

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-029

[Published on 01 March 2023 and officially closed for comments on 29 March 2023]

Commenter 1: Singapore Airlines Limited – Kian Ann Soh – 02/03/2023

Comment # 1

1. For this PAD, is it allowed to identify affected part by reviewing maintenance records?
2. AOT A35N017-22 Rev 02, under “AIRCRAFT AFFECTED”, it is mentioned that Aircraft with Lavatories equipped with unregulated decentralized gaseous oxygen containers (SafeLAV) having Part Numbers and Serial Numbers as provided in Reference 3. However, PAD does not clearly specify the location at which the affected part can be installed. This may cause unnecessary maintenance action to be taken to identify the affected part in the whole aircraft including the passenger seats, instead of just the affected lavatory area.

1. AIRCRAFT AFFECTED

BEG. REV

All A320 family aircraft, with Lavatories equipped with unregulated decentralized gaseous oxygen containers (SafeLAV) having Part Numbers and Serial Numbers as provided in **Reference 3**.

END REV

EASA response:

1 – Comment agreed. The Final AD requires replacement of affected parts which necessarily implies to identify them in a first stage. As the identification is not part of the AD requirements, any method providing reliable identification is deemed acceptable. To support operators, Note 1 was added into the Final AD to specify that a review of maintenance records is also acceptable (in lieu of the physical inspection) to identify the installed SLGOC P/N and s/n, provided those records can be relied upon for that purpose, and the P/N and s/n of the installed SLGOC can be conclusively identified from that review.

2 – Comment agreed. the Final AD includes the FIN locations where the affected parts are installed.

Commenter 2: All Nippon Airways(ANA) Co., Ltd – Daisuke Yamamoto – 03/03/2023 and 07/03/2023



Comment # 2

The number of affected parts listed in the PAD Appendix 1 is fewer than Collins SIL D1379-35-070 rev.01 referenced by AOT A35N017-22 revision 02. Please see attached file for the difference between PAD Appendix and VSIL list.

Please clarify and describe in AD “Reason” paragraph, why there is a difference between PAD Appendix and VSIL list. If it is an error, please correct the PAD Appendix 1 list.



(Revised)Difference
between PAD Apdx a

EASA response:

Comment not agreed. Collins SIL D1379-35-070 rev.01 provides list of SafeLav gaseous oxygen container P/Ns and s/n’s, including those embodied in A350 aeroplanes, whereas this AD is applicable only to A318, A319, A320, A321, A330, and A340 aeroplanes and therefore lists only parts installed in these aeroplanes. We have amended to correct errors and reflect Collins SIL D1379-35-070 rev.01.

No changes have been made to the Final AD in response to this comment’, however, referring to Collins SIL D1379-35-070 rev.01, the Appendix 1 of the Final AD has been corrected as P/N / s/n were omitted in the consulted version.

Commenter 3: Air New Zealand – Alex Alvarez – 07/03/2023

Comment # 3

The PAD is easy to read and clear. It’s simple, but contains all the information that the Operator needs to process and show that it is complying.

Although, ANZ would like to suggest adding the following note to the AD:

“AA review of aircraft maintenance records is acceptable to determine the P/N and S/N of the oxygen cylinders installed, provided that the P/N and S/N of the oxygen cylinders installed can be determined from this review.”

EASA response:

Comment agreed. Please refer to EASA response to Commenter #1.



Commenter 4: Türk Hava Yolları Teknik A.Ş. – Kasim Burak Çevik – 07/03/2023**Comment # 4**

According to EASA PAD 23-029 “Required actions” statements are directly related to the AOTs (AOT A35N017-22, AOT A35L018-22) Revision 2. AOTs refer to Collins Aerospace VSIL Ref: D1379-35-070 for applicability. There are PN/SNs differences between EASA PAD No 23-029 and SIL D1379-35-070. The differences listed below.

PN	SN	SIL D1379-35-070	EASA PAD No 23-029	AOT A35N017-22 REV 00 and AOT A35L018-22 REV 00
22G150150460400	A927C9009	Exist	Does not exist	Exist
22G150150460400	A927C9009	Does not exist	Exist	Does not exist
22G220150460400	A9FDA8001	Exist	Exist	Does not exist
H2G1505Q0700501	4 EA different SN	Exist	PN does not exist	PN does not exist
H2G2205Q0700501	78 EA different SN	Exist	PN does not exist	PN does not exist

According to SIL D1379-35-070, there are affected SNs for PN: H2G1505Q0700501 and PN: H2G2205Q0700501.

