


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-030 [Published on 06 February 2013 and officially closed for comments on 06 March 2013]

Commenter 1: All Nippon Airways – Hideyuki Kato – 14 February 2013

ANA have already received Airbus SB A320-53-1257 and EASA PAD 13-030 and understand the impact for the structure. Currently, ANA review and confirm the compliance time which the time scale is 2 hours/ 1 flight. On the other hand, ANA flight is almost 1 hour or less / 1 flight. Therefore if the time scale is based on flight hours, ANA would like EASA to re-review and decide to extend these cycles. The compliance and grace period are very impact for our revenue flight.

EASA response:

Comment understood.

Nevertheless, based on justification data provided by Airbus. no changes will be made to the Final AD in response to this comment.

Commenter 2: US Airways – Richard Castle – 01 March 2013

PAD 13-030 directs inspection of Tack Holes at FR50 to FR63 between P33/P39 (LH only) in the cargo floor area in accordance with inspection SB A320-53-1257 on all A319, A320 and A321 series aircraft up to and including MSN 5200 and defines an initial threshold of 38,200 flight cycles or 76,400 flight hours for those aircraft under 36,200 flight cycles or 72,400 flight hours when the AD becomes effective. However per ALS Part 2, Rev. 01, Page 4, Para. 1.3 Limit of Validity, the A319 and A321 airframes are only certified to 48,000 flight cycles or 60,000 flight cycles, whichever occurs first. So unless an operators leading tracker is flight cycles this AD will never become effective until the Limit of Validity is extended and at that time we would expect the inspection or terminating action modification to be part of the Limit of Validity extension package (ESG). Can EASA explain the purpose of the flight hour tracking on the A319 and A321 airframes for this AD?

Currently the terminating action SB A320-53-1261 is only applicable to four operators, AFR, D2F, DLH and SVR and similar to PAD 13-025 comments, we believe that this may be related to SB A320-53-1261 being a requirement for ESG operations to 60,000 flight cycles or 120,000 flight hours, whichever occurs first, on A320-200 series aircraft. However, since the worldwide fleet will now be impacted by the inspection requirement then the terminating action should be made available to the worldwide fleet.

Also, similar to PAD 13-025 comments, SB A320-53-1257 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. Airbus SB A320-53-1261 Revision 01 is planned to extend the applicability to the same applicability as that of SB A320-53-1257.

PAD 13-030 has been revised for additional consultation and the Final AD is expected to be published after Airbus SB A320-53-1261 Revision 01 has been issued.