

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-058

[Published on 23 May 2023 and officially closed for comments on 20 June 2023]

Commenter 1: Avianca Cargo – Carlos Eduardo Motta S. – 31/05/2023

Comment # 1

Comment A: In paragraph (3) we propose to include as follows:

"If, during any inspection as required by paragraph (1) or (2) of this AD, as applicable, any crack **OR DAMAGE** is found, before next flight, accomplish the applicable corrective action(s) in accordance with the instructions of the SB, or contact Airbus for approved corrective action instructions and accomplish those instructions accordingly."

Justification: Damages other than cracks, like elongated holes, can be found in the area that led to a repair that requires a RDAF after contacting AIRBUS.

Comment B:

For paragraph (11) and (12) we propose the following additional note:

Note: Partial embodiment of RI R53112926 as referenced in paragraph (11) and (12) constitutes terminating action for the specific area (frame) only. The areas (frames) that were not repaired, require the accomplishment of repetitive inspections as specified in paragraph (1).

Justification: Please consider that RI R53112926 can be performed partially, for example only on FR16 RHS junction, and, therefore, for that FR only, the performed repair constitutes a terminating action for the FR16 RHS junction only. Please adjust those paragraphs to allow partial embodiment as terminating action for the specific area.

EASA response:

Comment A: Comment agreed. Paragraph (3) was adapted accordingly in the Final AD.

Comment B: Comment agreed. Note 2 has been added to the Final AD.



Commenter 2: Delta Air Lines, Inc. – James Thompson – 19/06/2023**Comment # 2****Comment A:**

Request: Modify Para (1), Table 2, Option C to allow airlines to align the required SDI with the C-Check schedule (up to 36 months).

Request justification: Option C of Table 2 requires an SDI for Group 2 A/C to be accomplished within 2 years after effective date of the AD. Time intervals between C-Checks for an A/C may exceed 2 years. Accomplishment of the SDI should be update to allow enough time in order to align with C-Check.

List paragraphs that change; describe (nonobvious changes): Para. (1) Option C of Table 2: Change requirement from “Within 24 months” to “Within 36 months”.

Comment B:

Request: Provide clarification to para. (10) Note 1.

Request justification: DAL has noted that the wording in the RDAS/RDAFs provided for the repair of affected areas that were inspected per ALI 531110 varies slightly. DAL believes the intent of the instructions provided in the RDAF supersede the requirements of this AD. Examples of the wording are as follows:

- ALI Task 531110 is Cancelled
 - ALI Task 531110 is no longer applicable
 - SB 1286/1295 is no longer applicable
 - MPD task 53-11-10 is no longer applicable
 - The ALI task 53-11-10 is deleted from ALS part 2 and is superseded by SB A320 53-1286. For FR20LHS the SB A320-53-1286 is no longer applicable
- DAL kindly requests that EASA confirm that any of the previous wordings is acceptable as a terminating action to the requirements of para (1) of this AD.

List paragraphs that change; describe (nonobvious changes): Update the wording in para (10) Note 1 if deemed necessary by EASA.

EASA response:

Comment A: Comment not agreed. Airbus did not provide acceptable justification to increase the compliance time as proposed.

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

Comment B: Comment noted. The AD lists only mandatory instructions. Note 1 was adapted accordingly in the Final AD.

