stagger lavatories inspections.**

**No changes have been made to the Final AD in response to these comments.**



**Commenter 2: Delta Air Lines – Cecilia Teeuwen – 14/04/2023****Comment # 2****Commenter Request**

Clarification references for Inspection Procedures

**Request justification**

Per SB Ref(B), General Visual Inspection Task A350-A-25-XX-P208-01001-311A-A (A350-A-25-XX-P208-01ZZZ-311Z-A), the instructions refer to MP A350-A-25-41-XX-01ZZZ-310Z-A to accomplish the GVI. When searched in AirbusWorld, the task for inspection of all lavatory attachment is A350-A-25-41-XX-01001-310A-A.

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

Coordinate with Airbus the TC Holder for revision of the SB Ref (B) to reference the MP task that is available.

***EASA response:***

***Comment noted: We recommend the commenter to approach Airbus directly in regard to any clarification on the syntax of the tasks referred to in the SB.***

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

