

**EASA PAD No. 06 - 217**  
**COMMENT RESPONSE DOCUMENT**  
**[comment period closed on 03 October 2006]**

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Applicability	<p>The compliance paragraph of Page 2 states that , "unless already accomplished, within the next 20 months after the effective date of this AD, perform a detailed visual inspection of the wing tank dry bay and corrective actions in accordance with Airbus A320-57-1121..."  This SB is not applicable to any aircraft MSN greater than MSN 563.</p> <p>The applicability paragraph on Page 1 states that any A319, A320, A321 aircraft that have had ZL-540-02 &amp; ZL-640--02 zonal inspection carried out previous to AMM 05-25-40 to August 2001 will require inspection. As the Interval for the Zonal inspection is set at 12 years approx 2,200 aircraft of the worldwide fleet will be applicable. These two statements seem to contradict each other.  BAW have a fleet of 67 aircraft of which 57 of them are MSN 1082 onwards and all under 7 years old. This means that 57 have not had Zonal insp ZL-540-02 &amp; ZL-640--02 as the interval is 12 years. However, none of these 57 aircraft are applicable to SB A320-57-1121. Please clarify the applicabilty of this PAD as this will cause confusion to a large number of operators who have comparatively low age aircraft in their fleet.</p>	Alan Woods British Airways Engineering	20/9/2006	<p>The applicability of the AD always prevails on the SB.</p> <p>The applicability paragraph only concerns A319, A320 and A321 aircraft on which zonal tasks ZL-540-02 and ZL-640-02 have <b>already been performed before the effective date of the AD</b>, and for which it cannot be confirmed that access panels were removed for inspection. That means that your 57 aircraft should not be concerned. The AD will be clarified accordingly.</p>
Compliance	<p>In order to maintain the Threshold of 12 years already reported on MRB R11 and to avoid to anticipate this inspection for our A/C within 20 months starting from the effective date of the AD, we would like to require to EASA and to AIB to modify, for A/C that haven't performed this inspection because they haven't reached the threshold limit of 12 years, the "Compliance" of the AD as follows:  Unless already accomplished, within 12 yeas starting from the delivery date or within 20 months after the effective date of this AD whichever occurs later, perform a detailed visual inspection of the wing tank dry bay and apply corrective actions in accordance with SB A320-57-1121.</p>	Airbus customer, comment received via Airbus	21/9/2006	To avoid any confusion, the applicability paragraph only will be updated, see above.