

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-035

[Published on 19 March 2024 and officially closed for comments on 16 April 2024]

Commenter 1: AIR BUSAN – Hyunmin Moon – 20/03/2024

Comment # 1

There is a typo in Table 1 & Table 2 – Compliance Time of PAD 24-035 as below.

- 1 500 FC since 18 July 2021 [the effective date of EASA AD 2012-0118]

The effective date of EASA AD 2012-0118 is on 18 July 2012. It should be correct when the EASA AD is issued.

EASA response:

Comment agreed.

The final AD was updated to correct the year.

Commenter 2: JAL Engineering Co., Ltd. – Nobu Kondo – 21/03/2024

Comment # 2

JALEC reviewed PAD 24-035 and found one typo error about SB No. Table 1 of the PAD contains SB No. A320-**52**-1195. However it should be A320-**53**-1195. It would be appreciated if you could correct it when you issue the final AD.

EASA response:

Comment agreed.

The final AD was updated to correct the SB reference.



Commenter 3: Spring Airlines Co.,Ltd. – LI YANG – 25/03/2024**Comment # 3**

- A. In Table 1 for CEO threshold, we believe there is a typo for "SB A320-52-1195" and it should be read as "A320-53-1195".
- B. In Table 2, there is only "ALI 533154-10-1" mentioned, but in SB A320-53-1326, it was mentioned "Accomplishment of this Service Bulletin is expected to lead to cancellation of Airworthiness Limitation Item (ALI) task(s) reference Ref. ALI **533154-04-02** after the modification is addressed in a variation or revision to Airworthiness Limitation Section (ALS) Part 2." We know ALI 533154-04-02 was deleted and superseded by the new ALI 533154-10-1 since revision 9.2 of ALS PART 2, but there may be a few aircraft that have accomplished ALI 533154-04-2 before ALI 533154-10-1 was issued. We believe that the interval point for these aircraft should also take into account the case that ALI 533154-04-2 had been executed.

EASA response:

- A. Comment agreed. See EASA response to Comment #2.**
- B. Comment agreed. The final AD was updated accordingly.**

Commenter 4: Delta Air Lines – David Lashansky – 25/03/2024**Comment # 4**

Reference: /A/ EASA Proposed Airworthiness Directive: PAD No. 24-035, dated 19 March 24

Commenter Request

Add a grace period to Table 1 and Table 2 of the PAD (Ref /A/) for CEO and NEO A/C that will be due for the DVI and NDT inspections at the same time as the EASA AD is expected to be published.

Furthermore, provide clarity to what revision level can be used for taking credit for previous accomplishments of SB A320-52-1195 and A320-52-1196 prior to the effective date of the AD.

Request justification

The current threshold and repetitive intervals are 2250 FC and 3000 FC per para (1) and para (2) of Ref /A/.



For operators with large fleets (such as DAL), there will be A/C which will become due for the repetitive DVI and NDT inspection at the same time as the EASA AD is expected to be released.

There is currently no grace period built into Ref /A/ and, therefore, all these A/C will be required to do the inspections per SB A320-53-1195 Revision 11 / SB A320-53-1196 Revision 10 (or later revisions) immediately after the AD effective date (ADED). There is no grace period for operators to incorporate the latest revisions of the SB once the EASA AD has been published.

Furthermore, there are many NEO A/C currently tracking the ALI 533154-03-2 / 533154-10-01 inspections which will be due for the ALI inspections at the same time as the EASA AD is expected to be released. There is currently no grace period built into Ref /A/ and, therefore, from the ADED, the NEO A/C which are scheduled to perform the ALI tasks will no longer be able to accomplish these inspections and will be required to immediately perform the inspection per SB A320-53-1195 Revision 11 / SB A320-53-1196 Revision 10 (or later revisions). There is no grace period for operators to remove these NEO A/C from ALI task effectivity and add these A/C to the effectivity of the AD mandated SB inspections.

Furthermore, Table 1 and Table 2 of the PAD (Ref /A/) provides clarity regarding SB A320-52-1325 and A320-52-1326 that any revision of the SB is acceptable to take credit for prior accomplishments. However, no such clarification exists for SB A320-52-1195 and A320-52-1196. Clarity should be provided to operators that credit can be taken for prior accomplishments of the SB inspections at any revision level.

List paragraphs that change; describe (nonobvious) changes

Definitions:

For Table 1 and Table 2 within the PAD (Ref /A/), clarify the use of Airbus SB revision level and add a grace period of “500 FC from ADED” as an additional option as follows:



Table 1 – PAD 20-034 Compliance Time

Aeroplanes	Thresholds (whichever occurs later)
CEO	<p>3 000 FC since aeroplane first flight or 3 000 FC since initial installation of that door actuator fitting as per RI R533-70501 or 2 250 FC since last inspection of that door actuator fitting, accomplished before the effective date of this AD, in accordance with the instructions of Airbus SB A320-52-1195 (any Revision) or 1 500 FC since 18 July 2021 [the effective date of EASA AD 2012-0118] or 500 FC after the effective date of this AD</p>
NEO	<p>3 000 FC since aeroplane first flight or 3000 FC since initial installation of that door actuator fitting as per RI R533-70501 or 2 250 FC since last inspection as per ALI 533154-03-2, or in accordance with the instructions of Airbus SB A320-53-1325 (any Revision), whichever occurs later or 500 FC after the effective date of this AD</p>

