


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 12-022R1</b> <b>[Published on 05 June 2012 and officially closed for comments on 19 June 2012]</b>

**Commenter 1: SIA Engineering Company Ltd – Jimmy Aw – 12/06/2012**

**Comment # 1**

Paragraph 4 of EASA PAD 12-022R1 states as follows:

“For aeroplanes which have been inspected, before the effective date of this AD, in accordance with the instructions of Airbus SB A320-25A1555 at original issue or Revision 01 or Revision 02, and on which findings have been recorded, within 500 FC after the effective date of this AD, without exceeding the compliance time(s) previously required by paragraphs (1.3) and (2.3), as applicable, of EASA AD 2007-0276R1, accomplish the applicable corrective actions in accordance with the instructions of Airbus SB A320-25A1555 Revision 03, or modify the aeroplane as specified in paragraph (5) of this AD.”

Kindly clarify the status when an operator has accomplished SB A320-25A1555 Revision 03 instead of Revision 01 or 02 before the effective date of the AD which PAD 12-022R1 applies.

**EASA response:**

***Please note that PAD 12-022R1 proposes to require certain actions in accordance with the instructions of Airbus SB A320-25A1555 Revision 03. If those actions have already been accomplished before the effective date (Final AD to be published), that is equal to compliance with the AD. The opening statement of each EASA AD (current standard) is that the specified actions are “Required as indicated, unless accomplished previously”.***

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

**Commenter 2: Delta Air Lines, Inc. – Jim Ead – 19/6/2012**

**Comment # 2**

Delta Engineering has the following comments regarding this EASA PAD 12-022R1 - 80 VU fitting inspection:

1/ The new required inspection compliance times for the boroscope inspection of the 80VU rack lower lateral fittings will place a burden on Delta Air Lines, which has many older aircraft affected by this AD. The initial inspection will decrease from 24000 FC to 20000 FC since first flight. In addition, there is a dramatic reduction in the repetitive inspection interval from 4,500 FC to 500 FC. In effect, this will no longer allow us to perform the inspection exclusively at a scheduled heavy maintenance facility, where we have the ability to perform the Terminating Action.

2/ This exposes us to a high risk level of inspection findings during normal scheduled flight operations and a burden/cost of extended Aircraft Out of Service time with loss of Revenue. This is due to the fact that the two Corrective Action Options for inspection findings consists of either applying a 120 man/hr plus Terminating Action OR applying non-terminating corrective action per SB 25A1555. This SB requires Kit 25A1555A01 thru A05 with pending instructions from Airbus, which may cause further delay. What is the work-scope content of this alternate kit option and will it be conducive for Line Maintenance application? Furthermore, what will be the availability and lead time of these Kits (25A1555A01)?

3/ Also, there is a new concurrent inspection to visually inspect the upper fittings and central shelf fittings of the 80VU. However, the EASA paragraph (3) states this inspection is a "...special detail (bore-scope) inspection of the upper fitting and shelves of the 80VU" whereas, the Airbus SB 25A1555 Rev 03 subtask 251555-832-007-001 states a "...Visual Inspection following NTM 51-90-00...". We believe these two inspections methods are not in agreement with each other and should be corrected.

4/ Finally, will there be a requirement to go back and inspect the upper fitting and shelves per the new PAD requirement in paragraph (3) for aircraft that have previously incorporated the Terminating Actions?

**EASA response:**

**1. Comment understood, but the risk assessment for this issue which has been done considering all reported findings towards the fleet does not support a threshold / interval extension. No changes have been made to the Final AD in response to this comment.**

**2. As per Airbus recommendation, when corrective actions are required after an inspection in accordance with the instructions of Airbus SB A320-25A1555, the terminating action (Airbus SB 25-1557 and SB 53-1215) is preferred to the "Repair" solution by replacement of the three fittings by new fittings of the same design. Production and provisioning of SB 25A1555 kits are now stopped. In case an immediate corrective action is required AND Airbus SB 25A1555 kits 01 to 05 are available, Airbus should be contacted for repair instructions. Airbus will review and confirm if the kits available can be used. No changes have been made to the Final AD in response to this comment.**

**3. Airbus confirms that the inspection method should be a visual inspection. Airbus SB A320-25A1555 will be amended at the next technical revision opportunity to remove the NTM reference. AD has been amended accordingly.**

**4. Aeroplanes on which the termination action (Airbus SB A320-25-1557 and SB A320-53-1215) have been embodied are not affected by the requirement of paragraph (3) of this AD. Please note as well that the inspection of the upper fitting and shelves was already part of the instructions of Airbus SB A320-25A1555 (original issue, rev 01, rev 02).**

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

**Commenter 3: United Airlines – Craig Hanson – 16/6/2012 [received via Airbus, 19/6/21012]**

**Comment # 3**

UAL will be affected by the proposed change since we have generally planned the modification on-condition or during heavy-checks close to the previous 24,000 FC threshold. Recognizing that the most-common damage is worn bushings, burred fittings, or rack contacting the central support, we believe it is important to retain the SB A320-25A1555 Rev 03 allowable limits for 4500 FC continued service with 500 FC inspections. Therefore, we appreciate that the PAD refers specifically to the SB corrective actions.

We do agree with another operator's comment regarding PAD paragraph (3); the PAD specifies use of borescope where the SB specifies only a visual inspection per NTM 51-90-00. Based on our experience, a borescope is not necessary to inspect the upper fittings.

***EASA response:***

***Comment understood. Paragraph (4) of AD has been amended accordingly.***

***Airbus confirms that the inspection method should be a visual inspection. Airbus SB A320-25A1555 will be amended at the next technical revision opportunity to remove the NTM reference.***

***The Final AD has been amended accordingly.***