

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-019

[Published on 05 February 2024 and officially closed for comments on 04 March 2024]

**Commenter 1: Delta Air Lines, Inc – Kimberly Davis – 26/02/2024**

Comment # 1

Reference:

(A) EASA PAD 24-019, Pylon/Nacelle – Air Intake Cowl Inspection

(B) Airbus Service Bulletin A350-54-P009 rev 00 dated 22-Dec-2023.

(C) Collins Service Bulletin RA35071-029, dated 16 Nov 2023

### Comment A

#### Commenter Request

Reasons for submitting data are not explained or substantiated. Delta Air Lines recommends making the task to submit findings optional.

#### Request justification

Neither the Airbus Service Bulletin nor the Collins Service Bulletin provide any reason to substantiate the need for operators to submit their findings or Collins to receive the data.

The EASA PAD paragraph (3) defines that reporting is mandatory within 30 days of accomplishment of the inspections. And paragraph (3) uses the “in accordance with” language which is commonly associated with mandatory tasks which must be done in a specific manner. Therefore, the submission of the data must be done using the form in the Airbus Service Bulletin.

The task to submit findings is not trivial. Operators must do more than inspect and correct the cowl, now they must collect which fastener hole had which type of damage, they must fill out the form provided in the Airbus Service Bulletin, and they must track the reporting deadline in order to prove that all reports were submitted on time.

Since neither of the Service Bulletins provides a reason for operator to submit the data, Delta Air Lines recommends making the task to submit findings optional.



List paragraphs that change; describe (nonobvious) changes

Revise Paragraph (3) of the EASA PAD to make reporting recommended but not mandatory, and to remove the “in accordance with” language in paragraph (3).

**Comment B**Commenter Request

If data reporting is determined to be vital, Delta Air Lines recommends making the deadline to submit findings to within 30 days of the return to service date of the visit rather than within 30 days of the inspection finding.

Request justification

When reporting is required, Delta requests that the EASA PAD and AD allow up to 30 days following the return to service date of the visit (instead of 30 days from finding). While the visit is ongoing, all of the paperwork remains with the airplane, so while Engineering may be aware of the finding, we may not yet have access to the details of the finding or repair until after the visit is closed and the files are sent to the central repository.

For these reasons, Delta Air Lines recommends making the deadline to submit findings (if required) to be 30 days from the end of the visit.

List paragraphs that change; describe (nonobvious) changes

If reporting is deemed as necessary, then revise Paragraph (3) of the EASA PAD to be 30 days from the end of the visit.

***EASA response:***

***Comment A : Comment not agreed. Reporting any inspection finding is deemed an essential requirement to assess the status of the fleet and validate the risk assessment associated to the unsafe condition addressed by this AD.***

***It is also to be noted that the AD states that reporting “can be accomplished in accordance with the instructions of the SB”, so it expresses a possibility but not a reporting manner requirement.***

***Comment B : Comment not agreed. The 30 days from inspection finding reporting requirement is deemed appropriate, striking a good balance between swiftness of reporting and the limited burden of this additional requirement.***

***No changes have been made to the Final AD in response to these comments.***

