

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-098

[Published on 31 July 2024 and officially closed for comments on 28 August 2024]

Commenter 1: Jetstar Airways – Cheng Joo Tan – 08/08/2024

Comment # 1

Regarding PAD 24-098, the related inspection SB 52-1203-00 does not cover the same detail as covered in the PAD (i.e. affected latch bracket and OWED part numbers).

Is AIRBUS planning to revise SB 52-1203-00 to either:

- include the detail provided in the PAD (or AD),

or

- bring the SB effectivity down to component level?

I note that the ISB effectivity is already limited to aircraft pre-MOD 168741.

EASA response:

EASA has been advised by AIRBUS that the SB is not planned to be revised at component level. The SB applicability is based on approved configuration at time of individual MSN delivery.

The AD takes into consideration the possible swap of affected parts even the AIRBUS modification 168741 is one way.

No change has been made to the final AD in response to that comment.



Commenter 2: American Airlines – Ben Niaki – 14/08/2024**Comment # 2**

American Airlines (AAL) reviewed EASA PAD 24-098 and would like to make a comment regarding the Corrective Action Paragraph (2) and Terminating Action Paragraph (3).

Paragraph (2) states that if there are discrepancies during the inspection of migrated bushings in both activated and deactivated Overwing Exit Door (OWED), to accomplish the corrective actions in accordance with Modification SB A320-52-1204 Rev 00. Paragraph (3) of the PAD states that modifying the aircraft in accordance with Modification SB A320-52-1204 Rev 00 terminates the repetitive inspection requirements in Paragraph (1). SB A320-52-1204 Rev 00 requires the accomplishment of the return to service tests in paragraph 3.E. For each of the 4 OWEDs, the SB requires accomplishing the operational check of the OWED mechanism, referring to AMM 52-22-00-710-803. Airbus confirmed to AAL that this AMM section is only applicable to activated OWEDs, and that operational checks are not required for the deactivated doors. AAL has the aft OWEDs deactivated on the applicable aircraft.

AAL requests EASA adjust the AD to remove the requirement of performing the operational tests in Section 3.E of Modification SB A320-52-1204 on the deactivated OWEDs of affected aircraft. Operational tests in section 3.E of the Modification SB should be accomplished only for activated OWEDs.

AAL believes this is an equivalent level of safety as the deactivated doors are not operational for emergency egress. In addition, Airbus has indicated to AAL that there are no AMM sections for performing operational tests on deactivated OWEDs.

EASA response:

EASA has been advised by AIRBUS that the AMM task has been revised to address deactivated OWD configuration.

No change has been made to the final AD in response to that comment.



Commenter 3: Interglobe Aviation Limited (Indigo) – Debapriya CHATTERJEE – 28/08/2024**Comment # 3**

Our comment is with regard to para 2:

Quote:

Corrective Action(s):

(2) If, during any inspection as required by paragraph (1) of this AD, discrepancies, as defined in the ISB, are detected, before exceeding 11 000 FC since aeroplane first flight, or since the previous inspection without findings, whichever occurs later, accomplish the corrective actions in accordance with the instructions of the MSB. Unquote:

Our Comments: An example, if aircraft has performed first inspection as per ISB at 6000 FC and *there is a finding / discrepancy*, are the corrective actions to be performed at 17,000 FC (6000 FC+11000 FC) OR is it before 11 000 FC since aeroplane first flight.

The PAD is not clear on corrective action on the MSB for the next threshold when there is finding / discrepancy.

EASA response:

Comment noted. In the exemplary case the corrective action has to be beformed before exceeding 11 000 FC since aeroplane first flight.

For explanatory reasons please see following example:

An Aircraft currently has 25 000 FC. The last inspection without findings was performed at 20 000 FC. At the newest inspection (e.g. at 25 000 FC) there is a finding. The corrective action has to be done in this case before exceeding 20 000 FC (the last inspection without finding) + 11 000 FC = 31 000 FC.

