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| <b>EASA</b>                                                                       | <b>COMMENT RESPONSE DOCUMENT</b>                                                                                                                    |
|  | <p align="center"><b>EASA PAD No. 11-112</b><br/> <b>[Published on 03 November 2011 and officially closed for comments on 01 December 2011]</b></p> |

**Commenter 1: Company not specified – Jeroen Wilms – 03/11/2011**

**Comment # 1**

In many of the EASA AD's I have problems with the "Applicability" and "Required Action(s) and Compliance Time(s):" fields. This AD I consider well written but would prefer a change in the numbering of the required actions:

**CHANGE 1:**

Since (2) is a consequence of (1) and not a separate action that needs to be planned in, I would suggest one of the following options:

option 1: change (1) to (1) 1.1 and 2 to 1.2

option 2: add to the text of (1) "Contact Airbus for approved repair instructions and accomplish those instructions accordingly if any cracks are detected".

**CHANGE 2:**

(4) is not a required action but information. I would suggest to make this "NOTE" instead of (4)

The result will look as follows:

with using option 1:

**Required as indicated, unless accomplished previously:**

(1)

(1.1) Before the accumulation of 34 000 flight cycles (FC) since aeroplane first flight, or within 4 500 FC after the effective date of this AD, whichever occurs later, accomplish an HFEC inspection of the windshield central lower node continuity fittings at left-hand (LH) and right-hand (RH) side, in accordance with the accomplishment instructions of Airbus SB A320-53-1245 revision 1.

(1.2) If, during the HFEC inspection as required by paragraph (1) of this AD, cracks are detected, before next flight, contact Airbus for approved repair instructions and accomplish those instructions accordingly.

(2) Within 10 days after the accomplishment of the HFEC inspection as required by paragraph (1) of this AD, report the results, including no findings, to Airbus.

**NOTE:** Aeroplanes which have passed the HFEC inspection and applied the associated corrective actions before the effective date of this AD, in accordance with the accomplishment instructions of Airbus SB A320-53- 1245 at original issue, are compliant with the requirements of paragraphs (1.1) and (1.2) of this AD.

with using option 2:

Required as indicated, unless accomplished previously:

(1) Before the accumulation of 34 000 flight cycles (FC) since aeroplane first flight, or within 4 500 FC after the effective date of this AD, whichever occurs later, accomplish an HFEC inspection of the windshield central lower node continuity fittings at left-hand (LH) and right-hand (RH) side, in accordance with the accomplishment instructions of Airbus SB A320-53-1245 revision 1. Contact Airbus for approved repair instructions and accomplish those instructions accordingly if any cracks are detected

(2) Within 10 days after the accomplishment of the HFEC inspection as required by paragraph (1) of this AD, report the results, including no findings, to Airbus.

NOTE: Aeroplanes which have passed the HFEC inspection and applied the associated corrective actions before the effective date of this AD, in accordance with the accomplishment instructions of Airbus SB A320-53- 1245 at original issue, are compliant with the requirements of paragraphs (1.1) and (1.2) of this AD.

**EASA response:**

*Comments and suggestions understood, but not accepted, for the following reasons:*

*Please note that §§ (1), (2), and (3) have different compliance times, which is sufficient reason to keep these separate.*

*Option 2 is not acceptable, if only because there is no compliance time (before next flight) for the accomplishment of the repair, when findings have been made.*

*Paragraph vs. Note: EASA AD writing standards (which are largely harmonised with other authorities, e.g. FAA) indicated that Notes can only be used to convey information, but not important details with possible regulatory (i.e. enforcement) consequences, like a conditional exemption from having to comply with a required action, like in this case.*

**Commenter 2: Lufthansa Technik – Vincent Bouchet – 07/11/2011**

**Comment # 2**

This AD will require following action and compliance time:

**(3) Within 10 days** after the accomplishment of the HFEC inspection as required by paragraph (1) of this AD, report the results, **including no findings**, to Airbus.

Lufthansa and Lufthansa Technik are agree that findings must be reported as soon as possible to Airbus, but they don't see the need to report no findings within such a short timescale. Inspection of lower node fittings are mainly performed during overhaul and a D-Check takes approx. 3 weeks. Many reporting sheets are sent at least one week after release to service of an overhauled aircraft. For this reason and the fact that Lufthansa and Lufthansa Technik are not understanding the security relevance of reporting no findings in this timescale, we would highly appreciate to escalate this deadline for **no findings** reports to 4 weeks in order to complaint easily with this AD-Note.

**EASA response:**

**Comment accepted.**

**The Final AD has been amended to allow 30 days for the reporting of findings.**