

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-082

[Published on 06 July 2023 and officially closed for comments on 03 August 2023]

**Commenter 1: Gulf Air – Mohamad Al Charif – 09/07/2023**

### Comment # 1

In formality:

1. Appendix 1 Table lists galley series in non-ordered numbering. (we believe it is in sequence of Galley locations) if found our point feasible, appreciate if it can be rearranged like on previous AD 2021-0183R01 where unit galley numbering is listed (i.e: G2A, G4X G5 etc...)
2. Under supersedure: it list “this AD supersedes EASA AD 2021-0183R1 Dated 20 September 2021”. This can be mistakenly interpreted as revision 01 is superseded but not initial issue especially that AD Revision 1 states “This AD revises EASA AD 2021-0183 dated 04 August 2021” and does not says it supersedes it. If agreed, appreciate if statement is changed to list superseding initial and R1 issues.
3. Under applicability: models are listed with last phrase stating, “all manufacturer serial numbers”. We do understand it is for all MSN equipped with affected galleys as per appendix 1, thus appreciate if you can add “all manufacturer serial numbers equipped with affected galleys as per appendix 1”
4. Under groups: it is listed that group 2 are those who do not have an affected PN installed. Later group 2 is listed as aircraft having affected galleys installed “ from 18 August 2021 (the effective date of the EASA AD 2021-0183 at original issue) ” besides the fact that such statement enforce a possible misunderstanding as listed in point 2, definition of group 2 if our point in item 3 is found invalid, means that there is a range of applicable aircraft with no affected galleys are applicable with unknown action to be done.

NOTE: Item 3 and 4 came to our attention after AD 2021-0183 issuance which is drafted the same way.

5. GVI after repair: this section was not listed in previous AD and thus we believe it shall goes under new requirements.

Thanks for your understanding, our above comment might be “too picky” but such details are always dig by the lessors at phase out.

In content:

6. Under corrective action(s) the AD mandates to carry applicable corrective action while when reading the Airbus inspection SB calling for OEM SB there is always a clause allowing dispatch without corrective actions but rather thru load reduction on galleys.

Note:



We do understand that a corrective action is the quick fix repair or interim repair or modification but not cart load restriction which is operational.

It is quite uncommon to see on a vendor SB an OEM allowing aircraft dispatch condition (which is operational in nature).

Appreciate if EASA can explain if such load reduction is considered valid and acceptable, if yes it would be greatly appreciated if you can, under corrective action, amend the phrase to read "accomplish corrective action or load reduction in accordance with the instruction of the inspection SB".

7. Please note that we currently have the following fleet on order where MSN 11243 is already delivered.

	AC REG	MSN	FSN	MODEL	VER/RANK
1	A9C-XA	11243	351	321-253NX	GFA06/001
2	A9C-XB	11567	352	321-253NX	GFA06/002
3	A9C-XC	11611	353	321-253NX	GFA06/003
4	A9C-XD	11737	354	321-253NX	GFA06/004
5	A9C-X	11925	355	321-253NX	GFA06/005

This fleet has

- G2A PN installed is 601865-007801 (Green Galley PN 601865-001511)
- G5 PN installed is 601858-032201 (Green Galley PN 601858-001511)

In reference to the PAD appendix 1, none of these galleys is considered affected. However in reference to the Delivery document of subject aircraft as listed in "AIRWORTHINESS DIRECTIVES COMPLIANCE LIST PRINTING" Ref: LS2300603 page 11 of 16 (ref enclosed extract) the statement implies effective but not due.

Airbus is kindly requested to look into this matter and amend document LS2300603 to state "not applicable" for AD 2021-0183R1 if deemed not applicable. Alternately if statement is correct, please coordinate with EASA to include subject galleys in the Appendix 1 of PAD 23-082.

Further to below message, and after review of subject mod SB no A320-25-1CBP R01 in which all our existing A320 and A321 NEO fleet is applicable (ref below table 1), we could not find any of subject galleys PN effective where the VSB's quoted in this mod SB are:

VSB 601800-25-017

VSB 601800-25-018

VSB 601800-25-019



	AC REG	MSN	FSN	MODEL
1	A9C-TA	8323	201	320-251N
2	A9C-TB	8779	202	320-251N
3	A9C-TC	9030	203	320-251N
4	A9C-TD	9188	204	320-251N
5	A9C-TE	9331	205	320-251N
6	A9C-TF	9380	206	320-251N

	AC REG	MSN	FSN	MODEL
1	A9C-NA	9433	301	321-253NX
2	A9C-NB	10169	302	321-253NX
3	A9C-ND	10256	303	321-253NX
4	A9C-NC	10306	304	321-253NX
5	A9C-NE	10972	305	321-253NX
6	A9C-NF	11221	306	321-253NX
7	A9C-NG	11503	307	321-253NX
8	A9C-NH	11536	308	321-253NX

	AC REG	MSN	FSN	MODEL
1	A9C-XA	11243	351	321-253NX
2	Upcoming	11567	352	321-253NX
3	Upcoming	11611	353	321-253NX
4	Upcoming	11737	354	321-253NX
5	Upcoming	11925	355	321-253NX

