

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-013

[Published on 31 January 2024 and officially closed for comments on 14 February 2024]

### Commenter 1: British Airways – Germi Mattei – 02/02/2024

#### Comment # 1

With reference to subject PAD 24-013 as per definition paragraph Group 1 are the aeroplanes that have an affected part and group 2 are those which are not group 1.

Could EASA confirm that aircraft records are an acceptable means of compliance in order to verify that we do not have an affected part installed?

Would you please add it in the definition or even better if can be added as a paragraph on the AD?

#### EASA response:

**Comment noted. EASA is not the competent authority for the AD enforcement. Any method which is acceptable to the NAA can be used to determine if an affected part is installed. Please contact your responsible NAA for clarification.**

**No changes have been made to the final AD in response to this comment.**

### Commenter 2: All Nippon Airways Co., LTD –Yukihiro Bunno – 05/02/2024

#### Comment # 2

We have a question to the unit which should be replaced with, in the case of findings at the GVI.

PAD 24-013 defines as follows.

Definitions:

Serviceable part: Any "reservoir", eligible for installation.

PAD 24-013 describes as follows.



**Reason:**

For the reasons described above, this AD requires a one-time general visual inspection (GVI) of the affected parts, and, in case of findings, replacement of the "orifice fitting".

PAD 24-013 describes as follows.

**Corrective Action(s):**

(3) If, during the inspection as required by paragraph (1) of this AD, discrepancies, as defined in the AOT, are detected on an affected part, before next flight, replace that affected part with a serviceable part, in accordance with the instructions of the AOT.

It seems that the Corrective Action(s) orders to replace with the unit level of the reservoir while Reason suggests to replace with the unit of the orifice fitting on the reservoir, in case of finding.

For reference, we believe that AOT 25N027-23 referred in this PAD orders to replace with not the reservoir but the new orifice fitting, in case of finding.

**ACTION REQUESTED:**

Please confirm which unit PAD requires to be replaced with, the reservoir or the orifice fitting.

**EASA response:**

***Comment Agreed. The affected part is effectively the contaminated orifice fitting and the corrective action must be performed on the orifice fitting. The Affected Part and Serviceable Part definition was modified and Paragraph (4) was added in the final AD in response to that comment.***

**Commenter 3: United Airlines – Oscar Fernandez – 14/02/2024**
**Comment # 3**

United Airlines Engineering has reviewed EASA PAD 24-013 in its entirety and offer the following comments:

1. The work scope detailed in EASA PAD 24-013, Airbus AOT-A25N027-23-00, Safran VSB A321 005-25-45 & Safran VSB A321 005-25-46 is feasible. There should be no difficulty in gaining access for the inspection and performing the necessary corrective actions.
2. The proposed 3-month compliance time after the effective date of the AD needs to be reconsidered to a longer time frame (6 months from AD Effective Date). Safran VSBs A321 005-25-45 & A321 005-25-46 mention a lead time of 19 weeks for Orifice Fitting P/N M3SP-303-004-E which is beyond the compliance limit.



3. Safran VSB A321 005-25-46 Figure 1 has an error when illustrating the Reservoir and Valve Assembly. It mentions (71200-101, -103 SHOWN; 71200-102, -104 OPPOSITE). It should read (70200-101, -103 SHOWN; 70200-102, -104 OPPOSITE).
4. As of today, United Airlines has two units (P/N 70200-103 S/N 70200-C2781 & P/N 70200-103 S/N 70200- C2782) affected by the proposed AD and they are currently in our Inventory. These two units will be reworked by the Shop.

***EASA response:***

1. ***Comment noted.***
2. ***Comment not agreed. The compliance time is the result of a risk assessment performed by the TC holder and EASA experts. Please contact your responsible NAA for a compliance time extension, if needed.***
3. ***Comment noted.***
4. ***Comment noted.***

***No changes have been made to the final AD in response to this comment.***

