

## COMMENT RESPONSE DOCUMENT

EASA PAD No. 24-124

[Published on 21 October 2024 and officially closed for comments on 18 November 2024]

**Commenter 1: Air New Zealand – Mark Pritchard – 30/10/2024**

### Comment # 1

EASA PAD No.: 24-124 makes numerous references to SRM tasks at a specific revision status (Revision 26). This revision seems to be based around the Feb 2024 SRM revision status with a change in subsequent revisions.

The A321Neo ACF ST8 model shows at revision 26 in Feb 2024 with the A321Neo ST6 being at revision 32, along with other models at differing revisions, ANZ are concerned that this PAD does not clearly define the aeroplane model and relates SRM Task revision status within the document.

(The reference of an SRM revision date or a table of Model v Revision status for a specific point in time would provide clarity to SRM Task related changes).

Reason section: For the reasons described above, this AD retains the requirements of EASA AD 2024-0027, which is superseded to prohibit the use of deactivated tasks and allows the use of SRM task 57-21-11-300-009 at Revision 27 or later.

#### 1. Additional Requirement(s) for SRM Repairs:

Para (5) For Group 1 A321 NEO (does this include the A321 NEO ACF?) aeroplanes on which, before the effective date of this AD, SRM tasks 57-21-11-300-009 or 57-21-11-300-010 have been embodied and which included Steps 2 to 9 (inclusive) for bush installation:

Within 3 months after 08 February 2024 [the effective date of EASA AD 2024-0027], contact Airbus for approved repair instructions and, within the compliance time specified therein, accomplish those instructions accordingly (see Note 1 of this AD).

Note 1: The SRM task 57-21-11-300-009 and 57-21-11-300-010 until (and including?) Revision 26 dated February 2024 identified the bush oversizing in the Steps as shown in A321NEO SRM Task 57-21-11-300-009 Figure 001, Sheet 1.

2. Para (6) For Group 1 aeroplanes not affected by paragraph (5) of this AD on which, before the effective date of this AD, SRM tasks 57-21-11-300-002, 57 21-11-300-003, 57-21-11-300-009, 57-21-11-300-010, 57-21-11-300-021, 57-21-11-300-022, Revision 26 or earlier or 57 21-11-300-025 have been embodied, in lieu of the thresholds and intervals specified in the applicable SRM tasks, accomplish the post-repair inspections of the affected areas in accordance with the instructions of the AOT within the thresholds and intervals as defined in Appendix 1 of this AD, as applicable to



aeroplane model and configuration. (This grouping contains a large selection of models with each being at a different revision status based on any amendment to specific SRM Tasks at a specific point in time).

3. Para (7) Similar issue.

ANZ would like to see clarification of the specific Model / Standard / SRM Revision Status @ required timeline (Pre/Post Feb 2024 SRM Update).

A321Neo ACF ST8 @ Feb 2024 was revision 26

A321Neo ST6 @ Feb 2024 was revision 32

A320Neo ST5 @ Feb 2024 was revision 39

A319Neo ST7 @ Feb 2024 was revision 22

A320Ceo ST1 @ Feb 2024 was revision 148

**EASA response:**

**Comment partially agreed.**

**(1) The A321 NEO ACF is included in an A321 NEO aeroplane. ACF is a commercial naming. Those models are listed in the applicability under "NX" as listed in the NEO model definition.**

**(2) The AD was updated accordingly and only refers to the date of the publication of the Revision.**

**(3) The AD was updated accordingly and only refers to the date of the publication of the Revision.**

**Commenter 2: Spring Airlines Co.,Ltd. – Zhou Jianhai – 13/11/2024**

**Comment # 2**

During review the EASA PAD 24-124, Spring Airlines (CQH) finds there could be a typo in para (5) of the subject PAD as marked yellow as below:

**Additional Requirement(s) for SRM Repairs:**

- (5) For Group 1 A321 NEO aeroplanes on which, before the effective date of this AD, SRM tasks 57 21-11-300-009 or 57-21-11-300-010 have been embodied and which included Steps 2 to 9 (inclusive) for bush installation:  
Within 3 months after 08 February 2024 [the effective date of EASA AD 2024-0027], contact Airbus for approved repair instructions and, within the compliance time specified therein, accomplish those instructions accordingly (see Note 1 of this AD).



In CQH's understanding, the 3 months should be 5 months, which should match the EASA AD2024-0027 Para (5) as shown below:

- (5) For Group 1 A321 NEO aeroplanes on which, before the effective date of this AD, SRM tasks 57-21-11-300-009 or 57-21-11-300-010 have been embodied and which included Steps 2 to 9 (inclusive) for bush installation:  
Within 5 months of the effective date of this AD, contact Airbus for approved repair instructions and, within the compliance time specified therein, accomplish those instructions accordingly.

If the compliance time changes to 3 months after 08 February 2024 [the effective date of EASA AD 2024-0027], deviations will occur to the aircraft, which contacts Airbus for approved repair instructions and accomplish those instructions within 5 months, but more than 3 months I.A.W EASA AD 2024-0027, when the new AD is issued.

Request:

Could you please kindly review and advise if above understanding is correct? If not, please advise.

**EASA response:**

***Comment agreed. The compliance time was changed from 3 to 5 months, to align it with EASA AD 2024-0027.***

**Commenter 3: EVA AIR – Michael Chuang – 08/11/2024**

### Comment # 3

According to PAD 24-124 Additional requirement(s), the restriction of SRM task usage is mentioned.  
EVA would like to query for the source of the SRM Revision, since the deviation is huge with current SRM Revision.



**A321****STRUCTURAL REPAIR MANUAL**

PAD content

**Additional Requirements for Future Repair(s):**

- (7) For Group 1 aeroplanes: From the effective date of this AD, do not accomplish a repair in accordance with the instructions of SRM tasks 57-21-11-300-002 **Revision 26 or earlier**, 57-21-11-300-003 **Revision 26 or earlier**, 57-21-11-300-009 **Revision 26 or earlier**, 57-21-11-300-010, 57-21-11-300-021, 57-21-11-300-022 **Revision 26 or earlier**, or 57-21-11-300-025.

SRM

ENV

Revision date: Nov 01/24

Revision number: 151

**EASA response:****Comment agreed.****See answer to comment #1.**