


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 12-074 [Published on 03 July 2012 and officially closed for comments on 31 July 2012]</p>

Commenter 1: Bangkok Airways – Anurak– 04/07/2012

Comment # 1

Bangkok Airways is in review of EASA PAD 12-074 and having some questions.

The reason of issuance of AD is the manufacture problem of the special washers manufactured between Oct 2006 and Jan 2010.

1. What if we installed the washer that manufactured after Jan 2010 by AMM revision before Sep 2011, is it affected by the PAD?
2. In paragraph (5), the statement is not clear enough. The mentioned washers are not allowed to install unless follow the SB and AMM revision after September 2011. However, the AMM should be already revised by now (current revision is May 2012) but the IPC is still showing the same washer part numbers. So this paragraph should be rewritten and allow operator to install the said washers per AMM after Sep 2011.
3. Last September, we replaced the special washers due to corrosion during hangar maintenance check per MPD 572651-01-1-571 (Inspection of MLG Retraction Actuator Attachment Bracket). This task is 6 year interval and it can detect the installation of the washer. I think we can add the inspection required by this AD and SB 57-1169 into the MPD task so that no AD is concerned.

EASA response:

- 1. Washers manufactured after Jan 2010 and installed before September 2011 are compliant with the AD. Paragraph (4) of the Final AD has been amended to make reference to special washers manufactured between October 2006 and January 2010.**
- 2. Airbus IPC will be revised to be in line with AD requirement.**
- 3. The AD is issued to detect and replace the 401 affected specials washers. MPD may be revised to be in line with AD paragraph (5) requirement.**

Commenter 2: Aer Lingus – Dan Fanning – 11/07/2012

Comment # 2

In relation to PAD 12-074 released earlier this month, EIN have queried Airbus in relation to a later PN to those related to this PAD but is not mentioned. See the attached message sent to Airbus and their associated response. In their response they note that they cannot comment on whether this latest PN will be effective to the AD. Can you please advise on this?

NB. With 2 attachments

EASA response:

Only 2 P/Ns (listed in the AD) are affected. As such, other certified P/Ns are not affected by the AD.

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

Commenter 3: easyJet – Andy Knight – 10/07/2012

Comment # 3

With regard to the subject PAD please see EZY comments below:

Lack of industry support: Due to the issue being caused by an AIB approved supplier, EZY believe it is unacceptable for operators to pay for new spares and man hours to inspect/rectify IAW SB A320-57-1169.

EASA response:

Comment noted. EASA considers this to be a matter to be dealt with between Airbus and the operator.

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

Commenter 4: Jet Blue – Edgar Wanyama – 07/08/2012

Comment # 4

References:

/1/ EASA PAD 12-074

/2/ Airbus SB A320-57-1169

/3/ Special Washers P/N D5725260120000 and D5725664320000

Airbus has identified 401 washers (Reference /3/) which were incorrectly manufactured and delivered as spares between 2006 and 2010. Paragraphs (1) – (5) of the proposed AD address the detection and correction of the MLG retraction jack anchorage fitting bearing installation.

The proposed AD intent is to ensure that the irregularly manufactured washers are detected during or after installation. JBU believes that additional information needs to be provided by Airbus about the discrepant washer to ensure configuration control prior to procurement of Reference /3/ from a third party. The discrepant washers are not distinguishable by P/N hence it is noted that Reference /1/, paragraph (5), provides conditions for the installation of a potentially discrepant washer based on the AMM issued after September 2011 and based on Reference /2/.

With additional information provided to operators, stocked Reference /3/ washers can be physically inspected and purged prior to issuing them to the technician. This would avert time delays associated with sourcing discrepant units that may have been stocked by other operators or by heavy maintenance providers.

ACTION:

1. Please provide instructions to inspect for discrepant Reference /3/ washers that have not been installed. A drawing or picture illustration of a faulty washer vs. a good washer would suffice if provided via an Airbus publication.
2. Please incorporate the additional information, requested above, into Reference /1/ in order to ensure configuration control of spares that may include the 401 discrepant units.

JBU notes the July 31, 2012 consultation deadline and apologizes for the late comments.

EASA response:

Two pictures are included in the two SB's in order to illustrate the two different special washers.

Consequently, no changes have been made to the Final AD in response to this comment.

Commenter 5: SABENATECHNICS – Helmi Touel – 17/09/2012**Comment # 5**

Q1: we have A/C MSN1121 on which special washer had been replaced in DEC2010 IAW AMM of MAY 2010. The special washer is not concerned by the incorrect manufacturing issue. Does the inspection IAW 57-1169 applicable to this A/C?

Q2: task 572651-01-1 (DI of jack fitting) had been done on several A/Cs between 2006/2011. Bearing and special washer had been removed and re-installed IAW with old AMM version (prior to Sept2011). Does the inspection IAW 57-1169 applicable to all those A/Cs?

EASA response:

Reply to Q1: See answer to Comment # 1 above.

Reply to Q2: If no part change has been done, the SB is not applicable on this part. No changes have been made to the Final AD in response to this comment.