


EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-023 [Published on 27 January 2014 and officially closed for comments on 24 February 2014]

Commenter 1: All Nippon Airways Co., Ltd. – Hideyuki Kato – 28/01/2014

Comment # 1

Our fleet A320 have already embodied SB A320-54-1019 modification which is assigned mod 38067 in accordance with a cover page of SB A320-54-1019.

In Para (7) of the PAD, "Aeroplanes on which Airbus mod 38067 (installation of new corner fittings) has been embodied **in production**", the sentence is not described SB A320-54-1019 modification. Please review and add as "Aeroplanes on which Airbus mod 38067 (installation of new corner fittings) has been embodied **in production or SB A320-54-1019**", due to avoided mis-understanding for modified airplanes in accordance with SB A320-54-1019.

EASA response:

Comment noted and agreed. Paragraph (7) of the Final AD has been amended to add a reference to "aeroplanes already modified in-service in accordance with the instructions of Airbus SB A320-54-1019 (any revision)". **If that modification was done before the AD effective date, no (further) action is required, except to comply with paragraph (8), which has been amended accordingly.**

Commenter 2: Austrian Airlines AG – Erwin Fleberger – 28/01/2014

Comment # 2

PAD 14-023 para (2) requires inspection of the lower and medium spars in accordance with the instructions of Airbus SB A320-54-1022 Revision 02 if a corner fitting crack was detected.

PAD para (5) provides credit for inspection acc. para (1) if inspection/corrective action acc. SB 54-1022 was previously performed.

PAD para (6) provides credit for inspection acc. para (1) if SB 54-1019 was performed.

PAD para (5)(6) do not provide credit for PAD para (2) inspection

Following the PAD wording in para (2),(5),(6) an acft with a cracked fitting found e.g. 2009 and modified acc. SB 54-1019 in 2011 is non-compliant with the PAD as PAD para (2) requires inspection of the spars before next flight which in our example was in the past.

Same situation for an acft with a finding during accomplishment of SB 54-1022 Rev. 01 in the past but corrective action within 5000FC/7500FH acc. SB 54-1019 is still open.

During replacement of a cracked fitting acc. SB 54-1019 cracks in the lower or medium spar should be evident to the maintenance staff. Therefore, we recommend that the corrective action as per SB 54-1019 should be considered as terminating action for PAD para (2) inspection also. At least the PAD should provide a grace period for para (2) inspection for acft in a situation as described above.

EASA response:

Comments partially agreed. Paragraph (5) of the Final AD has been amended to include credit for § (2) inspections, if accomplished before the AD effective date.

Paragraph (6) specifies that in-service modification (as also required by § (4) of the AD) constitutes terminating action for the required inspections. If the §(1) inspections are terminated, there can be no §(2) inspections anymore, as that can only be prompted by a §(1) inspection finding. Paragraph (7) has been amended [see Comment #1 above] to give credit for past modification actions.

Finally, it should be noted that this AD does not require actions before the AD effective date. Consequently, there can be no 'non-compliance' regarding actions accomplished before the AD effective date. Credit for past (voluntary) actions is given only to allow the immediate use of the inspection interval, calculated from the latest inspection, rather than re-starting inspections. Any corrective actions done in the past were also voluntary.

Commenter 3: American Airlines (US Airways) – Richard Castle – 21/02/2014

Comment # 3

1. Airbus Inspection SB A320-54-1022 does not show aircraft configuration A320-231 in the effectivity while Airbus Modification SB A320-54-1019 does, thus leaving out inspection as an option on our 10 older A320 A/C (MSN 0052-0317). US Airways requests that SB A320-54-1022 be revised to show this configuration before release of the final AD.
2. In addition to the modification numbers already listed for improved aerodynamic pylons, US Airways believes that aircraft with modification 38067 installed in production should also be exempt from the applicability paragraph of this AD. If EASA is agreeable, please make this change on the final AD.

EASA response:

Comments not agreed.

1. **The fact that, at this time, Model A320-231 aeroplanes are not listed in SB A320-54-1022 does not mean your aircraft cannot be inspected in accordance with the instructions of that SB, as required by the AD. The issuance of the Final AD overrides any differences between AD Applicability and SB 'effectivity' – this is commonly understood. Nevertheless, AIRBUS confirms that inspection SB A320-54-1022 will be updated to Revision 03 to include Model A320-231 and, consequently, will align with modification SB A320-54-1019 effectivity.**
2. **EASA disagrees. Paragraph (7) already provides credit for post-mod 38067 and post-SB A320-54-1019 aeroplanes [see also Comment # 1 above], but that status may not have been retained since entry into service, or since in-service modification. This is the reason for paragraph (8) of the AD, which prohibits re-installation of pre-mod corner fittings on post-mod and post-SB aeroplanes.**

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