


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 12-154 [Published on 28 November 2012 and officially closed for comments on 31 December 2012]

Commenter 1: All Nippon Airways – Hideyuki Kato – 29/11/2012

Comment # 1

All Nippon Airways (ANA - JAPAN -) receives and reviews the EASA PAD 12-14 dated 28 Nov 2012

ANA has already investigated the part number of the installed sliding window, and confirmed our A320 fleet are installed Tully Windows not PPG windows from our maintenance records. Of course, affected PPG sliding window in Table 1 are not installed on them. In this case, is it required to identify the manufacturing dates? ANA believe that it is not required to do that in this case. Please advise for it.

If our opinion is acceptable, please consider to add the note in EASA AD, if possible.

EASA response:

Comment understood. The identification of P/N from maintenance records is acceptable, as already indicated in the AD. Such actions, if accomplished before the AD effective date, are acceptable to comply with that requirement, as confirmed by the opening statement “Required as indicated, unless accomplished previously”. In case no ‘affected’ P/N is installed in an aircraft, no corrective action is required for that aircraft, except to comply with paragraph (5) of the AD.

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

Commenter 2: US Airways – Richard Castle – 19/12/2012

Comment # 2

US Airways has one comment with regards to the subject PAD document:

Airbus SB A320-56-1015 Rev. 0, dated. Sep 14/12, which covers PPG SB 1165312-56-001 original issue dated. Feb 29, 2012 calls for modification of the sliding window gasket by drilling 5 additional holes on the inside face of the rubber seal. Once complete an ‘M’ is added to sliding window assembly data plate serial number to signify a post mod seal condition. The problem with this is that per Airbus AMM Task 56-12-11 PB 401, this seal can be removed and installed as a Line Replaceable Unit (LRU) and as such an inadvertent de-modification condition can occur by installing an un-modified seal on a window assembly that has an ‘M’ marked on the data plate. We acknowledge that paragraph (5) under Required Action(s) and Compliance Time(s) of the PAD document states not to install a Seal having P/N 22-17-7640-1 or 22-17-7640-2 unless it has been modified in accordance with Airbus SB A320-56-1015, however once modified, the seal part number does not change

so airlines ability to track the modification state of the seals is severely compromised. This ability to interchange seals from window to window and lack of tracking is reflected in the front pages of both SB's A320-56-1015 and 1016 by the statement "*These seals have been introduced with PPG sliding windows PN NP165312-11 and PN NP165312-12, but may be also installed on previous window versions on in-service aircraft or windows in spare, in case of replacement of the original seal.*"

To ensure more confidence in our ability to comply with this AD, US Airways recommends a more positive tracking method be adopted to differentiate a modified and unmodified condition e.g. a change in part number of the seal rather than addition of an 'M' to the Next Higher Assembly data plate.

Thank you for the opportunity to comment on this PAD.

EASA response:

Comment understood. Airbus and PPG may be expected to find an improved solution (e.g. new seal P/N) to this practical tracking problem. As long as no better solution exists, the current instructions (and, by default, the required actions) remain in place.

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