Table1: GFA A320/321 NEO fleet

In reference to your published TFU no 25.30.00.054 our fleet shall fall under applicability of VSB no VSB 601800-25-020 and VSB 601800-25-022 yet to be issued soon. Below table 2 is a summary of our understanding based on TFU however all this does not tally with EASA PAD, Mod SB and the called VSB's no 017,018,019. Also besides the matter of Airbus AD status report of newly delivered (highlighted in previous e mail) and in spite that common sense could answers the majority of our questions, from a Quality perspectives and from lessor perspectives (needless to mention local authority audit) it is always difficult to explain how an effective SB called by an applicable AD is actually not effective. Even worst, within the VSB (018 and 019), which



we believe they are not effective, the green galley PN is actually effective. Additionally, for Airbus inspection SB calling Safran inspection VSB, it is the green Galley PN that determines the effectivity while on mod VSB it seems the other way around.

G2A	GG2A	FSN	Group	SB
601865-005501	601865-001011	201	FWD-GROUP 3	601800-25-020
601865-006701		202-300	FWD-GROUP 3	601800-25-020
601865-006401	601865-001411	301-350	FWD-GROUP 5	601800-25-022
601865-007801	601865-001511	351-400		

G5	GG5	FSN	Group	SB
601858-024301	601858-001011	201-300	FWD-GROUP 3	601800-25-020
601858-029401	601858-001411	301-350	FWD-GROUP 5	601800-25-022
601858-032201	601858-001511	351-400		

Table 2: Effectivity of fleet versus VSB

You are kindly requested to:

- 1- Provide a confirmation of correctness for our applicability understanding listed in above table 2.
- 2- Amend Mod SB no 25-1CBP to tally with proper effectivity (i.e: remove gulf air effectivity in case above table are correct).
- 3- Advise whether a new mod SB will be issued to cover VSB 601800-25-020 and VSB 601800-25-022 and thus a new AD (or AD revision) will be issued accordingly to accept the upcoming modifications as terminating actions.

Note: we honestly hope that you are not going to revise the SB A320-25-1CBP to R02 to add these upcoming VSB's as you did in R01 where you added the VSB 019. From a methodological approach, it does not seem accurate that a new upcoming Vendor VSB mod numbers quoted in a revised Airbus covering SB are to be considered terminating of an AD where at time of that AD issuance these mods didn't exist.

**EASA response:**

**1. EASA agrees: The list of the Affected Galleys have been reordered based on root P/N independently of location (G1, G2, ...).**

**The revised PAD has been updated accordingly.**

**2. We disagree. According to published EASA Continuing Airworthiness Procedures superseding ADs replace the superseded ones, including their previous revisions, if applicable. It is the EASA policy to refer to the last revision of the superseded document only.**



*No changes have been made to the revised PAD in response to this comment. Please note the change of the paragraph numbering in the revised PAD.*

*3. We disagree. The AD is applicable to aeroplane types and models, all serial numbers. The Part(s) Installation paragraph specifies that it is applicable also to aeroplanes which (currently) do not have the affected part installed. Therefore, the Applicability shall include all serial numbers.*

*No changes have been made to the revised PAD in response to this comment.*

*4. We disagree. The Part(s) Installation paragraph retains installation restriction introduced earlier by AD 2021-0183 and restates that, for Group2 aeroplanes (as defined in the original issue of PAD 23-082) installation of the affected part is allowed (but not mandated), provided that the conditions specified in that paragraph (4) are met. This paragraph does not confirm that the listed affected parts are installed from 18 August 2021 [the effective date of the EASA AD 2021-0183 at original issue]. See also reply to above comment 2.*

*No changes have been made to the revised PAD in response to this comment.*

*5. Comment noted. Paragraph (4) requires general visual inspections (GVI) after repair which were part of AD 2021-0183R1. The statement “New Requirements” were removed because paragraphs (6) and (7) of the AD (as defined in the original issue of PAD 23-082) do not impose required action but provide provisions for terminating action which accomplishment is on the decision of the operator.*

*We have amended the revised PAD accordingly.*

*6. Comment noted. According to the paragraph (2) of this AD (as defined in the original issue of PAD 23-082) in case of findings, corrective actions as defined by the SB are required. It includes allowance to dispatch the aeroplane with limited loads. This cannot be considered as a terminating action whereas the modification of the galley is considered as a terminating action as detailed in paragraphs (5) and (6) of the AD (as defined in the original issue of PAD 23-082).*

*No changes have been made to the revised PAD in response to this comment.*

*7. Comment noted. The comment is primary addressed to the Airbus and the EASA CRD is not the appropriate platform to address this comment. EASA recommends contacting Airbus for clarification.*

*No changes have been made to the revised PAD in response to this comment. Please note the change of the paragraph numbering in the revised PAD.*

**Commenter 2: DAT LT – Agnė Margytė – 11/07/2023**

**Comment # 2**



As per recently released EASA PAD 23-082, affected part numbers should be modified IAW Airbus SB A320-25-1CBN. In our fleet, we have AIRBUS MSN 6733, reg. OY-RUY which has following part numbers installed:

- G2: P/N: 601865-004301
- G5: P/N: 601858-011301

They both are affected. However, as per SB A320-25-1CBN:

„This Service Bulletin is only applicable for aircraft installed with one (or more) of the galley PNs which are modified in accordance with associated VSBs.

