

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 11-079 [Published on 25 July 2011 and officially closed for comments on 25 August 2011]

Commenter 1: British Airways Engineering – Keith Vloebergh – 25/8/2011

Comment # 1

British Airways would like to submit the following comments on PAD 11-079:

Request to extend the proposed compliance period.

British Airways has investigated how the SB can be embodied and has concluded that the modification is not suited to 1C or 2C checks as these do not normally have the aircraft electrical power removed during the input and the SB will require 4 days of electrical power off (the standard downtime for a 1C or 2C check being 5 days). The modification can be achieved within the normal downtime for a 4C check, however these are currently scheduled at 80 month intervals as per the MPD, and this exceeds the 60 months compliance time for the proposed AD.

British Airways believes that the risk of an uncommanded retraction of the nose landing gear has already been mitigated by AD 2007-0065 and the risk of a further uncommanded nose gear retraction event is very low (indeed no such events have been reported as stated in the PAD). Therefore, we believe no significant additional risk would be created by extending the proposed AD compliance period to 80 months (or 96 months if the MPD C check interval is escalated to 24 months).

EASA response:

Comment accepted. A review of the airworthiness analysis supports an extended compliance time of 72 months only for aeroplanes on which the Airbus modification 38947 has been embodied in production, or for aeroplanes on which Airbus SB 32-1348 has been embodied in service.

The Final AD has been amended accordingly.

Commenter 2: US Airways – Richard Castle – 25/8/2011

Comment # 2

Please find US Airways comments related to subject PAD below.

Reference: EASA PAD 11-079

This PAD is proposing compliance with Airbus Service Bulletin A320-32-1346 Rev. 04 for commercial carriers. This SB provides power interrupt protection for the

LGCIU's to avoid a NLG retraction incident on ground.

US Airways has 190 aircraft affected by the SB and, per Airbus numbers takes 46 man-hours (33.5 elapsed) to complete. While we have no specific objections to the proposed AD, we would like to provide the following comments:

The PAD compliance time is listed at 60 months which is not a convenient heavy check interval for US Airways nor do we suspect the majority of commercial A320 carriers. In fact we suspect this compliance time is more suited to corporate jet operators affected by SB A320-32-1349 Rev. 02. Per SB A320-32-1346 Rev. 04, the compliance time is dependant on EASA and will be given in the AD – see excerpt from the SB below.

(2) Accomplishment Timescale

Accomplishment of this Service Bulletin is expected to be rendered mandatory by the issue of an Airworthiness Directive (AD) published by the European Aviation Safety Agency (EASA). The accomplishment timescale, which has not yet been defined, will be given in the AD.

US Airways request that the AD compliance time for accomplishment of SB A320-32-1346 Rev.04 be extended to 80 months to align with our heavy check schedule, or if that is not possible, 72 months to align with our heavy check schedule for wet areas i.e. structure underneath galleys and lavatories.

EASA response:

Comment accepted. A review of the airworthiness analysis supports an extended compliance time of 72 months only for aeroplanes on which the Airbus modification 38947 has been embodied in production, or for aeroplanes on which Airbus SB 32-1348 has been embodied in service.

The Final AD has been amended accordingly.