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| EASA | COMMENT RESPONSE DOCUMENT |
|  | <p>EASA PAD No. 14-096 and 14-096R1</p> <p>[Published on 11 and 16 June 2014, respectively, and officially closed for comments on 09 July 2014]</p> |

Commenter 1: Samir Schwann – 13/06/14
Comment # 1

- 1) In Reason section: Par.1 quote "shear webs and angles at rear fuselage section 19, on **Frame (FR) 72** and **FR74** " Unquote. What is this different for?! It seems it is better to make it uniform in defining address just like in Par.4.
- 2) In RACT section: What is the relation between 48 000 flight cycles and 96 000 flight hours?
 E.g.: For A320-200 We've had DSG threshold of 48000FC/60000FH, for ISG 37500FC/80000FH, for ESG1 60000FC/120000FH.

EASA response:
Answers to questions, as below:

- 1) *This is EASA standard practice for introducing an acronym (FR for frame, in this case) in AD text.*
- 2) *Airbus original threshold for structural modification was 48 000 FC / 60 000 FH, but taking benefit of the new fatigue mission for ESG operation, the threshold in FH has been extended to 2 times the FC limit.*

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

Commenter 2: S7 Engineering – Sergei Stepanenko – 23/06/14
Comment # 2

Subject PAD 14-096R1 is applicable to A319, A320 and A321 A/C all MSN, except those on which Airbus MOD 30975 has been embodied in production. This means that the 10 SBI A319-114 (MSN 1071-1167) aircrafts are affected by subject PAD, because the Airbus MOD 30975 has not been embodied in production. But Airbus SB A320-53-1266 R01 is not applicable to all SBI A320 Family fleet. We request that EASA and Airbus review this discrepancy.

EASA response:

Comment not agreed. There is no discrepancy between AD and SB. For all MSN candidates to ESG operation beyond the threshold it is operator responsibility to request Airbus to extend SB applicability accordingly. An Airbus OIT is to be issued Q3 2014 to detail how to proceed.

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

Commenter 3: American Airlines – Richard Castle – 03/07/14

Comment # 3

Subject PAD is applicable to the following aircraft types of which American Airlines (US Airways) operates 157.

Airbus A319-111, A319-112, A319-113, A319-114, A319-115, A319-131, A319-132, A319-133, A320-211, A320-212, A320-214, A320-215, A320-216, A320-231, A320-232, A320-233, A321-111, A321-112, A321-131, A321-211, A321-212, A321-213, A321-231 and A321-232 aeroplanes, all manufacturer serial numbers, except those on which Airbus modification 30975 has been embodied in production.

However, the service document to address this proposed AD, Airbus SB A320-53-1266, is only available through the Airbus RFC / RMO process and since we have not purchased this SB, we are unable to comment on the technical content of it. American Airlines (US Airways) trusts that this service document will be converted to a standard SB prior to release of the final AD so that we and other affected carriers are able to comply with the instructions within the bulletin?

EASA response:

Comment not agreed. See answer to Comment #2 above.

Commenter 4: Lufthansa Technik AG – Raik Bauer – 13/06/14

Comment # 4

Lufthansa Technik herewith addresses some comments regarding EASA PAD 14-096 and 14-097 and their effectivity for A319CJ aircraft.

During the A320 fatigue test campaign several fatigue issues have been detected. Fatigue and damage tolerance evaluation revealed that fatigue cracking of the respective structural elements may contribute to a catastrophic failure of the aircraft when operated beyond the standard A320 FAM Design Service Goal (DSG) of 48000FC / 60000FH. Accordingly, structural modifications for operation up to the new Extended Service Goal (ESG) of 60000FC/120000FH have been defined and mandated.

In principle, A319 CJ aircraft (Group 19-1C) can airframe-wise also be affected by these fatigue issues. However, an A319CJ DSG and ALS Part 2 LOV of 18000 FC / 77400 FH, their certified operational limit, does by far not allow operation up to a FC/FH range where the associated fatigue cracking occurs at all.

It is concluded that a PAD compliance time of 48000 FC / 96000 FH for accomplishment of SB 53-1265 and 53-1266 respectively cannot be reached based on the certification basis of A319CJ aircraft. The same applies to all PADs/ADs covering fatigue related modifications or inspections with a compliance time beyond ALS Part 2 LOV.

For potential A319CJ life extension programs, which are currently not planned, and associated modifications, dedicated ADs and /or modification based ALS requirements will have to be issued. However, since those programs are not in place it is deemed not reasonable and technically unjustified to establish formal compliance with mandatory requirements which can certification-wise not be reached.

Lufthansa Technik concurs that the associated Service Bulletins are technically applicable to A319CJ aircraft and can be performed on operators discretion, however it is rejected to mandate these in anticipation of any possible future operational limit extension, which is not yet planned. The A320 fatigue test campaign also revealed

fatigue issues which may occur beyond ESG, however they have not been addressed by ADs or SBs as operation beyond ESG is currently not subject to certification. It is kindly requested to review the above conclusion, coordinate this topic between EASA and AIRBUS, eventually delete A319CJ aircraft (Post Mod 28162, 28238, 28342) from the PAD/AD applicability and to also apply this approach for future PAD/AD issues.

EASA response:

Comment not agreed. An A319 used as corporate jet is a specific configuration: an individual aircraft may never reached the AD compliance time, but the requirement remains at aeroplane model.

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