

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-087

[Published on 18 July 2023 and officially closed for comments on 15 August 2023]

**Commenter 1: Interglobe Aviation Limited (Indigo) – Debapriya Chatterjee – 20/07/2023**

### Comment # 1

A. Definition of “Aeroplanes Approved for operation in CIS (.....)”

As per the definition in the PAD, the AD will be applicable to all aircraft on which the specified MODS have been accomplished irrespective of its current area of operation. As such we feel that the reference made to as “CIS aeroplanes” in the definition is not necessary and, in fact, might create confusion. Instead, won't it be more appropriate to simply define “Affected Airplane”?

B. Similarly, the Group definitions can also simply state as:

Group 1: Affected Airplane that have an affected part installed.

Group 2: Affected Airplane that do not have affected part installed.....

Group 3: Are airplanes that are not either Group 1 or Group 2 airplane.

C. The PAD is not clear on a situation where the airplane is not a “CIS Airplane” but has an “affected part” installed. Won't the unsafe condition on the affected part remain unaddressed in this situation?

### EASA response:

**A. EASA disagrees: The wording of the definition “Aeroplanes approved for operation in CIS...” specify the configuration status of the affected aeroplanes by listing the modifications (mod) and service bulletins (SB) which embodiment make an aeroplane subject of the definition, irrespective of its current area of operation. These modifications and SBs were originally developed for aeroplanes intended to be operated in the Commonwealth of the Independent States (CIS) and these mods and SBs are known for affected operators as prerequisites for “operations in CIS”. No change was made to the revised PAD 23-087.**

**B. Comment noted, see answer above. No change was made to the revised PAD 23-087.**



- C. Comment noted. Aeroplanes which are “not CIS aeroplanes” belong to Group 3. These aeroplanes may have or may not have an affected part installed. The unsafe condition is present only in aeroplanes approved for CIS operation and equipped with an affected part (Group 1 aeroplanes). For Group 3 airplanes paragraph (5) applies.**
- Definition of Group 3 aeroplanes was amended in the revised PAD 23-087.**

**Commenter 2: Volotea – Simón Vergara Gómez – 24/07/2023**

**Comment # 2**

- A. Affected parts installed on aircraft that ARE NOT currently approved for operation in CIS (group 3) are NOT affected by the PAD. Please confirm.
- B. Affected parts that were operated in aircraft approved for operation in CIS, that were later removed and reinstalled in aircraft not-CIS, are NOT affected by the PAD. Please confirm.
- C. In relation to point B, history of component is not relevant and only modifications at aircraft level (on which these parts are currently installed) are relevant to determine if a part should be recertified. Please confirm.
- D. PAD should be applied at aircraft level, not at component level (in terms of component’s history and modifications). Please confirm.

**EASA response:**

- A. See reply to Comment 1C**
  - B. See reply to Comment 1C.**
  - C. See reply to the Comment 1C.**
  - D. Comment noted. The AD applies on aeroplane level and the required action depends on aeroplane configurations. However, review and determination of the Nose Landing Gear (NLG) history, is necessary to determine whether the NLG part is an affected part.**
- No change was made to the revised PAD 23-087.**

**Commenter 3: Scandinavian Airlines System (SAS) – Thang Duong – 02/08/2023**



**Comment # 3**

SAS is currently in Configuration 3. This means there are no actions to be taken for SAS as we understand. The only applicable paragraph to SAS would be §5.

With that said, SAS do most probably have affected parts as affected parts are classed by the following definition:

***“Affected part: A Nose Landing Gear (NLG) part, as listed in Table 1 of this AD, that has been repaired in accordance with Airbus or Safran Landing Systems (SLS) repair instructions issued prior to 01 July 2018, or for which a repair concession has been issued prior to 01 July 2018; and any NLG part, listed in Table 1 of this AD, for which it cannot be determined whether a repair has been accomplished in accordance with Airbus or SLS repair instructions or repair concessions issued prior to 01 July 2018;***

*except*

*those parts which have been repaired as required by paragraph (1) of this AD, or for which a letter of compliance from SLS has been issued to confirm that a fatigue reassessment has been accomplished in accordance with Airbus approved instructions, and no additional action is required.”*

However, as SAS is in Configuration 3, there are no actions to be taken, so our question is to get confirmation that if an aircraft is in Group 3 (i.e Not CIS Aeroplane), an affected part can remain installed indefinitely without any restrictions as §3 & §4 only applies for Group 1 & Group 2.

