


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p align="center"><b>EASA PAD No. 12-033R1</b>  <b>[Published on 23 April 2012 as PAD 12-033 and republished on 02 May 2012 as PAD 12-033R1,  officially closed for comments on 21 May 2012]</b></p>

**Commenter 1: US Airways – Richard Castle – 04/05/2012**

**Comment # 1**

US Airways would like to offer the following comments with regards to EASA PAD 12-033R1

**References:**

- /A/ EASA PAD 12-033R1 dated 2nd May, 2012
- /B/ Airbus SB A320-28-1138 Revision 2 dated February 06, 2008
- /C/ Airbus SB A320-28-1209 dated December 11, 2011
- /D/ Airbus AMM 28-43-21, 28-43-22

The reference /A/ Proposed Airworthiness Directive (PAD) would mandate an inspection of the Magnetic Fuel Level Indicators (MFLI's) in accordance with Reference /C/ to identify and replace the MFLI series part number (PN) 3508802 where the top-stop is retained with S-shaped lock-wire with a composite material type MFLI PN FRH05000-XX series.

Reference /A/ also prohibits the installation of any MFLI with PN 3508802-XX where the top-stop is retained with the S-shaped lockwire.

US Airways agrees with the need to accomplish the proposed changes iaw Reference /A/ to meet airworthiness standards however, we have the following comments on the proposed rule.

- Accomplishment instructions in the reference /B/ Airbus Service Bulletin permitted replacement of MFLI where the top stop is retained with a S-shaped lock wire with the following two MFLI's:-

(a) Metal type MFLI of MPN 3508802-35, -36, -37 or -38, where the top-stop is retained with a trapped wire.

OR

(b) Composite material type MFLI of MPN FRH05000X series.

- Accomplishment instructions of Reference /C/ Service Bulletin does not provide an option to replace the MFLI with S – shaped lock wire with a MFLI with a trapped wire type.

US Airways requests that the reference /C/ Airbus Service Bulletin or any final airworthiness ruling be modified to allow for replacement of suspect MFLI (top stop secured with S wire type lock wire) with either a MFLI (top stop secured with trapped wire) or a composite MFLI. The top stop secured with trapped wire MFLI's have been deleted from Reference /C/.

US Airways has accomplished Reference /B/ on its affected A/C and since Reference /B/ permitted installation of MFLI with top stop secured by a trapped wire type as

a replacement, we may have installed this MFLI while accomplishing Reference /B/.

US Airways has 177 a/c affected by Reference /C/ and if Reference /C/ is not revised to incorporate our comments, we will be forced to do retroactive work and replace any MFLI (trapped wire type) with a composite type MFLI.

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

**EASA response:**

**Comment understood. The Final AD has been amended to clarify that the affected metallic MFLI (3508802-xx series with the 'S' shaped retaining wire) can be replaced by a metallic MFLI with the top stop retained by a 'trapped wire', or with a composite MFLI, as applicable. Airbus SB A320-28-1209 will be revised accordingly.**

**Commenter 2: China Eastern Airlines – Haoran Ye – 09/05/2012**

**Comment # 2**

CES understand PAD 12-033R1 is published to replace the affected metallic MFLI(3508802-xx series with the 'S' shaped retaining wire). But according to the requirement of paragraph (3), all aeroplanes post mod 27496 should perform the inspection if wing tank MFLI replacement has been made since first flight. Refer to AIRBUS SB A320-28-1138, only the aircraft from MSN 1029 to MSN 2381 (Post MOD 27496) may have had an MFLI installed by the affected metallic MFLI (3508802-xx series with the 'S' shaped retaining wire) because of two way interchangeable in the IPC.

CES suggest the requirement of paragraph (3) can be revised as below:

(3) Aeroplanes on which Airbus modification (mod) 27496 has been embodied in production, and on which no wing tank MFLI replacement with a P/N listed in Table 1 of this AD has been made since first flight, are not affected by the requirement of paragraph (1) of this AD.

**EASA response:**

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

**Commenter 3: AVIANCA – Diogo B. Youssef – 04/06/2012**

**Comment # 3**

Regarding the PAD 12-033 R1, please see below:

In accordance to paragraph (4), after the effective date of AD (16 Jul 2005) none MFLI listed, could be installed. The problem we have is that one of the "prohibited" PNRs have interchangeability on Aircraft IPC as below.

The AD text should clarify if is prohibited the installation of if the installation is limited to parts which were checked for 'S' shaped lock-wire before installation.

***EASA response:***

***Comment understood. The Final AD has been amended to clarify that all affected MFLI have the 'S' shaped lock-wire design.***