Table 2 – PAD 20-034 Compliance Time

Aeroplanes	Thresholds (whichever occurs later)
CEO	<p>3 000 FC since aeroplane first flight or 3000 FC since initial installation of that hinge fitting as per RI R533-70500 or 3 000 FC since last inspection of that hinge fitting, accomplished before the effective date of this AD, in accordance with the instructions of Airbus SB A320-53-1196 (any Revision) or 1 500 FC since 18 July 2021 [the effective date of EASA AD 2012-0118] or 500 FC after the effective date of this AD</p>
NEO	<p>3 000 FC since aeroplane first flight or 3 000 FC since last inspection as per ALI 533154-10-01, or in accordance with the instructions of Airbus SB A320-53-1326 (any Revision), whichever occurs later or 3000 FC since initial installation of that hinge fitting as per RI R533-70500 or 500 FC after the effective date of this AD</p>



EASA response:**Comment not agreed.****A grace period will not be added to the AD. The superseded AD 2012-0118 already incorporated the now required intervals.****“(any revision)” does not need to be added after the subject SBs in table 1 and table 2, as the wording currently offers credit for all previous revisions.****Commenter 5: EVA AIR – Johnson Lo – 29/03/2024****Comment # 5**

In PAD 24-035, there are some typos need to be corrected:

Page 3, Table 1 – Compliance Time, threshold for CEO aeroplanes,

- Item 1 was “... Airbus SB A320-52-1195 ...”, should be “... Airbus SB A320-53-1195 ...”
- Item 2 was “1 500 FC since 18 July 2021 [the effective date of EASA AD 2012-0118]”, should be “1 500 FC since 18 July 2012 [the effective date of EASA AD 2012-0118]”

Page 4, Table 2 – Compliance Time, threshold for CEO aeroplanes,

- Item 3 was “1 500 FC since 18 July 2021 [the effective date of EASA AD 2012-0118]”, should be “1 500 FC since 18 July 2012 [the effective date of EASA AD 2012-0118]”

EASA response:**Comment agreed.****See EASA response to Comment #2.**

Commenter 6: Jetstar – Yejin Kim (Alicia) – 04/04/2024 & 17/04/2024
Comment # 6
04/04/2024

Regarding our ongoing investigation pertaining to this issue, we are eager to delve into the detailed background of this publication. We would greatly appreciate it if you could confirm the appropriate contact points for discussing this matter.

17/04/2024

- 1) Firstly, we understand that the purpose of the EASA AD/PAD, adopted by the Agency, mandates actions to be performed on an aircraft to restore an acceptable level of safety when evidence suggests that the safety level of the aircraft related to Airworthiness defect may be compromised.
- 2) We acknowledge the mandatory advice recently proposed by EASA publication, superseding EASA AD 2012-0118 dated 04 July 2012, outlining the purpose of the AD, which encompasses the affected area corresponding to the advised modification as a terminating action for repetitive inspection requirements.
- 3) As this issue was rooted in contributing factors of design and maintenance origin, the recent EASA publication instruction encompassing the advised SB, expanding the Applicability to the NEO fleet as an introduced terminating action, aims to correct a current inherent design defect which could lead to in-flight detachment of a MLG door, potentially resulting in damage to the aeroplane to address this potential unsafe condition.

EASA response:
Comment noted.

EASA is not in the position to provide further information on the background of this publication. All necessary information is incorporated in the reason paragraph of this AD and/or in the relevant SBs, as published by the TC holder.

Commenter 7: Deutsche Lufthansa AG – Florian Schmucker – 12/04/2024


Comment # 7

DLH has reviewed the PAD 24-035 and would like to highlight the following comments.

The PAD describes in credit paragraph (8) and (9) that ALI task 533154-03-2 and ALI task 533154-10-1 will be superseded if inspections and corrective actions as required by SBs are accomplished.

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(7) Repair and accomplishment of post repair instructions, as applicable, as defined by paragraph (6) of this AD, does not constitute terminating action for the repetitive inspections as required by paragraphs (1) and (2) of this AD for that repaired area, unless specified otherwise in the instructions provided by Airbus.

(8) For NEO aeroplanes: From the effective date of this AD, accomplishment of inspections and corrective actions on an aeroplane as required by paragraphs (1) and (3) of this AD supersedes ALI task 533154-03-2 for that aeroplane.

(9) For NEO aeroplanes: From the effective date of this AD, accomplishment of inspections and corrective actions on an aeroplane as required by paragraphs (2) and (3) of this AD supersedes ALI tasks 533154-10-1, for that aeroplane.

DLH understands that the ALI tasks will be superseded only if the inspections AND the corrective actions are performed together both. But corrective actions are only required if any discrepancies are found during inspection. We believe that performing the inspection per paragraph (1) and (2) (regardless if corrective actions are performed or not) should supersede the ALI tasks.

Therefore DLH requests EASA to revise the connection wording between inspections and corrective actions to supersede the ALI tasks.

EASA response:

Comment agreed.

The AD was revised accordingly.

