

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 10-061 [Published on 22 June 2010 and officially closed for comments on 20 July 2010]

Commenter 1 : Lufthansa Technik AG – Mustafa Akkaya – 05 July 2010

Comment # 1

Applicability:

Our interpretation is, when the installed ACT(s) in the A/C has/have not the P/N configuration listed in the AD Appendix 1, the A/C is not affected and no action has to be initiated regarding this AD. This interpretation apply also to A/C, where the ACT(s) were previously affected and has/have been modified with SB 28-1162 in service, because after modification per SB 28-1162 the P/N of the ACT(s) changed to a not listed one in the AD Appendix 1.

But this interpretation is oppositional to the statement in the section "Required action and compliance time" paragraph 2, where a restriction is defined for already modified/replaced ACT(s). This restriction is not articulated in the applicability section of this AD.

Applicability (This AD does not apply....etc.):

This AD mandates the installation of a new specific ACT manhole cover seal. Why is an A/C affected when mod 38036 has been performed in production by any modification/ replacement of the ACT? Our meaning is that by any modification/replacement of the ACT, the installed ACT(s) on A/C must be equipped with this new specific manhole cover seal. This is ensured with the A/C IPC.

RACT [paragraph (2)]:

Why is an A/C affected when a modification/ replacement of the ACT has been performed after accomplishment of the SB 28-1162. The intend of the EASA AD is to implement the new man hole cover seal. By any modification/replacement of the ACT, the installed ACT(s) on A/C must be equipped with this new specific manhole cover seal. This is ensured with the A/C IPC.

EASA response:

EASA agrees.

The interchangeability code of Airbus modification 38036 is 100 (one-way interchangeable: When the old PN is removed, it may be replaced either with the old or with the new PN, and when the new PN is removed, it must be replaced with the new PN). Embodiment of Airbus modification 38036 in production does not allow to re-install the old PN on aeroplane. Consequently, the sentence in the applicability section of this AD has been changed by "This AD does not apply to aeroplanes fitted with ACT having received Airbus Modification 38036 in production".

In reference the INTERCHANGEABILITY/MIXABILITY table of Airbus SB 28-1162 revision 1, the interchangeability code is 01 (one-way interchangeable). Accomplishment of Airbus SB 28-1162 in service prior to the effective date of this AD does not allow to re-install the old PN on aeroplane. This AD does not apply to aeroplanes fitted with ACT having received Airbus SB 28-1162 in service. Consequently the paragraph (2) of the RACT section has been removed.

Commenter 2: US Airways – Richard Castle – 16 July 2010**Comment # 2**

Subject: Notice of Proposed Rulemaking – A319/A320/A321 Additional Center Tank Manhole Covers

References:

/A/ EASA PAD 10-061

/B/ Airbus SB A320-28-1162 dated February 06, 2008

/C/ Airbus SB A320-28-1162 Revision 1 dated July 16, 2008

/D/ Airbus AMM Task 28-11-27-000-001

The reference /A/ Potential Airworthiness Directive (PAD) would mandate a modification of the Additional Center Tanks (ACT) by replacing the manhole seals via accomplishment of the reference /C/ Airbus Service Bulletin affecting A319, A320 and A321 aircraft.

US Airways submits these comments on the proposed rule:

- US Airways currently operates 51 A321 aircraft. Of these aircraft, 28 are configured such that they would require the modification outlined in the reference /C/ Airbus Service Bulletin.
- US Airways agrees with the need to accomplish the proposed changes to meet airworthiness standards. US Airways disagrees, however, with the work-step accomplishment instructions in the reference /C/ Airbus Service Bulletin for modifying the ACTs. The reference /C/ Airbus Service Bulletin calls for the removal of both ACTs for installation of new manhole covers on the ACTs. US Airways believes that the intent of the reference /C/ Airbus Service Bulletin can be accomplished by merely displacing ACT #2 from its installed position without removing it from the aircraft in accordance with the subtasks in reference /D/ and rolling it rearward just enough to get access to ACT #1. US Airways further believes that ACT #1 can be modified as it is currently installed on the aircraft.
- US Airways requests that the reference /C/ Airbus Service Bulletin or any final airworthiness ruling be modified to allow for accomplishment of Reference /C/ via this expedited, less intrusive and less time-consuming means of gaining access to the ACTs.

Thank you for the opportunity to comment on this proposed rule.

EASA response:

EASA agrees in principle with the change proposal. Airbus Design Office is investigating on the work-step accomplishment instructions proposed changes. If these changes are confirmed by Airbus Design Office to be an alternative means of compliance to Airbus SB 28-1162, an AMOC request or an AD revision might be envisaged.