

**EASA PAD No. 07-173**  
**COMMENT RESPONSE DOCUMENT**  
**[officially closed for comments on 05 October 2007]**

PAD / DOC PARAGRAPH COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>PAD 07-173 Compliance Para 2 sub Para 2.3.1 states ..... 'or if a crack is found on the upper sheet (see Figure 3 Sheet 3 of SB A320-25A1555), repair or replace the lower central support before further flight I.A.W. SB A320-25A1555 or SB A320-25-1557.'</p> <p>The SB under 'E' Compliance mentions acceptable crack conditions for the upper sheet</p> <p>Quote '— If crack conditions are acceptable on the upper sheet, repair before 4,500FC, within 4,500FC repeat this inspection every 750FC.'</p> <p>Please clarify if <u>any</u> crack is acceptable or not in the upper sheet?</p>	<p>Peter Riddick</p> <p>Technical Engineer Airbus AMG</p> <p>British Airways Engineering</p>	25/09/2007	<p>We confirm that cracks on the upper sheet are not acceptable.</p> <p>If a crack is found on the upper sheet the lower central support has to be replaced before further flight.</p> <p>AIRBUS is to revise SB A320-25A1555 in line with AD requirements.</p>
Compliance	<p>References :</p> <ul style="list-style-type: none"> <li>- A). AIB ASB 320-25-A1555 Rev.00 on June 14th, 2007.</li> <li>- B). AIB ASB 320-25-1557 Rev.00 on June 14th, 2007.</li> <li>- C). AIB OIT 999.0071/07/VHR Dated June 22nd, 2007.</li> <li>- D). PAD N° 07-173 "Equipment / Furnishing - 80VU Rack Attachment - Inspection / Repair / Replacement".</li> </ul> <p><b>- 1). BACKGROUND:</b></p> <p>By receiving the ref. A). and B). Service Bulletin, Air France (AFR) has immediately performed the data collection according to the MRBR item ZL-127-01-1 "General Visual Inspection of rear avionics compartment". Base on 148 AFR A320 heavy maintenance events from 2004, no major findings have been recorded, :</p> <p><b>Lateral Fittings =&gt; 8 % findings</b> (no cracks, no broken parts have been found, only burred and ovalized part have been replaced).</p>	<p>Thanhhai Nguyen</p> <p>Engineering A320</p> <p>Air France</p>	04/10/2007	<p>EASA and AIRBUS have reviewed the suitability of the proposed threshold and repetitive inspection intervals, as resulting from the initial findings in service on the 80VU rack and the consequences on the safety of flight.</p> <p>Therefore the following revised compliance requirements will be introduced in Compliance section for AD issuance:</p> <p>Repetitive inspection of the 80VU rack <u>lower lateral fittings</u>:  §1.1. Prior to the accumulation of 24,000 Flight Cycles (FC) from the</p>

**Central Fitting (Pyramide)** => 3 % findings (also no cracks, no broken parts have been found, only burred and ovalized parts have been replaced).

Regist	Msn	HDV	CYC	LAND	80VU	Pyramid
F-GFKA	5	36570	35248	33362	lateral fittings replaced	
F-GGEE	16	33888	37726	36591	lateral fittings replaced	
F-GJVG	270	38042	28300	27974	lateral fittings replaced	
					lateral fittings replaced	
F-GHQC	44	34762	37683	36773	_80VU fittings manufactured from 7175	
					lateral fittings replaced	
F-GHQB	236	33775	28714	28562	_80VU fittings manufactured from 7175	Top replaced
F-GFKY	285	36168	22657	22423	lateral fittings replaced	AFT part replaced
F-GFKB	7	37353	35768	33859	lateral fittings replaced	
F-GFKZ	286	35626	22889	22408	lateral fittings replaced	
F-GHQM	237	30484	29496	29025	RAS	Top replaced
F-GHQO	278	28293	29853	29555	RAS	Top replaced
F-GHQP	337	29448	31636	30709	lateral fittings replaced	
F-GKXA	287	34598	26452	25686	lateral fittings replaced	

On the other hand, AFR Engineering has closely worked with AIRBUS in order to determine :

- different statement of ref. A ASB and subjected PAD.
- and the appropriated terminating actions for both fittings, (the ref. B SB do address only for the lateral fitting, for the Pyramide SB release is scheduled for beginning of 2008).

