

COMMENT RESPONSE DOCUMENT

EASA PAD No. 23-114

[Published on 18 October 2023 and officially closed for comments on 15 November 2023]

Commenter 1: Deutsche Lufthansa AG – Ainara Ziarrusta Atutxa – 13/11/2023

Comment # 1

The PAD refers several times to ALI Tasks 531153-02-2 and 531155-02-2 for FR16 RH and FR20 RH locations. However these ALI Tasks have been deleted with ALS Variation 9.2. The ALI tasks for those locations are now named as 531153-03-1 and 531155-03-1 since ALS Variation 9.2.

Therefore DLH requests EASA to correct the ALI Task references where appropriate.

EASA response:

Comment agreed. Further to EASA AD 2021-0227 mandating the ISBs for CEO, the associated ALIs have been updated to remove the CEO from applicability. In addition due to error in the Note of the ALI tasks, ALI 531153-02-2 has been replaced by ALI 531153-03-1 and the ALI 531155-02-2 by ALI 531155-03-1 in ALS Part 2 Variation 9.2 (dated 10 November 2022) and mandated by EASA AD 2023-0008.

The Table defining the Compliance Time was divided into two tables applicable to CEO and NEO aeroplanes, respectively. The AD does not mandate accomplishment of ALI tasks 531153-02-2 and 531155-02-2 but provides credit or refers to past accomplishment of these ALI tasks for compliance time counting purposes. Operators likely have accomplishment of ALI tasks 531153-02-2 and 531155-02-2 recorded in their maintenance or continued airworthiness records under these designations and therefore, where appropriate, the final AD keeps reference to these ALI tasks and corrects them where appropriate.

The final AD was amended accordingly.

Commenter 2: Pegasus Airlines – Mehmet Mert – 15/11/2023

Comment # 2



PAD 23-114 provides information and gives credit for ALI tasks 531153-02-1, 531153-02-2, 531155-02-1 and/or 531155-02-2. However, 531153-02-2 and 531155-02-2 are deleted in MPD November 2023 revision. New tasks are added instead of these removed tasks. Can EASA confirm ALI tasks mentioned in PAD will be updated in accordance with the latest MPD revision?

EASA response:

Refer to answer to Comment #1

Commenter 3: Elbe Flugzeugwerke GmbH – Sarah Gebhardt – 21/11/2023

Comment # 3

The PAD refers to ALI tasks 531153-02-2 and 531155-02-2. These Tasks are deleted in Airbus A318/A319/A320/A321 ALS Part 2 DT-ALI Revision 09 Variations 9.2. Why are these tasks listed in the PAD?

The PAD refers to ALI tasks 531153-02-1 and 531155-02-1 which are only applicable to NEO configuration. So, the published Task in the PAD has limited applicability to NEO only.

From our understanding, it looks like the EASA wanted to expend the scope to CEO and NEO configuration as the ALI tasks from ALS Part 2 DT-ALI Revision 09 Variations 9.2 were limited to NEO configuration only. So, we would like to know if it is a typo, that the PAD mentions to include the applicability to NEO? Should it be CEO?



Since EASA AD 2021-0227 was issued, Airbus issued the inspection SB and modification SB for NEO aeroplanes.



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For the reason described above, this AD retains the requirements of EASA AD 2021-0227, which is superseded and expands the Applicability to include NEO aeroplanes.

EASA response:

Refer to answer to Comment #1



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