


EASA	COMMENT RESPONSE DOCUMENT
	<p align="center">EASA PAD No. 14-020 [Published on 24 January 2014 and officially closed for comments on 21 February 2014]</p>

Commenter 1: Lufthansa Technik – Thorsten Koch – 27/01/2014

Comment # 1

Part A: For aircraft in Post-SB A320-57-1043 condition, any revision up to Revision 05 (i.e. CONFIG-002 as per 57-1082 Rev. 04), having exceeded the related inspection threshold, a Grace Period of 850 FC / 1700 FH from AD effective date is proposed.

However, in the compliance paragraph of SB A320-57-1082 Rev. 04 a note is added stating "NOTE*: A grace period of 3750 FC or 7500 FH whichever occurs first from Jul 31/12 has been defined and will be readjusted from SB issuance date with the assumption of an average accumulation of 2500 FC / 5000 FH per year."

Our position is: If 3750 FC / 7500 FH have been demonstrated and justified in accordance with CS 25.571 to be a safe period counted from 31.07.2012, and if there are no additional calendar driven impact (like environmental damage) nor potential discrete source damage (accidental), then we must raise the question why this period has not been published, but instead a rather artificial value based on an arbitrarily chosen average yearly utilization?

In other words, airplanes with a real utilization below 2500 FC / 5000 FH per year are penalized without the technical or regulatory need to do so.

We propose to define the Grace Period as follows:

Aeroplane Configuration	Compliance Time (whichever occurs later, A, B or C)	
Pre-SB A320-57-1043 (any revision)	A	Within 20 700 FC or 41 400 FH, whichever occurs first since aeroplane first flight
	B	Within 7 200 FC or 14 400 FH, whichever occurs first since last inspection per Airbus SB A320-57-1082 up to Revision 03
Post-SB A320-57-1043 (any revision up to Revision 05)	A	Within 7 200 FC or 14 400 FH, whichever occurs first since embodiment of Airbus SB A320-57-1043
	B	<i>Within 3 750 FC or 7 500 FH, whichever occurs first after 31 July 2012</i>
	C	<i>Within 850 FC or 1 700 FH, whichever occurs first after the effective date of this AD</i>

Part B: In addition, it should be noted that at present there is no valid published ICA for aircraft in POST 57-1043 condition: Inspection SB A320-57-1082 requires accomplishment of a Special Detailed Inspection acc. NTM 571195. However, the effectivity of the NTM tasks does not include all MSNs affected by Paragraph (2) of this PAD. We assume that airplanes have been removed with a previous revision of the NTM due to the fact that the aircraft are in POST Mod SB 57-1043 rev. 03 or 04 condition, which was meant to be the terminating action for the inspection. It now resulted that accomplishment of MSB 57-1043 at any revision 00 thru 05 is not effective. This was the reason why ISB 57-1082 Rev. 04 re-installs the inspection requirement; but it still refers to the "old" NTM procedure, while the NTM hasn't yet been revised to re-include all MSNs affected by Paragraph (2) of this PAD.

To avoid misunderstandings and in the light of the short compliance times, we propose to add a note referring to this NTM procedure to clarify that the NTM 571195 is an acceptable means of compliance with Paragraph (2), regardless of its effectivity.

Proposed wording: “(2) For all aeroplanes: Within the compliance times as defined in Table 1 of this AD, as applicable, and thereafter at intervals not to exceed 7 200 flight cycles (FC) or 14 400 FH, whichever occurs first, accomplish a HFEC inspection of the CWB lower surface panel in accordance with instructions of Airbus SB A320-57-1082 Revision 04. **Note: The usage of NTM 571195 is approved by this AD as an acceptable means of compliance.**”

EASA response:

Comment # 1 Part A accepted. The Final AD has been amended accordingly.

Comment # 1 Part B not agreed. Operators must contact Airbus to get all relevant inspection documents. No changes have been made to the Final AD in response to this comment.