From PN/SN list in SIL D1379-35-070, there are affected PN/SNs installed on A350 fleet. However, there is no required action specified in EASA PAD 23-029 for A350 aircrafts.

Could you please share EASA’s evaluation about the differences between EASA PAD 23-029 and SIL D1379-35-070?

Could you please share EASA’s evaluation about replacement of affected part installed on A350 fleet?

EASA response:

Comment partially agreed. For A350 aspect, please refer to EASA response to Comment #2.

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

For the SafeLav gaseous oxygen containers P/N 22G150150460400 and P/N 22G220150460400 omissions:

P/N 22G150150460400 having s/n A927C9009 was added into list of Appendix 1 applicable to 22G15-0400 Series SafeLav gaseous oxygen container.

P/N 22G220150460400 having s/n A9FDA8001 was added into list of Appendix 1 applicable to 22G22-0400 Series SafeLav gaseous oxygen container.

Changes have been made to the Final AD in response to this comment.



Commenter 5: Brussels Airlines – Dirk Biesen – 09/03/2023**Comment # 5**

In AOTs A35N017-22 and A35L018-22 there is reference to VSIL D1379-35-070 for the affected PN/SN's. We have loaded all the PN's and SN's mentioned in the VSIL in our system. In the PAD there is an appendix, and nothing is mentioned about the VSIL. What is the reason?

EASA response:**Comment noted.**

Collins SIL D1379-35-070 rev.01 lists the affected P/N and s/n irrespective to the product on which they are embodied. The applicability of the Final AD has not the same perimeter as the Collins SIL and therefore P/N and s/n listed in the Final AD Appendix are reduced compared to the Collins SIL. . This does to prevent referring to Collins SIL D1379-35-070 rev.01 through the accomplishment of Airbus AOTs A35N017-22 and A35L018-22.

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

Commenter 6: Spring Airlines – Zheng Chang chang – 16/03/2023**Comment # 6**

Emergency Oxygen Container Assembly (PN:22G150150460400 SN:A9FD36002) is not listed in Collins Aerospace VSIL D1379-35-070 R1. It should be revised to (PN:22G150150460400 SN:A927C9009). And there are two same items (PN: 22G220150460400 SN: A9FCFC007) in PAD 23-029. One of the same items should be revised to (PN: 22G220150460400 SN: A9FDA8001).

22G150150460400 A9FD36002 - This S/N should be revised to A927C9009.

22G220150460400 A9FCFC007 - This S/N should be revised to A9FDA8001.

EASA response:**Comment agreed.**

Please refer to EASA response to Comment #4.



Commenter 7: Delta Air Lines – Alexandra Kidd – 29/03/2023**Comment # 7**

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 23-029, dated 01 March 2023

(B) Collins Service Information Letter (SIL) D1379-35-070 Rev.01, dated 07 Dec 2022

Comment #1Commenter Request

Revise PAD Ref /A/ to correct errors under Appendix 1 (List of affected parts (P/N and S/N)), page 7 list related to “22G22-0400 Series”, related to affected SafeLav Gaseous Oxygen Container S/N as referenced in Collins SIL Ref /B/.

Request justification

EASA PAD Ref /A/ duplicated an affected SafeLav Gaseous Oxygen Container S/N, P/N 22G220150460400 S/N A9FCFC007 within Appendix 1 (List of affected parts (P/N and S/N)), page 7.

According to the information provided in the Collins SIL Ref /B/, the next S/N to be listed should be P/N 22G220150460400 S/N A9FDA8001.

List paragraphs that change; describe (nonobvious) changes

- Appendix 1.

Comment #2Commenter Request

Revised Ref /A/ to add clarification on why the affected P/Ns and S/Ns listed within Ref /A/ Appendix 1 contain fewer P/N and S/Ns in comparison to the ones listed within the Collins SIL Ref /B/.

Request justification

To comply with the PAD Ref /A/ Alert Operators Transmissions (AOT) A35L018-22 Rev 01 and A35N017-22 Rev 01 should be implemented. These AOTs requires the Collins SIL Ref /B/.

Therefore, clarification is needed to address the compliance requirements of Ref /A/ paragraph (1) Replacement.

List paragraphs that change; describe (nonobvious) changes

- Appendix 1



OR

- Ref /A/ “Definition:” paragraph

EASA response:

Comment 1:

Comment agreed. Please refer to EASA response to Comment #4

Changes have been made to the Final AD in response to this comment.

Comment 2:

Comment not agreed. Please refer to EASA response to Comment #2 (and eventually Comment #5)

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

