



COMMENT RESPONSE DOCUMENT
EASA PROPOSED AIRWORTHINESS DIRECTIVE (PAD) No. 09-086
 CLOSED FOR COMMENTS ON: 29 July 2009

PARAGRAPH OR SECTION COMMENTED	COMMENT / PROPOSAL	AUTHOR OF THE COMMENT	DATE OF COMMENT	PCM RESPONSE
Required Action(s) and Compliance Time(s)	ANA requests the extend of compliance from within 36 months to within 48 months after the effective date of this AD because ANA has 23 applicable airplanes and needs more time to complete this modification for all of them.	Noriaki Hattori, All Nippon Airways (ANA)	01/07/2009	The compliance time is determined on a risk analysis basis and this may not always be as convenient as would be liked. However, after further review Airbus has substantiated that the risk assessment would support a compliance time of 4 years. The compliance time is therefore extended to 48 months. This will be reflected in the published AD.
Required Action(s) and Compliance Time(s)	<p>Currently BAW are accomplishing the related Airbus SB A320-24-1120 at Rev 01 as an internal Safety requirement with a NEP of 31/12/2013. This has been determined based upon the longer C-check inputs (10 days >) where the forward galley is removed allowing necessary access to the work area.</p> <p>The proposed compliance date of September 1012 (AD release date plus 36 months) will require the rescheduling of up to 10 BAW aircraft. At the time of the release of the subject SB, there was no indication by EASA of mandating this requirement - relying on Operators to determine [their] own schedules.</p> <p>Please can consideration be applied allowing for minimal disturbance for current Operator schedules?</p>	Rob Vessey, British Airways	01/07/2009	See above answer.
Required Action(s) and Compliance Time(s)	With respect to PAD 09-086 and the indicated compliance period of 36 months it is felt by AER LINGUS that the compliance period of 36 months is insufficient. Due to the significant downtime required to carry-out the modification plus the fact that currently due to	Tom Hayden, Aer Lingus Engineering	01/07/2009	See above answer.

	<p>significant ongoing issues/delays being experienced by AER LINGUS in its current C-CHECK program, it has resulted in a significant 'pushing out' of future C-CHECKS. It is only during [an] aircraft's C-CHECK that such a major modification can be attempted.</p> <p>This may lead to AER LINGUS being exposed in complying with the proposed timeframe. Therefore we would appreciate if consideration can be given to extending this compliance period beyond the indicated 36 months.</p>			
Required Action(s) and Compliance Time(s)	<p>The SB A320 24-1120 takes up to 40 hours elapsed time, Operator like to do this modification in 2C check.</p> <p>For this reason, We think at least 40 months compliance time is requested.</p>	Liu Zixin, Spring Airlines	03/07/2009	See above answer.
Required Action(s) and Compliance Time(s)	<p>Asiana Airlines at South Korea is going to incorporate the SB A320-24-1120 revision 02 into the applicable 17 A320 Family airplanes with MSN 802, 1227, 1356, 1511, 1636, 1734, 2041, 2045, 2110, 2226, 2247, 2290, 2397, 2459, 2808, 2840, 2943 by internally deciding to finish this SB modification by 15 July 2012.</p> <p>AAR already modified 5 airplanes per the SB. AAR can meet the 36 month compliance lead time as shown in the PAD 09-086, if the modification is done at every heavy maintenance period within the 15 July 2012.</p>	Hwang, Jae-Sul Asiana Airlines	06/07/2009	See above answer.
Required Action(s) and Compliance Time(s)	<p>We have noted the planned issuance of AD 09-086.</p> <p>We feel the compliance time of 36 month as too short as the work can be done only in Base Maintenance.</p> <p>For this reason we propose to extend the compliance to 48 months, which provides space to perform the work in an economical manner.</p>	Günter Lange. Air Berlin	06/07/2009	See above answer.
Required Action(s) and Compliance Time(s)	<p>On behalf of SAA Technical, I would like to express our concern regarding the 36 months compliance time (after final AD issue date) given in the attached PAD. The SB describes a modification that takes up to 40 hours elapsed time. We feel the compliance time requested by Airbus (48 months-after final AD issue date) is fair. We request a review of the compliance time as we have already planned for this modification to be done on a D check on our fleet.</p>	Bafana Malasa, South African Airways	07/07/2009	See above answer.
Required Action(s) and Compliance Time(s)	<p>Following the issue of proposed airworthiness directive 09-086, EasyJet would like to make the following comments with regards to the compliance time being proposed for this AD</p>	Ian Davies, EasyJet Airlines Company	13/07/2009	See above answer.

	<p>EasyJet are aware of the nature of this AD as this was instigated by an EasyJet aircraft. As a result of this incident a number of procedures have been put in place by Airbus to allow the crew to regain the instruments by switching to the AC BUS 2 manually as quickly as possible in case of an emergency. However it is understood that maintaining the crews situational awareness in situations of this nature are of up most importance.</p> <p>EasyJet currently runs a schedule of equalised maintenance on our Airbus A319/20 aircraft fleet this means aircraft get a heavy maintenance check input every 6 years. As the work, required to modify the network configuration logic, takes up to 47.5 MH to perform EasyJet would have to arrange a separate maintenance visit for a number of aircraft.</p> <p>With the current operational procedures in place with the crews for regaining the system following a bus failure, if accepted by EASA, EasyJet would like to request EASA to consider the possibility of mandating a compliance time of 48 months for the forth coming AD. This will allow [us] and other Airlines in the same situation to embody the modification during a suitable maintenance downtime.</p> <p>We would be extremely grateful for this proposal to be considered for the full issue of this Airworthiness Directive.</p>	Limited		
Required Action(s) and Compliance Time(s)	<p>Based on the conclusion of the ARS SA24.0029, the impact of airworthiness of the loss of AC bus 1 is not more than major.</p> <p>Due to this classification, and based on the comments sent by operators, the compliance time of the SB A320-24-1120 could be based on industrial capability. Therefore, the initial compliance time proposed by AIRBUS (4 years) is the minimum acceptable. It has been confirmed with operators.</p>	Manuel Najar, Aeroconseil	29/07/2009	See above answer.
Required Action(s) and Compliance Time(s)	<p>First off we apologize for being two days late with our comments but hope EASA will still recognize and consider them prior to issuing a final rule.</p> <p>US Airways, although not mandated by EASA, is concerned that this proposed reduction in compliance time will have a detrimental [effect] on our Planning for this AD. Because of the man-hours involved to do this modification we are planning for it to be done during the 6 year HMTV visit. A reduction to 36 months will cause 82 aircraft to fall out of the HMTV window and force us to bring them in for special visits to comply with this modification.</p> <p>While we acknowledge a safety concern with blanking ECAM screens, pre-mod aircraft can recover those screens by manual</p>	Richard Castle, US Airways	31/07/2009	See above answer.

	<p>means detailed in the Pilots FCOM. This modification simply automates the recovery of the ECAM screens and is thus not a high safety risk. Therefore, in our opinion this modification can be complied with during routine HMV visits and not have a detrimental affect on the safety of the fleet.</p> <p>Based on the above mentioned technical justification, US Airways urges EASA to re-think this compliance time proposal and adopt the Airbus proposal of 48 months.</p>			