

COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-114

[Published on 30 September 2024 and officially closed for comments on 28 October 2024]

Commenter 1: Turkish Airlines – Hasan Aksüt – 01/10/2024

Comment # 1

PAD 24-114 is listed as ATA 53. However, the referenced publications, namely Airbus Service Bulletins A320-25-1CFU and A320-25-1CFV, are listed as ATA 25.

This complicates the workflow and makes it difficult to keep track for CAMOs that have engineering departments based on ATA chapters.

Can you consider aligning the chapters for future AD's and if possible including this AD?

EASA response:

Comment agreed. ATA chapter was changed in response to that comment.

Commenter 2: Rulers Flight Sharjah – Richard McCall – 02/10/2024

Comment # 2

Can you please advise as to why we have a calendar limit quoted on SB 25-1CFU?

The compliance time and nature of this defect leads me to think this is a high cycle/ hours issue. Yet it states this inspection is needed 72 months from first flight (in our case) and with a 36-month grace, with a subsequent 72 month Interval.

Our current hours and cycles 2338 hours and 673 cycles after 9 years. The SB states the inspection must be done before 15,000 FC or 30,000 FH, again leading me to believe its a high cycle and Hour issue.

Surely the calendar compliance time aspect should be looked at further by airbus as we will be pulling apart low hour and cycle structure for a seemingly high cycle and hour issue?



Can this deformation happen under static conditions, if so can you please advise how?

We are a corporate jet with and 150-190 FC and 500FH annual utilization per its OMP. (1.3 Hrs a day and 0.5 of a cycle a day)

I would like to advise that I was present at the ACJ Low utilization Maintenance Program forum in TLS and can see this calendar threshold and interval will be contrary to what the goal of the LUMP is for low utilization operators.

I also see that EASA has a PAD 24-114 in force and i would hope that Airbus will consider the above in the consultation phase with EASA? (I will also consult with EASA on the topic.)

EASA response:

Comment noted. The Compliance time is based on normal aeroplane pax utilisation. In the European system, deviation from the action required by an AD should be managed through the AMOC process or it can be applied for an exemption from the ADs compliance time in accordance with the Basic Regulation Article 71. Please check following links:

<https://www.easa.europa.eu/en/the-agency/faqs/alternative-method-compliance-amoc-airworthiness-directive-ad>

<https://www.easa.europa.eu/en/the-agency/faqs/airworthiness-directives-ads#:~:text=For%20an%20aircraft%20registered%20in,accordance%20with%20Basic%20Regulation%2C%20Article>

Commenter 3: EVA AIR – Johnson Lo – 04/10/2024

Comment # 3

The EASA PAD 24-114 is classified in ATA 53.

However the related Inspection SB A320-25-1CFU is ATA 25; the subject damaged parts “vertical member D25510xxx00000” are in IPC ATA 25-51-xx; the related inspection AMM are also in ATA 25-54-xx.

EVA is asking why this PAD is in ATA 53? Not in ATA 25?

In addition, if this PAD can be classified in ATA 25, it will helps operators a lot. Because this AD and related ISB can be evaluated by the same person/group/team, rather than transferred by several hands.

EASA response:

See Comment 1.



Commenter 4: Jetstar Airways Pty Limited – Kevin Chen – 07/10/2024**Comment # 4**

JST would like to query if any inspections performed per A320-25-1CFU or A320-25-1CFV before the issuance of the eventual AD effective date can be taken credit for PAD Para (1)?

EASA response:

Comment noted. Please refer to:

“Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished:”

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

Commenter 5: Spirit Airlines – Victor Roman – 11/10/2024**Comment # 5**

Regarding the subject PAD and the related SBs, the instruction calls for a records review to see if the area has been repaired IAW RDAF or SRM. NKS understands that we can take advantage of using the records before the inspection and applying the given SRI to the AC that have already done SRM repairs without having to inspect the area. However, records are often old and not easy to find, and it is understood that a DVI would show any repairs done in the area given the original part measurements and condition.

NKS would like to request if in lieu of searching for aircraft records before performing the inspection, it would be acceptable to go directly to the inspection and do a visual check for any repairs. From there we could determine what the corrective action would be as per SB. If this is possible, would it be possible to add it to the official AD when it comes out and maybe in an SB revision?

EASA response:

Comment noted. The AD requires an inspection followed by possible corrective actions and reporting. If the records can not be checked or are not available, do the inspection as per paragraph 1 of the AD. If during the inspection as required by paragraph (1), discrepancies are detected, as identified in the SB, the applicable corrective actions in accordance with the instructions of the SB have to be accomplished. In case there are



discrepancies not identified in the SB, please contact Airbus and accomplish those instructions accordingly. No change has been made to the final AD in response to that comment.

Commenter 6: Airbus India Private Limited – Ramdeepak Nadar – 24/10/2024

Comment # 6

As per SB A320-25-1CFU & A320-25-1CFV, compliance timeline mentioned at a threshold of "Before accumulation of 15000 FC or 30000 FH or 72 months from EIS (whichever occurs first) and with a grace period of 36 months after effective date of AD:

- A. But due to above compliance timescale, we have many A/C which have exceeded the initial threshold and are running overdue. What action customer has to take in this cases?
- B. In a scenario as per the abovementioned compliance timescale, if any A/C where the compliance is coming due within very short interval (i.e. less than 100/200FC). What action customer has to take in this cases?
- C. When EASA AD will be issued?

EASA response:

Comment noted.

- A. The threshold is defined by 2 conditions A and B whichever occurs later between both. Therefore the 36 months from AD effective date applies for TH being exceeding or close to be exceeding.***
- B. See answer to point A.***
- C. The CRD will be published together with the final AD. EASA is keen on publishing the final AD as soon as possible after the PAD consultation period has finished.***

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

Commenter 7: Airbus Group India Pvt. Ltd – Ramdeepak Nadar – 22/10/2024



Comment # 7

This is with reference to SB A320-25-1CFU/25-1CFV.

As per RIL SA25M24000908 R00, we understand that the material is chargeable and manhours not compensated. We are aware that these SBs will be mandated by an EASA AD.

Since AD is going to be issued which means that this issue is related to safety, due which VTI seeks clarification on below:

- A. Since the issue is safety concern , VTI would like to know why RIL support is chargeable. Please justify?
- B. VTI would request to provide manhour compensation and FOC material incase of findings (Repair not possible)?
- C. Can Airbus provide FOC material in advance to support this inspection program?
- D. If findings and repair not possible, replacement of the fittings are to be made, we would like to know the turn around time (lead time) to source this fittings?

Additionally we would like to know in case an A/C is due in short interval from now and since these inspections can be performed only during the heavy maintenance, do we have any grace period for this SB compliance?

EASA response:

Comment noted. EASA is not in position to reply to those questions. We suggest to contact Airbus for further information.

