


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p align="center"><b>EASA PAD No. 13-125R2</b></p> <p align="center"><b>[Published on 13 November 2013 and officially closed for comments on 27 November 2013]</b></p>

**Commenter 1: Swiss International Air Lines, Ltd. – Thijs De Schryver – 13.11.2013**

**Comment # 1**

Please be informed upon reviewing subject PAD by SWR, it is noticed the inspection interval of paragraph(6) has been reduced from 425FC to 5FC and 8 days compared to documents previously issued in reference to this topic. Nevertheless, per Ref/B/ SB the interval is reduced from 425FC to 100FC. Hence SWR would like EASA to clarify the discrepancy between Ref/A/ PAD and Ref/B/ SB.

In addition, if it is confirmed the physical inspection interval is reduced to 5FC or 8 days SWR will disagree on this statement. SWR is aware of the impact a MLG door failure is imposing. Although history showed, the OEM is not able to get the issue under control, hence SWR has serious doubts an inspection interval of 5FC or 8 days will bring any added value to the actions already performed. Contrary the aircraft availability and maintenance workload is severely increased by implementing the requirements described in Ref/A/ PAD

Questions:

Please, could EASA confirm an inspection interval decrease from 425FC to 5FC or 8 days?

Please, could EASA, if above is confirmed, provide the reason behind the drastic measure and take SWR comments into consideration?

**EASA response:**

**Comment not agreed.**

*The PAD clearly specifies that the interval is reduced from 425 FC to 8 days **or 5FC, whichever occurs later**. The commenter appears to interpret the requirement incorrectly. AIRBUS published interval is 8 days without exceeding 100 FC. The 5 FC is to cover low aeroplane utilisation. EASA have decided that the 8 days limit is dominant over the 100 FC limitation, also because the probability that 100 FC are accumulated in 8 days is considered so small, as to be negligible.*

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

**Commenter 2: Singapore Airlines – Jimmy Aw – 14.11.2013**

**Comment # 2**

Paragraph (6) of PAD 13-125R2 may lead to unintentional violation/non-compliance. If operator operates 3 flights a day, 425 FC is equivalent to about 141 days (21 Dec 2011). If inspection is done on 21 Dec 2011, the next inspection must be done by 29 Dec 2011. The next (third) inspection must be done by 6 Jan 2012 and so on. Operators will not have done such as EASA AD 2011-0069R1 do not have such requirement. As such, EASA may like to look into the following proposed wording.

Extract from PAD 13-125R2:

(6) Within 800 FC after 02 May 2011 [the effective date of the original issue of EASA AD 2011-0069] and, thereafter, at intervals not to exceed 8 calendar days or 5 FC, whichever occurs later, without exceeding 425 FC since last inspection (previous interval as required by EASA AD 2011-0069R1), inspect the door opening sequence of the LH and RH doors of the MLG in accordance with the instructions of Airbus SB A320-32-1390 Revision 02. In case an aeroplane is not operated for a period longer than 8 days, accomplish the inspection as required by paragraph (6) of this AD before next flight.

Proposed wording:

(6) Within 800 FC after 02 May 2011 [the effective date of the original issue of EASA AD 2011-0069] and, thereafter, at intervals not to exceed 425 FC, inspect the door opening sequence of the LH and RH doors of the MLG in accordance with the instructions of paragraph 4.2.2 of Airbus AOT A320-32A1390.

As of the effective date of this AD, repeat inspection at intervals not to exceed 8 calendar days or 5 FC, whichever occur later, inspect the door opening sequence of the LH and RH doors of the MLG in accordance with the instructions of Airbus SB A320-32-1390 Revision 02. In case an aeroplane is not operated for a period longer than 8 days, accomplish the inspection as required by paragraph (6) of this AD before next flight.

**EASA response:**

**Comments not agreed. The current paragraph is considered adequate to ensure continuity with the previous AD for the reduced inspection interval.**

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

**Commenter 3: Germanwings – Jannis Lambertz – 14.11.2013**

**Comment # 3**

While I was working on the PAD 13-125R1 I discovered that on page 2 of the PAD in the Required Action and Compliance Time text there might be a mistake, namely that the interval is not in accordance with the OIT 999 0074-13 from Airbus. You can find the marked part of the PAD in the text below:

“Note 1: The inspection interval of paragraph (6) has been reduced from 425 flight cycles (FC) to 5 FC or 8 days, as compared to the AD 2011-0069R1 requirement, and reference is made to the instructions of Airbus SB A320-32-1390 Revision 02.”

**EASA response:**

**See EASA answer to comment #1. No changes have been made to the Final AD in response to this comment.**

**Commenter 4: Brussels Airlines – Alexander Clarysse – 15.11.2013**

**Comment # 4**

Brussels Airlines Engineering reviewed the Proposal to Issue an **Airworthiness Directive PAD 13-125R2** (further referred to as “the PAD”).

In the same context, Airbus issued Mandatory **SB A320-32-1390 Revision 02** (further referred to as “the SB”) on October 23 2013, which becomes effective within 800 FC after the issue date of the SB.