These modifications (MOD No. 171406K34312 and MOD No. 171407K34313) are applicable by Service Bulletin only.

CONF 001 is applicable for aircraft on which galley PNs are modified in accordance with SAFRAN CABIN CZ SRO (4050G) VSB 601800-25-018 or SAFRAN CABIN CZ SRO (4050G) VSB 601800-25-019.

CONF 001 retrofits following modifications: 171406K34312, 171407K34313.“ – and there is only one configuration.

Could you please clarify if terminating action in accordance with PAD 23-082 is only for those who had VSB 601800-25-018 or VSB 601800-25-019 done. MSN 6749 is PRE VSB 601800-25-018 and PRE VSB 601800-25-019.

**EASA response:**

***Comment noted. Due to industrial constraints, original issue of Airbus SB 25-1CBN does not provide modification solution for all affected P/N. Airbus is revising this SB to add the solution for all P/N. In addition, by conservatism and in line with the current AD, Revision 1 of the SB is applicable to non-affected MSNs and it is expected that Airbus will correct the SB at the next foreseen revision.***

***The comment also includes particularities which appear to be primary addressed to Airbus and the EASA CRD may not be the appropriate platform to clarify these comments. EASA recommends to contact Airbus for clarification.***

***No changes have been made to the revised PAD in response to this comment. Please note the change of the paragraph numbering in the revised PAD.***

**Commenter 3: American Airlines – Pat Kelley – 01/08/2023**

**Comment # 3**



Please see attached for comments regarding EASA PAD 23-082 requesting clarification of the terminating actions/modifications for use of an affected MPN "Spare Galley" that may be owned by the operators. Operators own spare galleys and occasionally remove and replace galleys during service. Operators therefore need clarification regarding accomplishment of the terminating modifications via AD applicable Airbus SBs/SAFRAN VSBs, and understand subsequent requirements for installation onto an aircraft. Also need EASA/Airbus/SAFRAN to confirm requirements for updating/modifying a spare galley's data plate accordingly.

1. Par. (5): modifications to a "spare galley" installed on an aeroplane or held as a "spare galley"?
2. Par. (6): EASA should clarify that any post-SB modified "spare galley" is acceptable to be installed on an aeroplane without additional repetitive inspections.

**EASA response:**

**1 Comment noted. The AD mandates action to be accomplished on an aeroplane. For galleys held as "spare galleys" paragraph (4) Part(s) (as defined in the original issue of PAD 23-082) Installation is applicable when these "spare galleys (being affected parts) are installed on an aeroplane. To address post-modification SB "spare galleys" (reidentified and therefore not affected parts) paragraph (8) was added to improve the AD wording clarity.**

**2. We agree. We have amended the revised PAD accordingly. Please note the change of the paragraph numbering in the revised PAD.**

**Commenter 4: Delta Air Lines – Cecilia Teeuwen – 03/08/2023**

**Comment # 4**

Reference:

EASA Proposed Airworthiness Directive: PAD No. 23-082, dated 06July23

Clarify if **Terminating Action** per paragraph (5) **can be accomplished in lieu of Inspection** per paragraph (1) of PAD No. 23-082.

Similarly, clarify if Inspection per paragraph (1) is required if operators will proactively remove and replace an affected part with a part that is not affected.

Operators wishing to reduce maintenance costs by NOT performing the Inspection(s) per paragraph (1) and instead either:

- 1) Accomplishing the modification of an affected galley per Terminating Action paragraph (5) to restore the design integrity of the affected galleys OR
- 2) Removing and replacing affected parts and installing NOT affected parts, effectively configuring an airplane from group 1 to group 2



are correcting the condition addressed by PAD No. 23-082.

Add the following text in red to paragraphs (5) and (6) and ADD paragraph (7) also in red:

**Terminating Action:**

(5) Modification of an affected galley on an aeroplane, accomplished in accordance with the instructions of the modification SB, constitutes terminating action for the **initial and** repetitive inspections as required by paragraphs (1) and (4) of this AD, as applicable, for that galley.

(6) Modification of all affected galleys on an aeroplane, accomplished in accordance with the instructions of the modification SB, constitutes terminating action for the **initial and** repetitive inspections as required by provided no affected parts are reinstalled on that aeroplane after that modification.

(7) Modification of an aeroplane from Group 1 and Group 2 by removing affected parts constitutes terminating action for the initial and repetitive inspections as required by paragraphs (1) and (4) of this AD, as applicable, for that aeroplane, provided no affected parts are reinstalled on that aeroplane, such that that aeroplane remains Group 2.

**EASA response:**

**1. We agree. We have amended the revised PAD accordingly, however, please note the change of the paragraph numbering in the revised PAD.**

