


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 13-164</b> <b>[Published on 11 November 2013 and officially closed for comments on 09 December 2013]</b>

**Commenter 1: Air Canada – Stéphane Perron – 13.11.2013**
**Comment # 1**

After reviewing the PAD 13-164 we are concerned with the requirements of paragraph 11 which does not allow installing elevator control having P/N 31075-1xx or P/N 31075-3xx. As per the PAD 13-164, the planned effective date will be 14 days after the AD issue date. During that 14-day period, the airlines will have to send their spare units to a repair facility and have the units modified to be fitted with the new style rod eye ends. These spare elevator controls are already compliant to AD 2010-0046R1 which means that the rod eye ends can safely be operated for 5000FC. Therefore, we believe that this can cause spare elevator control shortages, which would result in aircraft being grounded.

**EASA response:**

*An error was made in the IPC concerning parts interchangeability, which has since been corrected for these elevator servo-controls. Airbus SB A320-27-1176 was issued 26 September 2006 to “recommended” affected operators to restore their aeroplane(s) to the correct configuration. Elevator servo-control P/N 31075-0xx, -1xx and -3xx were certified only for A320-111, a Model that is no longer in operation and removed from the TCDS. Nevertheless, EASA confirms that these parts can remain on aircraft, despite the fact that this is in deviation of the type definition of all listed aeroplane models: no unsafe conditions have been identified. An Airbus modification to retro-actively certify such parts for all A320 family aeroplanes is planned.*

*The Final AD has been amended by removing paragraph (11). In addition, P/N 31075-0xx has been added as ‘affected’, as this was inadvertently omitted in the PAD.*

**Commenter 2: China Eastern Airlines – Ye Haoran – 09.12.2013**
**Comment # 2**

CES understands EASA PAD 13-164 is published to introduce and optional terminating action to the repetitive inspections by replacement of the existing elevator servo-control rod eye-ends with the new elevator servo-control rod eye-end. But CES has some comments following:

1. Ref to AIRBUS RETROFIT INFORMATION LETTER (RIL) SA27D13030610 DATED 13 SEP 2013 [see below], AIRBUS and UTAS have no longer support the Free-of-Charge replacement program of SB A320-27A1186 from 03 Sep 2013 and UTAS has stopped production of PNR 241203-500. CES think it is impossible to do the repetitive inspections without the necessary spare parts for a long time and the terminating action is not an optional modification. CES suggests EASA will

revise the compliance times of the requirement in paragraph (8) to help the operators to receive more supports from AIRBUS and UTAS.

2. Taking in account that some aircrafts pre MOD 154554 haven't reach 5000FC since first flight and the initial inspection was not accomplished, CES suggests EASA will revise the requirements of paragraph (8) as below:

Modification of an aeroplane by replacing all four elevator servo-control rod eye-ends with modified (i.e. re-greasable) parts, and re-identification of those servo-controls to P/N 31075-6xx or P/N 31075-8xx, or by installation on that aeroplane of four modified (in accordance with the instructions of Airbus SB A320-27-1223 or Goodrich SB 31075-27-22) servo-controls having P/N 31075-6xx or P/N 31075-8xx, as applicable, constitutes terminating action for the requirements of paragraphs (1) through (7) of this AD for that aeroplane.

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### RETROFIT INFORMATION LETTER – RIL

SUBJECT: ATA 27 – FLIGHT CONTROLS ELEVATOR SERVO-CONTROL ROD EYE-END INSPECTION

SB REFERENCE: A320-27A1186 REV 08 DATED 25 JUL 2012

AIRCRAFT TYPE: A320FAM

OUR REF.: SA27D13030610 DATED 13 SEP 2013

ISSUE 00

#### 1. RETROFIT CLOSURE

AIRBUS SB A320-27A1186 (cover to UTAS VSB 31075-27-21) requested a repetitive NDT inspection of Elevator servo-control rod eye-ends. Inspection aimed at clearing aircraft from cracked units and thus preventing any surface control loss.

This inspection was rendered mandatory by the Airworthiness Authorities through EASA AD 2010-0046 & FAA AD 2011-19-04.

Operators reported to AIRBUS any findings on aircraft to receive Free-Of-Charge replacement units PNR 341203-500 (manhours remaining at Operators' expenses).

**On 03 SEP 2013, AIRBUS issued SB A320-27-1223 (cover to UTAS VSB 31075-27-22) introducing the new rod eye-end design PNR 5000C5042, which when fitted on aircraft cancels SB A320-27A1186 repetitive inspection requirement (mandatory requirement will be published by 4Q2013).**

**From 03 SEP 2013, AIRBUS will no longer support the Free-Of-Charge replacement program from SB A320-27A1186.**

**UTAS stopped production of PNR 341203-500. UTAS will now provide Operators with new PNR 5000C5042 as described in AIRBUS Retrofit Information Letter SA27M13016398 issued on 09 SEP 2013.**

**Operators should now schedule embodiment of SB 27-1223 on aircraft before next inspection requirement, unless Operators hold suitable quantity of PNR 341203-500 to support SB A320-27A1186 accomplishment.**

#### **EASA response:**

- 1. EASA suggests the commenter to contact AIRBUS directly. EASA is not involved in commercial negotiations.**
- 2. Comment accepted. The Final AD has been amended accordingly.**