**REMARKS**

In our opinion, an important discrepancy exists between the referenced SB and the referenced PAD, which is leading to an unclear situation for the operators. In the SB, the interval of the repetitive inspection of the door opening sequence is reduced from 425FC to 100FC, whilst in the PAD, the interval is stated to be reduced to 5FC or 8 days, whichever occurs later (paragraph (6) in the PAD). However, for the inspection procedure itself, the PAD refers to the SB. While the procedure of the SB is followed in the PAD, the interval is once more amended. The reason for this is unclear, since the main modification in the new revision of the SB is the repetitive inspection interval.

Upon the issue of the SB, one would expect that the respective AD would indeed refer to the SB but would copy the inspection interval of the SB as well. BEL was already preparing a temporary revision of the Maintenance Program in order to reflect the modifications of Revision 02 of the SB and is unsure which actions to take now.

**QUESTIONS**

1. Could you please precise the inspection interval of the door opening sequence, as mentioned in paragraph 6 of the PAD, respectively in paragraph E(2) of the SB?
2. In case that the 5FC/8d interval is indeed the final interval of this repetitive inspection, please clarify on which basis this interval has been decided and clarify the discrepancy with the most recent Airbus revision of the SB. Did EASA perform additional tests or do they dispose on additional experience in order to further reduce this interval?

**EASA response:**

**See EASA answer to comment #1. No changes have been made to the Final AD in response to this comment.**

**Commenter 5: Air France – David Mazars – 22.11.2013****Comment # 5**

Further to PAD 13-125R2 please find AFR comments :

a) In para (1) (Restatement of the requirement of AD 2011-0069R1) incorporation of modification to AFM operational procedure is required :

- (1) Within 14 days after 02 May 2011 [the effective date of the original issue of EASA AD 2011-0069], amend the applicable AFM to incorporate the operational procedure as specified below, and thereafter, operate the aeroplane accordingly.

- If ECAM triggers the "L/G GEAR NOT DOWNLOCKED" warning, apply the following procedure:

*Recycle landing gear.*

- If unsuccessful after 2 min:

*Extend landing gear by gravity.*

*Refer to ABN-32 L/G GRAVITY EXTENSION.*

Paragraph (16) of EASA PAD 13-125R2 states about the terminating action for : PFR monitoring, repetitive checks and inspections. But AFM operational procedure is not mentioned. AFR would like to know and be sure if this procedure have still be in AFM or if we can cancel it after terminating action embodiment.

b) Another point is about new requirement in para 6 to perform the inspection before next flight if A/C is grounded for more than 8 days.

For AFR IT system (and maybe other airlines) this type of launching is hardly achievable as check duration is not considered in launching parameters. Moreover if A/C is not operated there is no technical reason to have a degradation of the actuator. Then for a wide majority of A/C operated for passenger transportation the 5 cyc criteria permit to ensure that inspection will be performed during the check or at least the day of released to operations.

So we do not see the real added value for safety improvement compared to launching management complexity.

- (6) Within 800 FC after 02 May 2011 [the effective date of the original issue of EASA AD 2011-0069] and, thereafter, at intervals not to exceed 8 calendar days or 5 FC, whichever occurs later, without exceeding 425 FC since last inspection (previous interval as required by EASA AD 2011-0069R1), inspect the door opening sequence of the LH and RH doors of the MLG in accordance with the instructions of -Airbus SB A320-32-1390 Revision 02.

In case an aeroplane is not operated for a period longer than 8 days, accomplish the inspection as required by paragraph (6) of this AD before next flight.

c) in line with b) item, for A/C affected by AD2013-0132-E in para 10) and 13), the next flight inspection criteria for A/C grounded more than 8 days is not retained. As LGCIU std doesn't influence on actuator condition, there is no reason not to have same requirement.

d) As a general comment the fact to have included major changes in paragraphs with title "restatement of AD ..." is very confusing. On human factor consideration, there is an heavy risk that these changes are not taken into account. This is also increased by the fact that this AD is very long and with many paragraphs with similar requirements.

**EASA response:**

- a) *AFM procedure remains, irrespective of whatever MLG door actuator is fitted.*
- b) *The purpose of the AD is to require the inspection at 8 days interval and to consider a minimum of 5FC to trigger the inspection. The last sentence is to cover the case of an aeroplane having accumulating more than 5FC since last inspection, but in AOG before reaching the 8 days.*

*No changes have been made to the Final AD in response to these comments.*

- c) *Comments valid. Paragraph (10) of the Final AD has been amended to be in line with paragraph (6) of the AD.*
- d) *Comment valid. A note has been added to the Final AD to highlight the changes.*

**Commenter 6: Air Asia Berhad – Ahmad Shafiq Bin Shafian – 25.11.2013**

**Comment # 6**

Please refer to our comments on the PAD 13-125R2 as follows:

1. In reference to RIL SA32D13008013 R01, the new retrofit duration for actuator PN 114122012 is one year while PN 11412211 is two years. Why does the inspection interval as described in the PAD are the same for A/C with PN 114122012 and PN 114122011, whereas the duration of the retrofit for both PN (as described in the RIL) are different (top priorities for PN 114122012)? If we were to focus on PN 114122012, the new interval as described in the PAD should not be applicable for A/C that doesn't fitted with PN 114122012.
2. Since top priorities are given to PN 114122012, we are required to return all of the seed units after completing the retrofit for PN 114122012 to support other airlines worldwide. This will be a huge burden for us as it will interrupt the retrofit process and we still have to continue with the inspection for remaining A/C with PN 114122011. We would need to allocate a large number of manpower for this shorter inspection interval considering the size of our fleet. Therefore, we would like to request the inspection interval for A/C with PN 114122011 to be retain at 425 FC.

**EASA response:**

1. *The compliance for removal from service of P/N 114122012 actuators is reduced, compared to that for those of a previous standard (P/N), based on early fatigue indications. Previous standards being older and with higher cycling, by conservatism the same inspection intervals apply.*
2. *Comments not agreed, see answer above.*

*No changes have been made to the Final AD in response to these comments.*

**Commenter 7: Nastech – JOHN WILLER V. MORALES – 25.11.2013****Comment # 7**

For the statement in paragraph (6) “In case an aeroplane is not operated for a period longer than 8 days, accomplish the inspection as required by paragraph (6) of this AD before next flight.”, will this apply to the initial or repeat interval? If repeat interval, this should be clarified to avoid confusion with the 800FC initial compliance.

We have one A318 VIP aircraft which has not reached 800FC from 02 May 2011. If not clarified, statement above will then require this aircraft to be inspected if it is not operated for a period longer than 8 days.

**EASA response:****Comment not agreed.**

**Original inspection at 800FC remains. The 8 days is for the repetitive inspections. EASA considers that the AD is self-explanatory.**

**In addition, the commenter should note that the modification requirement (§ 14 or 15, as applicable, depending on P/N actuator installed) applies to his aeroplane, even if, prior to modification, no monitoring or inspections are applied.**

**No changes have been made to the Final AD in response to these comments.**

**Commenter 8: Lufthansa & Lufthansa Technik – Stefan Spiesmacher – 26.11.2013****Comment # 8**

on behalf of Lufthansa and Lufthansa Technik, I'd like to submit four comments on PAD 13-125R2, which I'd kindly ask EASA to consider:

1. According to § 4, the physical inspection of the door opening i.a.w. SB A320-32-1390 Rev 02 is an alternative method of compliance to the CFDS read-out required by § 3. As §§ 6 and 10 are identical in nature (besides the requirement of the dimension 'DIM' to be ">" in AOT A32-N001-13 and "greater than or equal" in SB A320-32-1390 Rev 02), all physical door inspections should be an alternative method of compliance to the CFDS read-out acc. to §§ 2 and 3. As the physical inspections are required for all aircraft pre-mod 153655 (SB A320-32-1407, MLGDA PN 114122014) at the same interval as the CFDS read-out is, the alternative method to the CFDS read-out is always in effect. Therefore, no practical reason for the CFDS read-out requirement (§§ 2 thru 5) remains and it could be deleted from the AD or PAD altogether.
2. According to § 13, the inspection i.a.w. § 10 is an alternative method to the inspection i.a.w. §§ 2, 3 and 6. With reference to my argumentation above, the inspection i.a.w. § 6 is equivalent to the inspection i.a.w. § 10. As the inspection i.a.w. § 6 is mandatory for all aircraft pre-mod 153655 (SB A320-32-1407, MLGDA PN 114122014), the requirement of § 10 is always fulfilled and no reference to the LGCIU and interlink configuration is needed anymore. §§ 9 thru 13 of the PAD could be deleted from the AD or PAD altogether.
3. According to § 16, replacement of both MLGDAs with PN up to 114122011 by one with PN 114122014 i.a.w. § 15 cancels all inspection and check requirements. The same should be true for replacements of MLGDAs with PN 114122012 i.a.w. § 14. This is effectively stated by § 18, rendering § 16 redundant.
4. The interval of 8 calendar days was most probably chosen on the basis of the standard s-check interval. For operators with an authorized s-check interval of 9 calendar days, an escalation of the inspection requirements to 9 calendar days or an flight cycle based interval is desirable.

**EASA response:**

**1. This statement remains as restatement of the previous AD, some operators may continue to manage CFDS messages.**

**2. As stated above.**

**4. Extension to 9 days not supported by AIRBUS Design Office.**

**No changes have been made to the Final AD in response to comments 1, 2 and 4.**

**3. Comment partially agreed. Paragraph (16) of the Final AD has been corrected by including a reference to paragraph (14). Paragraph (18) is to address aeroplanes that were delivered with only P/N 114122014 MLG door actuators installed, but may (to be determined by the operator) have had an actuator replaced since delivery. There is no redundancy.**