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| <b>EASA</b>                                                                       | <b>COMMENT RESPONSE DOCUMENT</b>                                                                                   |
|  | <b>EASA PAD No. 10-046</b><br><b>[Published on 17 May 2010 and officially closed for comments on 14 June 2010]</b> |

**Commenter 1 :Company name – commenter's name – date**
**Comment # 1**

With reference to EASA PAD No: 10-046, I would like to clarify the content of the subject PAD with the Airbus SB A320-25-1365 Rev 01, referred in the PAD. Based on Airbus SB A320-25-1365 Rev 01 page 23 paragraph 4 (refer below for the actual quotation), I would like to know which repairs, mentioned in "Caution" section of the SB, is no longer considered permanent and must be inspected again? Is it only the repair of the lower attachments of aluminium lavatory walls no longer considered permanent or the repair of the aluminium wall with composite material does not considered permanent and must be inspected again?

Also, if the repair of aluminium wall with composite material does not consider to be permanent, does this mean it contradict with the requirement of the PAD detailed in Required Action(s) and Compliance Time(s) Paragraph 4?

In addition, based on the previous AD F-2005-046, Dragonair has performed the repair of aluminium wall with composite material on lavatory A and E as per SB A320-25-1365 Rev 00, CMM 25-41-51 and CMM 25-43-52 to the applicable aircraft. As per the PAD Required Action(s) and Compliance Time(s) Paragraph 4, does this mean Dragonair has comply with the requirement of this new PAD?

Finally, does this PAD have any compliance time frames and due dates?

**Quotations:**

As per the PAD Required Action(s) and Compliance Time(s) Paragraph 4, it stated:

*"No action is required by this AD on the lavatory walls that have been repaired as per the composite repair described in the applicable lavatory Component Maintenance Manual (CMM) 25-41-51, CMM 25-43-51 CMM 25-43-52, or CMM 25-43-53, as applicable to lavatory type and on the lavatory walls that have been replaced with a composite wall as described in the above mentioned lavatory CMM."*

With reference to the Airbus SB A320-25-1365 page 23 Paragraph 4, it stated:

*"If necessary, repair the damage as specified in the Inspection Flow Chart.*

*For the Inspection Flow chart, refer to Figure 1*

*For the Temporary Aluminum Repair of LAVs A, D, E and F, refer to Para. C. REPAIR*

*CAUTION: Repairs previously done with the following CMM tasks are no longer considered permanent and must be inspected as per this inspection service bulletin.*

*For the Repair of the Lower attachments of the Aluminum Lavatory Walls of LAVs A, D, E and F, refer to the applicable CMM, Page Block 601.*

*For the Repair of the Aluminum Wall with Composite Material of LAVs A, D, E and F, refer to the applicable CMM, Page Block 601.*

*For the replacement of the existing wall of LAVs A, D, E and F with a composite wall, refer to the applicable CMM.*

*The applicable CMM's are as follows*

*For LAV A - refer to CMM 25-41-51 or SB A320-25-1289*

*For LAV D - refer to CMM 25-43-51, for A320 to SB A320-25-1421 or for A319/A321 to SB A320-25-1497*

*For LAV E - refer to CMM 25-43-52, for A320 refer to SB A320-25-1421 or for A319/A321 refer to SB A320-25-1497.*

*For LAV F - refer to CMM 25-43-53 or SB A320-25-1357"*

***EASA response:***

The Temporary Aluminium Repair of Lavatories A, D, E and F are not considered permanent and must be re-inspected as per SB 25-1365 Rev 01.

The repair of the aluminium wall with composite Material as per CMM is considered permanent.

If Dragonair has already repaired the aluminium wall with composite material as per CMM, Dragonair has complied with the requirement of AD 2010-XXXX.

The 'compliance time frames and due dates' for the required actions are in paragraphs (1) and (2) of the AD, "in accordance with the instructions and at the intervals not to exceed those defined in Airbus SB A320-25-1365 Revision 01". Please note that modification is an optional terminating action, at the discretion of the operator.

No changes will be made to the Final AD in response to this comment.