

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 13-078 [Published on 14 June 2013 and officially closed for comments on 12 July 2013]

Commenter 1: Avianca – Guilherme Tavares de Mello – 14/6/2013

Comment # 1

Regarding the PAD 13-078, I want to list two points that is not clear:

On Paragraph (2): It is not clear which repair is mentioned to be verified is was accomplished or not on the aeroplanes that are not listed on the Table 1. This step is a little subjective and could have another interpretations.

On Paragraph (3): Is mentioned to be accomplish an electrical bonding check, but is not mentioned which Procedures Reference must be followed.

EASA response:

Comments not agreed. Any repair that has been done must be verified to be explicitly applicable to the aeroplane MSN. A repair that is intended for a specific (group of) MSN may not be suitable for another MSN and is therefore not allowed to be applied to another MSN, unless a separate, specific, approval has been obtained. In addition, the AD clearly states that actions must be “accomplished in accordance with the instructions of Airbus SB A320-57-1152”. That SB provides all the necessary information and instructions.

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

Commenter 2: LAN Airlines – Cristian Antonio Correa Aguilera – 26/6/2013

Comment # 2

Regarding PAD 13-078, LAN Airlines have the next comments:

- In the first revision of AD, LAN Airlines fleet was not affected; but in the actual revision it is.
- We (on LAN Airlines) expect to perform this task on "C Check" by the limitation included on SB-A320-57-1152, were is indicate that in case of findings, it must be perform before next flight.

On this scenario, and taking into account you do not need a kit or components (only the Primer Coating to isolate the area), could the AD come directed to perform during the 1st "C check" opportunity?

EASA response:

Comment not agreed. The Compliance time of the previous AD (2011-0034) has already expired, i.e. the action should already have been done on the affected aeroplanes. Consequently, there is no need to change that compliance time. For aeroplanes that must comply with this new AD, the corrective action is required within 24 months after the effective date of this new AD.

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

Commenter 3: EasyJet – Shane Isaacson – 27/6/2013**Comment # 3**

(1) Please can you exclude aircraft that are Post MOD 38209 & Pre MOD 38206 from the AD applicability.

MOD 38209 removed the Outer Wing Refuelling Aperture.

MOD 38206 re-introduced the Outer Wing Refuelling Aperture on operator's request.

(2) Also Para. (3) instructs to perform SB A320-57-1152 if it is determined that a primer coating was applied on the mating surface of the overwing refuelling aperture flange.

However, the effectivity of SB A320-57-1152 Rev. 00 only covers a limited range of MSNs:

EFFECTIVITY

This Service Bulletin is applicable to this (these) operator(s) :

AAF	ACA	AFR	AIJ	AUA	BAW	BEL	BGH	BMA	CCA	CYP	DAL	DLH
FHY	GWY	ISS	IWD	JET	KKK	LBT	SSV	SVR	SWR	TAM	TCX	TRK
UAL	USA	VLK										

Effectivity by MSN

0005 0007 0016 0039 0078 0109 0118 0120 0153 0174 0187 0203 0215 0218
 0226-0228 0236-0237 0269-0270 0278 0285-0288 0294 0301 0337 0377 0462-0465
 0520 0523 0528 0544 0876 0888 0921 0935 0974 1014 1102 1130 1160 1162 1177
 1215 1250 1287 1336 1388 1404 1444 1449 1476 1505 1524 1564 1605 1616 1622
 1640 1645 1658 1677 1691 1729 1905

Before this AD is released, please can you ensure Airbus has revised the SB effectivity to cover all A318/A319/A320/A321 that are Pre MOD 38209 or Post MOD 38206?

EASA response:

(1) Comment partially agreed. The AD applies to wings that are fitted with the outer wing refuel aperture. A paragraph has been added in the Final AD to confirm that aeroplanes with Airbus MOD 38209 (Removal of the Outer Wing Refuelling Aperture) and without MOD 38206 (re-introduction of the Outer Wing

Refuelling Aperture) applied in production are not affected by the requirements of the AD, provided that the Outer Wing Refuelling Aperture is not embodied in-service (e.g by STC action – there is no Airbus in-service approved modification for this). For that reason, these aeroplanes are not excluded from the Applicability – in case an (STC) modification is accomplished, the AD will have to be taken into account.

(2) Comment understood, but not agreed. The MSN “effectivity” of the SB is based on Airbus data, i.e. taking into account the condition of each aeroplane known to Airbus. Please note that the AD Reason section explains that “some operators may inadvertently have applied an Airbus repair, approved for only one aeroplane MSN, to other aeroplanes”. For the record, in case of a ‘mismatch’, the Applicability of an AD always overrides the ‘effectivity’ of an SB. Even though the SB does not list an MSN, the actions described in that SB are considered approved and acceptable to accomplish on that MSN.

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