


EASA	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 12-060</b> <b>[Published on 05 June 2012 and officially closed for comments on 03 July 2012]</b>

**Commenter 1: Lufthansa Technik AG – Thorsten Koch – 6/6/2012**

**Comment # 1**

We have a comment on PAD 12-060 para (2.1) and (3): They require that [SB] 55-1042 is to be applied within 72 months after effective date of the AD. But in fact, SB 55-1042 has to be accomplished simultaneously with [SB] 55-1034.

If this is not explicitly required by the AD, it could be misinterpreted and thus happen that an elevator is inspected i.a.w. [SB] 55-1034 within the shorter compliance limit of 48 months, but the new part number and weight identification placard is installed at a later time (before 72 months). Theoretically, within this timeframe it could be possible that maintenance work is performed which changes the weight, thus the elevator could be no longer compliant.

We therefore propose to amend the wording as follows:

(2.1) If the elevator weight, determined as required by paragraph (2) of this AD, does not exceed the weight limit specified in SB A320-55-1034 Figure A-SBCAA, as applicable to the aeroplane model and to the elevator P/N, ~~within 72 months after the effective date of this AD~~ **before elevator next flight after the weight check as required by paragraph (2)**, record the elevator weight and re-identify the elevator in accordance with the instructions of Airbus SB A320-55-1042.

(3) If the elevator weight, determined as required by paragraph (1) of this AD, does not exceed the weight limit specified in Airbus SB A320-55-1034 Figure A-SBCAA, as applicable to the aeroplane model and to the elevator P/N, ~~within 72 months after the effective date of this AD~~ **before elevator next flight after the weight check as required by paragraph (1)**, record the elevator weight and re-identify the elevator, in accordance with the instructions of Airbus SB A320-55-1042.

**EASA response:**

*The Final AD, as proposed by PAD 12-060, would require a one-time weight check and re-identification. The monitoring of any weight change is already covered by the ALS part 2 CDCCL.*

*The re-identification delay from 48 to 72 months is given to authorize operator to continue operations with elevator surfaces having a weight exceeding the limit for the aircraft family providing a calculation has been performed by AIRBUS. Such authorization thru RAS process will be limited to maximum 72 months from AD effective date providing no additional maintenance actions that could modify the weight are done.*

*If the requirement of re-identification is requested at the same time, RAS does not apply anymore and AIRBUS will be able to issue an Airbus Statement of Airworthiness Compliance (ASAC) which depends on a National Airworthiness Authority (NAA) issuance of AMOC derogation.*

*This is a flexibility offered by AIRBUS as a one-off to recover and ensure all elevator surfaces within published weight values.*

*EASA consider that between the 48 and 72 months compliance time, CDCCL applies to ensure airworthy of the aircraft.*

**Commenter 2 (follow-up to comment #1 and answer above): Lufthansa Technik AG – Thorsten Koch – 7/6/2012****Comment # 2**

LHT fully agree with the idea of additional flexibility to allow continued operation for a certain period in case the weight limit is exceeded. We also see your point that the time in between would be covered by CDCCL. We are wondering if this exceptional case would not be covered more conveniently through TD/RAS process instead of TA. Anyhow, if TA or RAS, this case is described in PAD paragraph (2.2). Consequently, an explanatory note in paragraph (2.2) would be recommended.

The AD then should focus on the “standard” case, which is that [SB] 55-1034 (weight) and [SB] 55-1042 (re-identification) are intended to be applied at the same time. This standard case is covered in paragraphs (2.1) and (3). And here it is my understanding that there should not be any delay between weighing and re-identification. My fear is that the requirements are not always fully understood and that, without immediate re-identification after weighing according to [SB] 55-1034 in the standard case, the CDCCL could potentially be improperly applied: Note that in case of further weight change, further re-identification could become required, where the new (third) part number might depend on the previous (second) part number. But the elevator still bears the initial (first) part number. Et cetera.

In fact, [SB] 55-1034 requires for the standard case that [SB] 55-1042 is accomplished before you can finish 55-1034. Only if after paint removal etc. the elevator still exceeds the weight, Airbus is to be contacted to obtain deviating instructions, approved through TA or RAS or ASAC/AMOC process. This is the trigger for the case you describe, but again, this is covered by paragraph (2.2).

Consequently, LHT propose to amend paragraphs 2.1 and 3 as by my previous message, and in addition amend para 2.2 as follows:

(2.2) If the elevator weight, determined as required by paragraph (2) of this AD, still exceeds the weight limit specified in SBA320-55-1034 Figure A-SBCAA, as applicable to the aeroplane model and to the elevator P/N, before further flight, contact Airbus to obtain the necessary approved instructions for corrective action and accomplish those instructions accordingly. **Within the compliance time as specified by those instructions, without exceeding 72 months from effective date of this AD, record the elevator weight and re-identify the elevator in accordance with the instructions of Airbus SB A320-55-1042.**

With that being said, I would also like to draw your attention to paragraph (7), which basically disapproves the installation of an elevator PRE 55-1042 (P/N in Table 2, i.e. not re-identified) “unless in compliance with the requirements of this AD”. Again, the only applicable case I could think of are the conditions you describe (exception covered by TA or RAS). So this paragraph could be amended for better understanding to:

(7) From the effective date of this AD, do not install on any aeroplane an elevator with a P/N (first 12 digits only) listed in Table 2 of this AD, unless in compliance with the requirements **of paragraph (2.2)** of this AD.

**EASA response:**

**Comments not agreed.**

**Paragraph (2.1), (3) See response to comment #1**

**Paragraph (2.2) no changes have been made in response to this comment, compliance time and corrective action will be provided by Airbus on case by case basis.**

**Paragraph (7) no changes have been made in response to this comment, paragraph (2.2) is not the only applicable case; the paragraphs (1) to (5) remain applicable.**

**Note: The commenter is correct that RAS/TD might apply instead of TA.**

**Commenter 3: US Airways – Richard Castle – 2/7/2012****Comment # 3**

Airbus SB A320-55-1034, Original Issue dated. Aug. 19, 2011, Appendix 1, states to "...apply one external paint scheme (Refer to CMMm 55-21-15-300-803-A01 "Repainting of the Elevator")." Some of the primer materials called out in the CMMm (copy provided to EASA) are not widely available and thus lead to procurement issues. US Airways requests that the final AD reflect that primer paints called out in SRM 51-23-11, Page 10, Table 6, Sheet 3, F1 area (copy provided to EASA) are approved as alternate paints to apply to elevators that need to be re-painted. There is currently no provision in paragraph J. References of the SB to allow alternate paints to be used in lieu of those provided in the CMMm.

**EASA response:**

**AIRBUS will review and revise AIRBUS documentation if necessary.**