


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 13-115R1</p> <p>[Published on 12 September 2013 and officially closed for comments on 26 September 2013]</p>

Commenter 1: Lufthansa Technik AG – Christian Dimter – 13.09.2013

Comment # 1

Reviewing the revision 1 of PAD13-115, LHT comes to the conclusion that extending the applicability of the SB to A/C not listed in the SB needs further clarification. Further detail is needed concerning the manufacturing dates of the affected batches of crew oxygen pipes and exclusion of crew oxygen pipe replacements BEFORE this manufacturing date from the need for inspection. E.g., EASA could detail that the affected batches were manufactured from xx/yyyy to zz/yyyy, which would then logically exclude any A/C, on which the crew oxygen pipe replacement took place BEFORE date xx/yyyy from such an inspection. Only A/C, on which a crew oxygen pipe replacement took place AFTER date xx/yyyy can be affected by a bad batch number. Without this further detailing, steps (2) and (3) of the required actions would otherwise lead to airlines having to check the documentation of all A/C back to birth whether a crew oxygen pipe has been changed, even in the time span long before the affected pipe batches were produced. With the detailing, A/C records would only have to be checked back to the date xx/yyyy for pipe replacement.

EASA response:

Comment agreed. The Final AD has been amended accordingly.

Commenter 2: Swiss International Airlines Ltd. – Thomas Weilguny – 13.09.2013

Comment # 2

SWR is affected by PAD No. 13-115R1. R1 extends the range of affected aircraft. The PAD states in required action item (3): A review of the aeroplane maintenance records is acceptable in lieu of the inspection required by paragraph (1.1) of this AD.

For operators who want to review their maintenance documentation it would be beneficial to know the manufacturing dates of the affected batches of crew oxygen pipes P/N D3511032000640, batch 40649383, 40724994, 40820410, 40911832, 19356252, 40008586, 40076689, and 40187414.

Knowing the manufacturing dates of the affected batches limits the time period of maintenance records which have to be reviewed. For example if the affected batches were manufactured in 2010 only the maintenance records from the past three years have to be reviewed. Otherwise: as it is possible that aircrafts are operated by several operators during its life time it would be necessary to contact all former operators asking for maintenance documents to prove that no affected oxygen pipe is installed what is a high burden for the current operator.

Is it possible for EASA to issue the manufacturing data of all affected oxygen pipe batches on the proposed AD?

EASA response:

Comment agreed. See also comment #1.

Commenter 3: SAS – Mats Rudolfsson – 26.09.2013

Comment # 3

SAS consider that there is a room for interpretation regarding the wording in Paragraph (1)(1.2)

“If the batch number of the oxygen pipe is 40649383, 40724994, 40820410, 40911832, 19356252, 40008586, 40076689 or 40187414, replace the oxygen pipe with a serviceable part.”

There is no clear requirement when the oxygen pipe should be replaced. SAS would prefer that the procedure could be performed in two steps;

- Inspection of the batch number.
- Replacement within 7 500 flight hours or 26 months, whichever occurs first after the effective date of the AD, if the batch number is affected.

The suggested procedure will make the prerequisites clear and enable a more efficient handling of the AD without compromising the intention.

EASA response:

Comment understood, but not agreed. The commenter has apparently not noticed that, because of the (sub)paragraph structure, the compliance time of “7 500 flight hours or 26 months, whichever occurs first after the effective date of the AD”, as stated in paragraph (1), applies to both actions of sub-paragraphs (1.1) and (1.2), which do not need to be done concurrently, otherwise the (P)AD would explicitly mention this. The ‘two steps’ that the commenter requests are therefore perfectly acceptable to comply with these two requirements.

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

Commenter 4: Croatia Airlines – Tomislav Petric – 17.10.2013

Comment # 4

MSNs operated by Croatia Airlines are not listed in SB A320-35-1069, so we are not affected by paragraph (1) of required actions. But, we are not able to determine that affected parts were not installed by previous operator or during maintenance check performed by third party. This is mainly because P/N D3511032000640 is expandable part, therefore, the batch number from maintenance records can’t always be conclusively identified.

This AD does not give required action for situation described above. What is correct procedure for inspection and possible replacement of affected parts that operators should follow if MSN is not listed in SB A320-35-1069 and batch numbers can’t be identified from maintenance records?

My other comment is related to the list of batch numbers. There is mismatch between the list of batch numbers in SB and the one in AD.

SB list contains two additional batch numbers: 40292749 and 40405164, see marked red below. Is there any special reason for this?

1 Check the batch number of the crew oxygen pipe PN D3511032000640:

19356252, 40008586, 40076689, 40187414, 40292749, 40405164, 40649383,
40724994, 40820410, 40911832

EASA response:

Comment agreed. The Final AD has been corrected accordingly.