


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-025 [Published on 04 February 2013 and officially closed for comments on 04 March 2013]

Commenter 1: Air France – Ludovic MBARA – 06 February 2013

[AFR note that] the Grace period of 3000FC or 6000FH mentioned in Table 1 - initial inspection, does not match with the MPD intervals (7500FH, 5000FC). For aircraft which [have] exceeded the threshold, the grace period given does not match with light maintenance check and will require a special downtime.

Could EASA match this Grace period with MPD intervals?

EASA response:

Comment understood, but not agreed. The results of the risk assessment do not support a longer compliance time.

No changes have been made in response to this comment.

Commenter 2: LAN Airlines – C. A. Correa Aguilera – 07 February 2013

I copy the LAN Airlines Engineering Department comments :

- a) This PAD will have very high impact in our fleet because It is applicable to 73 (of 84) airplanes on A320FAM Fleet.
- b) Actual status, LAN Fleet:
 - a. 12 A/C's the inspection must be applied before 3000 FC (approx. before 12 months)
 - b. 07 A/C's the inspection must be applied before 24,000 FC but they have more than 19,000 FC.
 - c. 54 A/C's the inspection must be applied before 24,000FC
- c) High MH and TAT required to perform the Inspection (26 hrs.)
- d) High MH and TAT required to perform the Modification or Terminal action (144 MH and 44 hrs).
- e) "Grace Period" of SB A320-53-1258 and limit B of PAD is less than interval C Check.
- f) Repetitive inspection required by PAD is less than interval C Check.
- g) If finding, it is necessary to contact Airbus in order to apply corrective action **before next flight**.

h) Cost of terminal action approx. USD 29.000 per airplane.

LAN Airlines suggest to modify the “Grace Period” of SB A320-53-1258 and Limit B of PAD in order to perform either inspection or modification during C Check

EASA response:

Comment understood, but not agreed. Refer to response to comment #1.

No changes have been made in response to this comment.

Commenter 3: US Airways – Richard Castle – 01 March 2013

US Airways has some comments concerning this PAD:

The Inspection SB A320-53-1258 covers the entire A320 Family from A318 to A321; however the terminating action SB A320-53-1251 only applies to A320-211, -212, -214, -216, -231, -232, -233 aircraft. We note that SB A320-53-1251 is a requirement for ESG operations to 60,000 flight cycles or 120,000 flight hours, whichever occurs first, and since only the A320-200 series aircraft are certified to this limit currently that may explain why SB A320-53 1251 has limited effectivity but since the worldwide fleet will now be impacted by the inspection requirement then the terminating action should be made available to the worldwide fleet. Requirement for terminating action availability can be justified by a repeat inspection interval of 7000 flight cycles or 15,000 flight hours, whichever occurs first, which does not fit well into a convenient heavy check e.g. 6 year HMV. Additionally, inspection requires removal of seats, floorboards and fasteners and takes 26 hours elapsed time according to the Airbus SB numbers so it is not conducive to be accomplished in a line maintenance environment. Consequently some operators, including US Airways, may wish to terminate the inspection requirement to avoid the burdensome inspections and interval but are currently not permitted to do so on A318, A319 and A321 Series aircraft; therefore US Airways requests that SB A320-53-1251 be revised to cover the same aircraft variants as the inspection SB.

Also, SB A320-53-1258 Para. 3.C.(2)(a)1a states to contact Airbus before further flight in the event that cracks are found. In our experience contacting the OEM delays the repair and return to service of the aircraft and we request that repair drawings be produced and provided to airlines for the most common findings to reduce the risk of extended downtimes for the operator.

EASA response:

Comment understood, but only partially agreed. Refer to response to comment #1 regarding compliance time.

AIRBUS has committed to investigate the feasibility to provide repair drawing for most common findings. In addition, SB A320-53-1251 will be revised to extend its Effectivity.

No changes have been made in response to this comment.