



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-029

[Published on 24 February 2016 and officially closed for comments on 23 March 2016]

Commenter 1: Deer Jet – Song Shen – 25/02/2016

Comment # 1

In paragraph (4) of this AD, “For an AMP that, on the effective date of this AD, is already updated to incorporate the maintenance tasks as specified in ALS Part 2 at Revision 03,” I think there is a mistake, it should read: “For an AMP that, on the effective date of this AD, is already updated to incorporate the maintenance tasks as specified in ALS Part 2 at Revision 04,”. Because if it is Revision 03, for this AMP, we also have to revise in order to comply with paragraph (1), and this paragraph (4) has no meaning of existence.

EASA response:

Comment not agreed. The AD requires, from the AD effective date, the accomplishment of the tasks as defined in the latest ALS (AD paragraph 1), as also, within 12 months after the AD effective date, updating the AMP (AD paragraph 3). AD paragraph (4) gives credit for the AMP updating, as required by paragraph (3), clarifying that, for an AMP already updated to a certain ALS standard, only a limited update is adequate to accomplish the requirement of AD paragraph (3).

We suggest referring to the [3rd AD workshop proceedings](#) – for a complete presentation on the AD ALS structure.

No changes have been made to the Revised PAD in response to this comment.

Commenter 2: Alitalia – Sergio Gioia – 25/02/2016

Comment # 2

Regarding this PAD, I kindly ask, if it is possible to know the proposal effective date of further AD, to understand the compliance time of ALS Part 2 rev 4.

Based on available info we will have 14 days after AD issue (except as stated in special compliance time). We expect that this date will not more restrictive of June 02, 2016 (compliance time of variation 3.3). Please also note that variation 4.2 does not show AMM to perform tasks, if any.

ALS Part 2 Revision 04 includes 8 Variations Only variation 3.3 has been already published prior to Rev 4. Into ALS part 2 Rev 4 no further technical changes are introduced.

Variation 3.3 gives compliance time to introduce new or revised items into operator maintenance program by June 02/2016. Also per section compliance, the maintenance tasks in section 3 shall be accomplished within June 02/2017 (except special compliance time) It's appears clear that the first stage is the revision of



AMP and the second stage is comply with it (not same in the PAD).

In PAD also seems that we need to perform new o more restrictive tasks as per ALS part 2 rev 4, without compliance time but at effective date of AD (except tasks with special compliance time). Please note that some tasks (not part of special compliance time and not included in Variation 3.3) needs a compliance time to be performed without impact on operations specially with large and old fleet.

We kindly ask you to think about appropriate compliance time in the AD para (1) “required action” that could be not more restrictive than June 02/2016 for AMP and within June 02/2017 to accomplish new o more restrictive tasks.

EASA response:

Comment not agreed. The AD requires updating the AMP within 12 months after the AD effective date and, from the AD effective date, the accomplishment of the tasks, as specified in the ALS (Part 2 revision 5). In accordance with AD paragraph 1 (“within the thresholds and intervals as defined in the ALS”), the specific compliance time for any single task is the compliance time as defined in the ALS, and not the AD effective date.

It should be noted that a task, that is mandated by an AD, must be accomplished, within its compliance time, even if not yet included in the AMP.

No changes have been made to the Revised PAD in response to this comment.

Commenter 3: Air Canada – Dale A. Zikman – 26/02/2016

Comment # 3

In PAD 16-029, “NOTE 3” on page 2 of 3, states that “The inspection requirements of Tasks 534129 and 534130 are superseded by EASA AD 2016-0015, as applicable to aeroplane configuration.”

