

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-046

[Published on 25 April 2024 and officially closed for comments on 23 May 2024]

Commenter 1: Deutsche Lufthansa AG – Martin Siring – 02/05/2024

Comment # 1

- A. Can you please clarify the discrepancy between SB statement (“Only on A319 CEO aircraft Pre-MOD No. 160001J3282 and Pre-MOD No. 160080J3705, this Service Bulletin is expected to be classified Mandatory (...)”) and proposed AD, which refers to corporate jet modifications 28238, 28162 and 28342?
- B. We request to add an additional paragraph regarding a terminating action of the modification performance for the new ALI tasks 534141-02-2 and 534142-02-2.

EASA response:

- A. Comment agreed. The Applicability of the AD has been updated accordingly.**
- B. Comment agreed. Paragraph (2) was added in the AD.**

Commenter 2: Delta Air Lines – Vance Mitchell – 23/05/2024

Comment # 2

Reference:

- (A) EASA Proposed Airworthiness Directive: PAD No. 24-046, dated 25 APR 24
- (B) Airbus Service Bulletin (SB) A320-53-1517, dated 12 DEC 23

Comment A

Modify Ref (A) PAD, Required Actions section, to add an Inspection paragraph.



Request justification

The modification of the potable and waste water service panels via Ref (B) is conditional of findings during the inspection of the fastener holes in the area. If there is a finding, operators are to contact Airbus for further instructions and the modification cannot be completed. In addition, completing the inspection of the holes before exceeding 56800 FC from aircraft first flight should satisfy the conditions of the SB, since findings would prompt alternate repair from Airbus that would satisfy the modification requirement.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s):

- Add “Inspection” required action, applying the “56,800 FC since aircraft first flight” initial threshold limit to the statement.

Comment B

Modify Ref (A) PAD, Required Actions section, to add a Corrective Action(s) paragraph.

Request justification

The modification of the potable and waste water service panels via Ref (B) is conditional of findings during the inspection of the fastener holes in the area. If there is a finding, operators are to contact Airbus for further instructions and the modification cannot be completed.

In respect to Comment #1, if there is an Inspection paragraph added, there also should be a Corrective Actions paragraph that mandates contacting Airbus for repair instructions, and to accomplish those instructions accordingly within the compliance times specified in the AD.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s):

- Add “Corrective Action” paragraph mandating operators to contact Airbus for approved repair instructions if, during the SDI of the fastener holes in the area, any cracks are detected.

Comment C

Modify Ref (A) PAD, Required Actions section, to add an “ALI Tasks Supersedure” paragraph.

Request justification

Within Ref (B) “Summary” Section B.(3), one of the advantages of completing this modification is the cancellation of the requirements of the new ALI Task references 534141-02-X and 534142-02-X. Since this can be considered as an informational statement, there should be a requirement in Ref (A) for the mentioned ALI Tasks to be cancelled if the inspection is completed.

List paragraphs that change; describe (nonobvious) changes

Required Action(s) and Compliance Time(s):



- Add “ALI Task Supersedure” paragraph

Comment D

Modify Ref (A) PAD, Definition section, to add “Required for Compliance” (RC) clarification for Ref (B).
 Modify Ref (A) PAD, Definition section, to add “Required for Compliance” (RC) clarification for Ref (B).

Request justification

Ref (A) mandates use of Ref (B) to accomplish the inspection/modification of the potable and waste water service panels. However, Ref (B) does not include a note that clarifies what paragraphs are considered “RC”. Therefore, Ref (B) can be considered as required for compliance in its entirety. By adding this statement, it will give operators a concise understanding of what steps must be complied with and what steps are recommended, done as part of other actions, or done with accepted methods different from those given in the listed instructions.

List paragraphs that change; describe (nonobvious) changes

Definition

- Add note that defines “Required for Compliance” with respect to “refer to” vs “in accordance with” statements.

EASA response:

- A. Comment not agreed. The inspection paragraph was not added into the AD to simplify the AD. The modification includes the inspection and potential corrective actions, so the inspection and corrective action is inherent with the modification and does not need to be mentioned specifically in the AD. Note 1 of the AD provides further information and clarification, what is included in the modification requirement.***
- B. Comment not agreed. See answer to A.***
- C. Comment agreed. See answer to Comment 1 B.***
- D. Comment partially agreed. EASA requires modification as described in paragraph (1) of the AD. The SB requires, as one of the steps of the modification, an inspection and potential corrective action, depending on the findings (as clarified in Note 1 of the AD). The modification is required by EASA and all the steps connected to this modification in the SB have to be performed. See new paragraph 2 of the AD.***

The final AD has been updated accordingly in response to that comment.