#### - 2). AFR FLEET STATUS :

Taking into account the ref. D PAD requirements; different deadlines; effective date (from June 14th, 2007 issue date of the inspection SB), and AFR daily average ratio, 68 A320 must be inspected within 45 days. This situation will considerably impact AFR A320 exploitation and can bring, on certain cases, a long AOG situation, as the corrective action is very work loaded.

#### - 3). AFR COMMENTS & DEMANDS:

In order to avoid critical situation and base on our positive findings (although inspection level of MRBR item ZL-127-01-1 is not the same than the one of AD), may we appeal to your kindness to :

3.a). Review the existing requirements of the ref D PAD and change the deadline "**750 FC after June 14th, 2007**" to "**750 FC after the**

first flight or within 500 FC after the effective date of this AD, which ever occurs later, perform a special detailed inspection of the 80VU rack lower lateral fittings using a boroscope, in accordance with the instructions given in SB A320-25A1555.

Repetitive inspection of the 80VU rack lower central support:  
 §2.1. Prior to the accumulation of 24,000 Flight Cycles (FC) from the first flight or within 500 FC after the effective date of this AD, which ever occurs later, perform a special detailed inspection of the 80VU rack lower central support using a boroscope, in accordance with the instructions given in SB A320-25A1555.

	<p><b>effective date of the upcoming AD",</b>  3.b). Depending on the main and severity factor (Flight Cycle),  "Customise" different deadline to each "age bracket" as following :  - For A/C &gt; 30000 FC=&gt; "750 FC after the effective date of the upcoming AD",  - For A/C with less than 30000 FC but more than 24000 FC=&gt; "1000 FC after the effective date of the upcoming AD".</p>			
Compliance	<p>PAD mandates the inspection prior to 24000FC from first flight or within 750FC after June 14, 2007 (effective date of SB A320-25A1555), whichever occurs later.  However, most of ANA A320/A321 fleet have already expired or will soon expire both periods stated above.</p> <p>2.  The worst case which may result in an inspection is to replace or repair the central support and lateral fitting BEFORE NEXT FLIGHT.  The total manpower needed for such replace or repair is so much, that cannot be completed at periodic C checks.  If we encounter the above worst case as a result of the inspection onto in-service aircraft, it means "AOG" to conduct repair/replacement.</p> <p>3.  The lead time for replace/repair kit shown in SB is all 90 days.  As SB was not "MANDATORY" when we received it, we have not yet even placed PO.  If we encounter the above worst case as a result of the inspection onto in-service aircraft, it means not only "AOG" but also that we cannot even start repair/replacement.</p> <p>4.  ANA A320/A321 is operated with high number of cycles (approx 6 or 7 flights per day).</p> <p><b>COMMENT</b></p> <p>We highly anticipate following scenario which will minimize the impact for flight operation;</p> <p>"Put PO and obtain Kits" takes 4 months.</p>	<p>Yukihiro Bunno</p> <p>Payload Engineering</p> <p>All Nippon Airways Co.,Ltd</p>	05/10/2007	Refer to comment above.

	<p>The interval of C check is 15 months.</p> <p>4 + 15 + margin = 20 months.</p> <p>Then, we strongly request you as follows;</p> <p><b>PROPOSAL 1 (priority 1)</b> Extend the compliance for inspection.</p> <p>CURRENT: 24000FC from first flight or within 750FC after June 14, 2007</p> <p>REQUEST: <u>Within 20 months after effective date of the AD (not SB)</u></p> <p>If this is acceptable, we can conduct both inspection and replace/repair at same maintenance chance at C Check.</p> <p><b>PROPOSAL 2 (if PROPOSAL 1 is not acceptable)</b></p> <p>Extend the compliance for inspection.</p> <p>CURRENT: 24000FC from first flight or within 750FC after June 14, 2007</p> <p>REQUEST: <u>Within 750 FC after effective date of AD (not SB)</u></p> <p>AND THEN</p> <p>Extend the action box for replacement/repair.</p> <p>CURRENT: "IMMEDIATELY"</p>			
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	REQUEST:  <u>"WITHIN 4500FC".</u>  If this is acceptable, a/c will not be AOG even if the damage is found at the inspection.			