

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-031

[Published on 08 March 2024 and officially closed for comments on 05 April 2024]

**Commenter 1: Delta Air Lines, Inc. – David Lashansky – 14/03/2024**

### Comment # 1

#### Reference:

(A) EASA Proposed Airworthiness Directive: PAD No. 24-031, dated 08 March 2024

(B) Airbus Service Bulletin (SB) A350-53-1527, dated 11 December 2023

#### Commenter Request

Current effectivity per Ref /A/ does not match effectivity definitions per Ref /B/ for the A319 fleet.

#### Request justification

A/C effectivity per Ref /A/ is defined in figure 1 below.

A/C effectivity per Ref /B/ is defined in figure 2 below.

Effectivity definition per Ref /A/ for the A319 fleet does not match the effectivity definition per Ref /B/ for the A319 fleet.

For example, per Ref /A/ if an A319 A/C has accomplished MOD 160001 only and not MOD 28162, 28238 or 28342. The A/C would NOT be affective to the AD.

However, per the requirements of Ref /B/, since the A/C has not achieved MOD 160001 AND 28162 OR 28238 OR 28342, the A/C WOULD be affective to the AD.

#### List paragraphs that change; describe (nonobvious) changes

#### Applicability:

Better clarity of A/C effectivity and explanation why Ref /A/ effectivity definition does not match Ref /B/ effectivity definition.



**EASA response:**

***Comment noted. The definition in the Ref /B/ SB is not understandably written and Airbus might clarify the applicability through a revision of the SB. The definition in the AD was the outcome of a discussion between Airbus and EASA. The definition in the AD is the correct one to be considered.***

***No change was made to the final AD in response to that comment.***

