



**COMMENT RESPONSE DOCUMENT**  
**EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 08-079**  
**CLOSED FOR COMMENTS ON: 18 July 2008**

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Compliance	<p>1. Airbus has confirmed that there are typographical errors in AOT A320-27A1186 dated 23 June 2008, (Airbus Message Ref. SEEL5-2008-257327 Id: 1-10M6L9)namely:</p> <p>BEGIN QUOTE</p> <p>Ref.1: Illustrated Part Catalogue 27-34-51-01 item 290 ROD END, EQUIPPED - Part Number (PN) 341303-XXX</p> <p>PN 341303-XXX is erroneously mentioned in the AOT. PN 341203-XXX is the correct one. Please note that this is in line with IPC and NDT procedure Ref 12 content.</p> <p>Paragraph 4.2.2.A.III. Remove the inboard servo-control rod eye-ends and record the number of turns necessary (Ref 10).</p> <p>It should read outboard (instead of inboard) since this paragraph is dealing with Outboard rod eye-end inspection.</p> <p>END QUOTE</p> <p>2. In addition, Paragraph 4.2.2.A.IV refers to the inboard servo-control rod eye-end; however, this paragraph is dealing with the outboard (instead of the inboard) rod eye-end inspection.</p> <p>3. The method employed in the identification of inspected rod eye-ends is deemed to be rather inappropriate, that is, the use of a "green ty-wrap". The resistance and permanence of this identification mark to in-service conditions is questionable.</p> <p>To conclude, HDA proposes that the PAD to be amended to:</p> <p>A.) Mandate an AOT that is free of typographical errors, and</p> <p>B.) A more permanent re-identification method to be employed for inspected rod eye-ends.</p>	<p>Christopher Tse</p> <p>Technical Services Engineer</p> <p>Hongkong Dragon Airlines Limited (HDA)</p>	07/07/2008	<p>AOT is to be revised by Airbus to address these errors. This will be reflected in the published AD.</p> <p>It is considered that the temporary method of identification employed is sufficient for this initial action. Should further repeat actions be considered as necessary then a more robust method will be put in place.</p>

Compliance	<p>Regarding the EASA PAD 08-079 I would like to propose changing AD Applicability paragraph from Aircraft to Servo-control due to elevator servo-control rod-end ageing is equal to component than A/C ageing.</p> <p>For example:</p> <p>Conformably to AFL A320FAM fleet, AFL oldest A/C has accumulate less than 7 000 FC, and we have servo-control with 25 600 FC accumulated.</p> <p>In accordance with PAD 08-079 Para 2. requirements the inspection have to be preformed with threshold 10 000 FC, but i.a.w AIB SEE 999.0037/08/LB dated 05 MAY 08 one of the root causes is - Multiple cadmium plating performed during repair of the part. The potentially affected rod-end can be installed on A/C with ageing less than threshold and will be inspected i.a.w. A/C ageing.</p> <p>I believe that there can be a case when A/C accumulate 1 000 FC, servo-control (with rod-end) will be changed to another one with ageing 25 000 FC.</p> <p>That is why I propose you to change the PAD 08-079 Applicability to component.</p>	<p>Mikhail Rantsev</p> <p>Leading Engineer</p> <p>Aeroflot - Russian Airlines</p>	10/07/2008	<p>It is agreed that the actual fatigue damage is accrued by each servo-control unit based on the cycles of operation of that unit. However, as the cycles of use of these units are not systematically recorded it is not reliably possible to determine this value. Airbus has therefore determined the inspection period based on the data typically recorded in service.</p>
Applicability	<p>According EASA interpretation of "A320 all certified models" sentence that means at time of AD issuance, it would be preferable to list all EASA certified models as of today (Refer TCDS A.064 issue 3):</p> <p>A318-111, A318-112, A318-121, A318-122, A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-111, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231, A321-232</p> <p>We concur with the rest of the content of this PAD.</p>	<p>Eric Blancaneaux</p> <p>Head of SA Continued Airworthiness</p> <p>AIRBUS</p>	16/07/2008	<p>It is understood that this comment is intended to clearly identify those models to which the AD is applicable such that future models are not automatically included.</p> <p>The applicability will be revised to list the model numbers as defined in the TCDS (currently issue 4).</p>