


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-025 [Published on 25 February 2011 and officially closed for comments on 25 March 2011 – republished on 28 November as PAD 11-025R1 and officially closed for comments on 12 December 2011]

Commenter 1: Cathay Pacific Airways Ltd. – Man-Chun Hui – 28 February 2011

Comment # 1

Background

In relation to the instructions/table on page three of PAD 11-025, if the target/sensor combination meets the conditions with the 2nd row of the table then action and compliance time is as the below statement:

"Before next flight (see exception in Note 1 below), replace the interconnecting strut with a serviceable unit (see Note 2 below) in accordance with the instructions of Airbus SB A320-27-1206"

But when you review Airbus SB A320-27-1206, Step C(1)(a)4b<2><c> states: ***Inspect the flap down drive (Refer to AMM Task 27-54-00-200-001 steps 4.A.5 thru 4.A.7) in order to operate the aircraft for a maximum of 50 additional flight cycles.***

Feedback/Request

There is no Step 4.A.7 in the HDA A320 AMM, it is only available in HDA A321 AMM. Therefore if HDA would have to replace the subject interconnecting strut before next flight (if such target/sensor combinations was to be found).

Would suggest a review of the AMM's for various airlines to confirm if this issue only affects HDA before issuance of this AD.

EASA response:

EASA confirms that :

- ***As stated in Note 1 associated to Appendix 1 of the AD, in case of discrepancies found after having inspected the flap down drive, the interconnecting strut must be replaced with a serviceable unit before next flight.***
- ***AMM was revised in May 2011 adding the step 4.A.7 in all configurations.***

No changes have been made to the Final AD in response to this comment.

Commenter 2: Air France – Patrick Theodet – 08 March 2011**Comment # 2**

Please find below our comments on PAD 11-025, relative to flap interconnecting struts concern.

If the AIB IPC is under review for correction, to reflect appropriate configurations according to relevant SB, the CMMM 57.52.17 does not show reference neither to SB 27-1206 nor SB 57-1164.

Please ensure of full coordination with AIRBUS, before release of final AD, to allow full cover of in-shop reference documentation. For your information, AFR contemplates to systematically replace the struts, whatever the P/N, for shop level examination / modification.

Please note that the strut assembly is even not tracked by AIRBUS AIR at aircraft delivery as well as in AFR IT systems. Identifying how a strut is equipped is therefore a real burden at aircraft maintenance level, to comply with the AD.

EASA response:

IPC revision and CMM revision which reflect the correct configurations were respectively published in May 2011 and June 2011.

The new issue of the IPC released in November 2011 takes into account the two interconnecting strut Part Numbers added in Airbus SB A320-27-1206 revision 01. A new revision of the CMM is expected as well in January 2012

Advanced copies of the documentation are available from AIRBUS on request.

No changes have been made to the Final AD in response to this comment.

Commenter 3: Airbus – Konstantinos Sideris – 23 March 2011**Comment # 3**

Please find below AIRBUS comments for PAD 11-025.

For the better clarity of the wording and in order to give to the operators the opportunity to demonstrate compliance without requiring always the physical check, we propose the following modifications of the “Required action(s) and Compliance Time(s)” section:

- (1.2) If an interconnecting strut is installed with a P/N as listed in Table 1 of this AD, identify the P/N and the s/n of the associated target and proximity sensor and, depending on the target and proximity sensor P/N and s/n combination according Appendix 1 of this AD, carry out the actions within the compliance times defined in Appendix 1 for that interconnecting strut.
- (1.3) no action is required on interconnecting strut that do not match one of the (1.2) condition.
- (2) Aeroplanes on which Airbus modification (mod) 27956 has been embodied in production, and on which neither interconnecting strut replacement nor target and/or proximity sensor replacements have been made since first flight are not affected by the requirements of paragraph (1) of this AD. The use of aeroplane maintenance record is acceptable to show compliance with paragraph (1) of this AD.

In addition, please note that the target S/N with last 4 digits 1600 is not part of the affected batch (see SB 27-1206). Thus, the Target serial number column of the Table in appendix 1 shall be modified as:

Configuration / condition

Target serial number

s/n with last 4 digits lower than 1600, or s/n unreadable

s/n with last 4 digits is 1600 or higher

EASA response:

Comments agreed. PAD 11-025 has been revised as follows:

- **Paragraph (1.2) has been updated to clarify that the actions specified in Appendix 1 of this AD are required only for Interconnecting Struts with a target and proximity sensor P/N and s/n combination part of Appendix 1 of this AD.**
- **Paragraph (1.3) has been added to specify that the identification of the affected Interconnecting Struts is also possible in accordance with aeroplane maintenance records data analysis.**
- **Appendix 1 has been corrected accordingly (“s/n lower than 1600” instead of “s/n with last 4 digits 1600 or lower”). (The target serial number condition in Appendix 1 does not refer anymore to the last 4 digits)**
- **Paragraph (3) has been updated to clarify that modification on aeroplane of an interconnecting strut with a P/N as identified in Table 1 of this AD is not allowed, unless it has been determined to be in compliance with the requirements of this AD.**

Commenter 4: China Southern Airline – Ma Guo Dong 马国栋 – 30/11/2011

Comment # 4

The applicability of PAD is not very particular. I want to know if we inspect the aircraft which listed in the EFFECTIVITY of SB A320-27-1206R01 is satisfactory for the subject PAD.

EASA response:

EASA confirms that only the aeroplanes with the serial numbers listed in Airbus SB A320-27-1206R01 are known to have been delivered by Airbus with an ‘affected’ combination of components installed. However, as these components are also available as spare parts, and some installed components may have been moved from one aeroplane to another, other (i.e. more) aeroplanes could be (or become) affected by this unsafe condition.

In addition, paragraph (4) of the AD contains a prohibition to install an ‘affected’ combination on any aeroplane. Such a prohibition must apply to the entire range of aeroplanes for which these parts are approved for installation.

No changes have been made to the Final AD in response to this comment.