


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>EASA PAD No. 13-189</b> <b>[Published on 20 December 2013 and officially closed for comments on 17 January 2014]</b>

**Commenter 1: Avianca (Brazil) – Mario Coronado – 27/12/2013**

**Comment # 1**

Regarding paragraph (1) both SB A320-25-1156 and SB A320-25-1265 are not applicable to our fleet concerning their effectivities.

I suppose that this SB's will be revised.

According to paragraph (4) our fleet has MOD 30088 embodied on manufacture and it is not clear if we have to accomplish the required actions on paragraph (1).

**EASA response:**

**Comments understood, but not agreed.**

***There are no plans (and there is no need) to revise the referenced Airbus SB's to expand the group of MSN. It should be noted that the MSN lists in those SBs were based on Airbus production line data concerning installation (of the affected OWS) and delivery (of the affected aeroplanes) – not on current aeroplane installation.***

***It should also be clear that paragraph (1) is only included (i.e. retaining requirements of a previous AD) in this new AD as a legal formality, since that action (modification of OWS involving P/N change) should have been done a long time ago. Please note that the compliance time [36 months after 15 September 2001 = 15 September 2004] expired more than 9 years ago. Nevertheless, in the unlikely event that there could be an aeroplane anywhere in the world (e.g. long-time storage, about to be returned to service) that is still non-compliant with that requirement, through this AD, EASA would alert the State of Registry that corrective action must be applied to that aeroplane.***

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