

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-102

[Published on 15 September 2023 and officially closed for comments on 13 October 2023]

Commenter 1: Delta Air Lines, Inc. – Michael D. Tharp – 28/09/2023

Comment # 1

Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 23-102, dated 15 September 23

(B) Airbus Alert Operators Transmission (AOT) A57N018-21 Rev 00, dated 08 November 21

(C) Airbus Alert Operators Transmission (AOT) A57N018-21 Rev 01, dated 14 June 23

Comment A

Commenter Request

Update the effectivity definitions in REF[A] (“CEO aeroplanes” and “NEO aeroplanes”) to align more closely with the effectivity definition in REF[C] and remove the following statement “having a configuration as defined in EASA TCDS EASA.A.064” from both definitions.

Request justification

REF[C] defines effectivity as:

- A319/A320/A321_CEO aircraft equipped with Sharklet devices installed in production or in-service as per Airbus Service Bulletin (SB A320-57-1173, or SB A320-57-1186 or SB A320-57-1187 or SB A320-57-1193).
- And all A319/A320/A321_NEO aircraft.

This definition makes no reference to the aircraft certificate of worthiness or type certificate data sheet.

DAL is not aware of many EASA ADs that incorporate the TCDS into the effectivity definition.

Furthermore, DAL is concerned that by specifying the TCDS, operators will be required to perform an unnecessary records review through delivery documentation to prove that all aircraft do in fact have a “configuration as defined in EASA TCDS EASA.A.064.”

Furthermore, DAL does not believe that adding the verbiage “configuration as defined in EASA TCDS EASA.A.064,” adds any additional clarity to the effectivity definition with REF[A].



List paragraphs that change; describe (nonobvious) changes

Definitions:

Change Definition for “CEO aeroplanes” and “NEO aeroplanes”.

Comment BCommenter Request

Update the effectivity definition in REF[A] “NEO aeroplanes” to align more closely with the effectivity definition in REF[C] and update the following statement “with either LEAP-1A or PW1100G series engines installed” to the following statement:

“with either LEAP-1A or PW11XXGX-XX series engines installed”

Request justification

REF[C] defines effectivity as: “all A319/A320/A321_NEO aircraft.”

Per the aircraft certificate of airworthiness for the DAL A321NEO fleet, engine type is defined as “PW1133GA-JM”.

It is not clear if PW1133GA-JM engine type is part of the “PW1100G series”.

DAL is concerned that the definition of the NEO engine per REF[A] is not clear enough and may potentially lead to uncertainty regarding the effectivity status of DAL’s NEO engine.

List paragraphs that change; describe (nonobvious) changes

Definitions:

Change Definition for “NEO aeroplanes”.

Comment CCommenter Request

Add a statement to REF[A] that “Paragraph 4.2.1 “Access” and paragraph 4.2.4 “Close-Up”, do not constitute or affect the technical intent of the AOT. Operators can therefore, as deemed necessary, omit or add access and/or close-up steps to add flexibility to their maintenance operations as long as the technical intent of the AOT is met within the set parameters.”

Request justification

There are several occurrences of “in accordance with” language within REF[C] that should be “refer to” language. These occurrences do not appear in Required for Compliance (RC) paragraphs:

- 1) Paragraph 4.2.1 (ACCESS) - For both wings, it is required to remove the fixed fairing of the Flap Track n°4 (in accordance with the Ref.[2]) to perform the DVI.



2) Paragraph 4.2.4 (CLOSE-UP) - In case of nil finding, reinstall the fixed fairing of the Flap Tracks n°4 (in accordance with the Ref.[3]) before next flight. However, there are several “in accordance with” references from RC paragraphs to paragraph 4.2 (which includes the access and closeup steps):

1) 4.1.1 ACCOMPLISHMENT TIMESCALE – (RC): “Perform the initial inspection in accordance with paragraph 4.2.”

2) 4.1.1 ACCOMPLISHMENT TIMESCALE – (RC): “Repeat the inspection in accordance with paragraph 4.2.”

Based on similar conversations with the FAA regarding similar use of “in accordance with” language, it may be understood that since paragraph 4.1.1 which is a “RC” paragraph, refers to paragraph 4.2 with “in accordance with” verbiage, all the actions within para 4.2, (including access and close-up steps) must be done “in accordance with” the referenced manuals.

As a consequence, the note within REF[A] that “Operators can therefore, as deemed necessary, omit or add access and/or closeup steps to add flexibility to their maintenance operations as long as the technical intent of the AOT is met within the set parameters” is no longer relevant or applicable for AD compliance.

List paragraphs that change; describe (nonobvious) changes

Definitions:

Add new paragraph to the PAD to allow for operator discretion while performing access and close-up steps.

EASA response:

Comment A: EASA disagrees. The AD is applicable to aeroplane models listed in the Applicability section of the AD. The definitions of CEO and NEO aeroplanes (in the Definitions section) are not intended to determine the AD applicability but define which aeroplane configuration is called in the AD as “CEO” and which one is called as “NEO”. The TCDS EASA.A.064 is the official document where the configuration of the CEO and NEO aeroplane are officially stated and defined.

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

Comment B: Comment noted. International Aero Engines (IAE) model PW1133GA-JM is part of the IAE PW1100G-JM engine type design, please refer to EASA TCDS IM.E.093. Other Airbus NEO aeroplanes are equipped with other engine models also belonging to IAE PW1100G-JM engine type.

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

Comment C: EASA disagrees. EASA has not implemented yet into its AD process the Required for Compliance (RC) concept (unlike the FAA). The EASA ADs require for compliance accomplishment of the entire service instructions referenced in the ADs. Any deviation from that shall be managed using the AMOC (Alternative Method of Compliance) process.

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



Commenter 2: British Airways – Tom Eldridge – 10/10/2023**Comment # 2**

For ease and simplicity in ensuring compliance is met (and considering human factors) BAW recommends that the AD compliance tables show both the SB numbers and the Mod numbers, such that equivalence can be more easily shown to the AOT compliance.

EASA response:

Comment #2: Comment noted. There is no straightforward way to link between each SB to modification number. Airbus distinguishes between production and retrofit modifications by mentioning the MOD number for production and the SB number only for retrofit. In addition, certain SBs are linked to several MODs. For the reasons above it is not feasible to list the retrofit modification numbers linked to SB numbers.

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

Commenter 3: United Airlines – Ali Nowrouzi – 13/10/2023**Comment # 3**

“Reporting Requirements”:

Airbus Alert Operators Transmission (AOT), in paragraph 4.2.3, which is a Required for Compliance (RC) section states “In case of findings, before next flight, contact Airbus for approved repair instructions”.

Since any crack finding(s) will be reported to Airbus, we request EASA to delete the requirements to report all nil findings to Airbus as stated in paragraph (4) of PAD 23-102.

EASA response:

Comment #3: Comment noted. To monitor the infield management of the unsafe condition addressed by the future AD and support the still ongoing Airbus investigation, feedbacks of nil findings are needed.

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