Please confirm.

If confirmed, I suggest to have this added to the AD when released. Either as its own point or as a note to §5 of the PAD 23-087.

**EASA response:**

***Comment noted. SAS understanding is correct. For Group3 aeroplanes only paragraph (5) applies. For clarity Definition of Group 3 aeroplanes was amended in the revised PAD 23-087.***

**Commenter 4: American Airlines (AAL) – Ben Niaki – 08/08/2023****Comment # 4**

American Airlines (AAL) notes that the subject PAD only lists potentially impacted NLG part numbers and no affected serial numbers, meaning that AAL and all other worldwide operators need to research their own individual records to determine if they are operating affected parts. AAL feels that Airbus and Safran Landing Systems (SLS) already have records of which components have been subject to a repair in accordance with a specific Repair Design Approval Sheet (RDAS) or Repair Concession (RC) and which of those components operated in the CIS region under authority of those RDAS or



RC repairs. AAL therefore requests that EASA PAD 23-087, Airbus OIT 999.0013/23 and SLS SIL 580-32-3203 be revised to include specific serial numbers of affected parts to make the impact of this proposed ruling clearer. Asking operators to conduct their own research of affected parts will only lead to non-compliance of this proposed AD.

**EASA response:**

*Comments noted. The complete list of parts that received a repair from SLS and/or Airbus cannot be established with an acceptable proofness. It must be noticed also that some repairs (outside SLS/Airbus scope) could have been re-applied on parts to which the repair was not originally approved for. Therefore, the action remains at operator level to ensure integrity of the parts.*

*No change was made to the revised PAD 23-087.*

**Commenter 6: Cathay Pacific – Bharat Yadav – 14/08/2023**

**Comment # 6**

For Group 3 operators that have ex-CIS NLG parts installed, can EASA confirm that no additional work is required? If so, then please make a statement as such in the AD, e.g.:

“For Group 3 operators that have parts from EX-CIS operated NLG, no further work is required on-wing.”

**EASA response:**

*See reply to Comment #3.*

**Commenter 7: Delta Air Lines – Cecilia Teeuwen – 14/08/2023**

**Comment # 7**

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 23-087, dated 18 Jul 23

(B) MESSIER-DOWTY 580-32-3167, dated 16 Apr 08

(C) Airbus Service Bulletin SB A320-32-1308, dated 13 Oct 09



**Comment #1**Commenter Request

Add Model A321-213 in the applicability paragraph of Ref (A).

Request justification

The A321-213 model is a derivative of the A321-211 model with rerated engines. An affected part could be installed on an A321-213 aeroplane that has been converted from an A321-211 model by rerating the engines.

List paragraphs that change; describe (nonobvious) changes

Applicability:

Airbus A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-231, A320-232, A320-233, A320-251N, A320-252N, A320-271N, A321-211, **A321-213**, A321-231, A321-232, A321-251N, A321-251NX, A321-252N, A321-252NX, A321-253N, A321-253NX, A321-271N, A321-271NX, A321-272N and A321-272NX aeroplanes, all manufacturer serial numbers.

**Comment #2**Commenter Request

If a part that has complied with MESSIER-DOWTY 580-32-3167, Ref (B), is installed on a Group 3 aeroplane, does this part installation change the Group 3 aeroplane to a Group 2 aeroplane?

Request justification

MESSIER-DOWTY 580-32-3167, Ref (B) is nested within Airbus SB A320-32-1308, Ref (C).

List paragraphs that change; describe (nonobvious) changes

For Group 3 aeroplanes: From the effective date of this AD, it is allowed to modify an aeroplane in accordance with the instruction of Airbus SB A320-00-1260, or SB A320-32-1308, or A320-32-1422, provided no affected part is installed on that aeroplane. Following that modification, the aeroplane is effectively a Group 2 aeroplane.

**For Group 3 aeroplanes on which a post Ref (B) part is installed, following that modification, the aeroplane is effectively a Group 2 aeroplane.**

***EASA response:***

***Comment 1: Comments agreed. Missing models have been added to the revised PAD 23-087.***

***Comment 2: Comments noted. Embodiment of the MESSIER-DOWTY 580-32-3167 alone does not classify the aeroplane to be Group 2.***



***No change was made to the revised PAD 23-087.***