ACA considers this statement as incorrect considering that AD 2016-0015 supports the frequencies as found listed in SB A320-53-1288 Rev 00 in SB Appendix 02, on page 1, Figure A-SABAA Sheet 01, where:

- 1) For the AFT PAX/CREW Door Cutout Inspection at FR 66, the A321 Pre 160001 Threshold is 42300 FC, and the Interval is 8800 FC.
 - a) But in the ALS PART 2 Revision 04 document (that this Proposed AD is to address) the associated Task 534129-01-4 lists a more restrictive Threshold of 34500 FC and a less restrictive Interval of 17000 FC.
- 2) For the AFT PAX/CREW Door Cutout Inspection at FR 68, only the single common “A321” is listed with a Threshold of 39300 FC and Interval of 8500 FC.
 - b) But in the ALS PART 2 Revision 04 document (that this Proposed AD is to address) the A321 is broken down into two associated Tasks, one with a differing Threshold and Interval:
 - 534130-01-4 for A321 Classic Wing with a more restrictive Threshold of 17600 FC and less restrictive Interval of 13600 FC,
 - 534130-01-6 for A321 Modified Wing with Threshold and Interval the same as SB 53-1288.

These differences between the SB 53-1288 and ALS Part 2 Rev 04 lead to confusion as to what values the Operator are supposed to use when amending their



Approved AMP.

Given this, ACA requests that the release of this AD must indicate that there is a difference in the documents, what those differences are, and to more clearly stipulate which document and Threshold / Interval values are valid.

EASA response:

Comment partially agreed. A new AD, superseding EASA AD 2016-0015, will be issued, providing the applicable compliance time. ALS tasks 534129 and 534130 have been removed from ALS Part 2 at revision 5. The Note addressing these task (was Note 3 in the original PAD) has been removed in the modified PAD.

Commenter 4: Cathay Pacific Airways Limited – Aine Cloney – 29/02/2016

Comment # 4a

In response to PAD 16-029 Cathay Pacific would like to question the following:

- Section (4) “Credit”

Please can you clarify the intent of this section?

My simplified understanding is as follows:

“if your AMP complies with ALS Part 2 Rev 3 on the effective date of this AD:

- It’s ok to accomplish the new tasks per ALS Part 2 Rev 4 or Variation 4.2.
- It’s ok to accomplish existing tasks at the lower thresholds per ALS Part 2 Rev 4 or Variation 4.2.
- It’s ok to add the new tasks, from ALS Part 2 Rev 4 or Variation 4.2, to your AMP.
- It’s ok to change tasks, which have been made more restrictive per ALS Part 2 Rev 4 or Variation 4.2, to your AMP.”

This interpretation of the paragraph calls into question the use of this paragraph, what does it require/provide?

The language used is, in my opinion, quiet legal and unapproachable, lacking in consideration for the end user who must adhere to the guidelines.

Comment # 4b

- ALS Part 2 Variation 4.2 which is also to be mandated through this AD.

This variation includes 14 new tasks.

Per the intent of this AD these task must be added to our AMP.

These tasks have not been issued in the MPD/MRBR, they do not have any AMM references or any other form of work instruction.

Therefore we cannot add them to our AMP as they are markers with no instructions.



Comment # 4c

· This AD mandates a variation to an ALS revision at the same time as mandating the ALS revision. Is this a new policy which we will see more of moving forward? Please consider our comments/feedback, as an operator we would like to highlight the delicate nature of ALS Parts and wish to work with Airbus and EASA to ensure there is no misinterpretation.

EASA response:

Comment #4a: EASA confirm your interpretation is correct. We suggest referring to the [3rd AD workshop proceedings](#) – for a complete presentation on the AD ALS structure.

Comment #4b:

AIRBUS informed EASA that the notification mail of ALS Part 2 Variation 4.2 already contains the list of ICAs for the new and revised tasks. Variation 4.2 tasks are now included in ALS Part 2 REV5 and published into MPD REV42 (showing the AMM/NTM references) in June 2016. Contact AIRBUS for further information as necessary

Comment #4c: Comment noted. EASA confirm that mandating an ALS revision concurrently with a variation applicable to that ALS revision will not be the preferable approach; anyway, it cannot be excluded that similar ADs will be issued.

No changes have been made to the Revised PAD in response to this comment.

