

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-076

[Published on 16 June 2023 and officially closed for comments on 14 July 2023]

**Commenter 1: Spring Airlines Co., Ltd. – Li Yang – 27/06/2023**

### Comment # 1

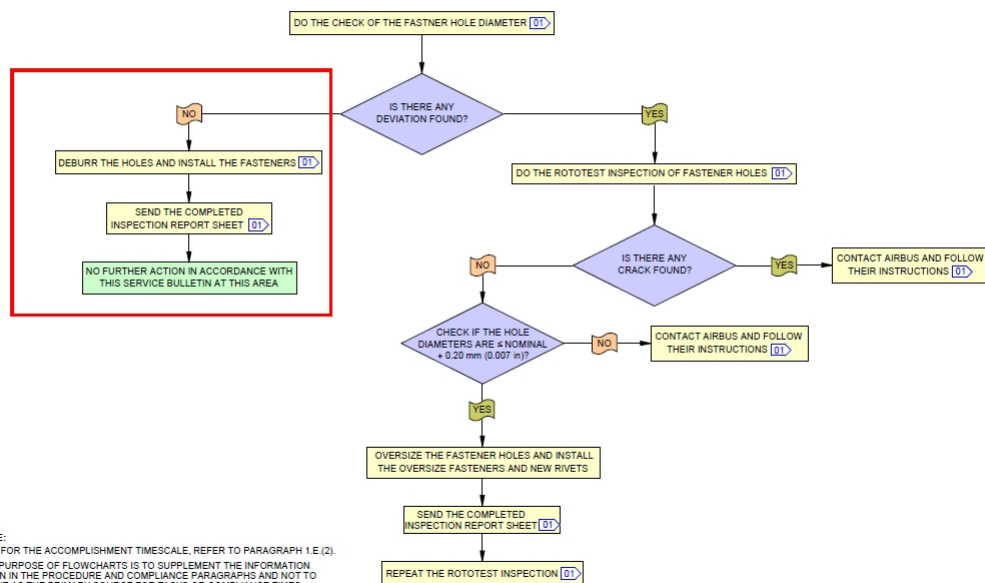
After reviewed PAD 23-076, we found the "Terminating Action" is None. While after reviewed SB A320-53-1493R00, there is one condition where this inspection can be terminated which is no deviation found of the fastener hole diameter of all affected areas. Please see the following flowchart.

So please consider whether it is necessary to include such condition of "Terminating Action" in PAD.

**AIRBUS**

**A318/A319/A320/A321**  
SERVICE BULLETIN

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NOTE:  
[01] FOR THE ACCOMPLISHMENT TIMESCALE, REFER TO PARAGRAPH 1.E.(2).  
THE PURPOSE OF FLOWCHARTS IS TO SUPPLEMENT THE INFORMATION GIVEN IN THE PROCEDURE AND COMPLIANCE PARAGRAPHS AND NOT TO SERVE AS THE PRIMARY SOURCE FOR TASKS OR COMPLIANCE TIMES GIVEN IN THIS SERVICE BULLETIN.

ICN-A320-A-53XX1493-A-FAPE3-02GZ7-A-003-01

**EASA response: Comment #1 agreed. The final AD has been updated accordingly.**



**Commenter 2: Deutsche Lufthansa AG – Andreas Ott – 27/06/2023****Comment # 2**

According to the SB compliance table, the flowchart figure ICN-A320-A-53XX1493-A-FAPE3-02GZ7-A-003-01 Fig.FA Sol.AA SHEET 1/1 of the SB A320-53-1493 and according to the webinar documentation related to that topic, in case of no deviation found during inspection according to AD §1, the inspected holes have to be deburred, fasteners installed and the completed inspection reporting sheet sent to Airbus. Thereafter no further action is required for that area.

That option is not described with the provided PAD. If the AD will be published without any information related to that, the inspection has also to be performed at the defined interval for areas without any deviations. Therefore DLH requests EASA to add a terminating option for areas where no deviations have been identified during inspection.

In addition to that, the PAD does not provide information if repair instruction that have been provided by Airbus after crack findings or hole diameters are  $\leq$  Nominal + 0.2 mm terminates/supersedes the inspection requirement of the AD.

DLH requests to update that information.

Furthermore, DLH misses a statement on the AD that, with release of the AD, existing concessions related to that topic and their requirement to inspect the deviation from production are covered by the AD.

At the moment DLH has to perform the inspection according concession requirement every 24 months. With the release of the AD, we have a discrepancy between the inspection requirement of the AD that is 44.100FC and the concession requirement that states every 24 months.

**EASA response: Comment #2 agreed.**

**See answer for comment #1 for the terminating action. Additionally, a credit paragraph has been added in the final AD to address the above comment.**

