


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 14-097 [Published on 12 June 2014 and officially closed for comments on 10 July 2014]</p>

Commenter 1: Samir Schwann – 12/06/14
Comment # 1

Regarding to Applicability section: as per information provided in AIRBUS portal SB A320-53-1265 re00 is only applicable to MSN's:0069 0070 0072 0401 and re01 is applicable to MSN's: 0069 0070 0071 0072 0078 0083 0086 0093 0104 0111 0116 0401 0475 0479 0483 0487 0489 0500 0503 0504 0506 0508 0510 0512 0523 0539 0686 0690 0748 0759 0783 0788 0798 0804 0825 0843 0847 0850 0858 0862 0867 0871 0873 0882 0893 0898 0944 0948 0952 0965 0980 0989 1022 1507 1581 1585 1600 1649 1664 1671.

Is it mean that for MSN's other than those specified above Before exceeding 48 000 flight cycles or 96 000 flight hours, whichever occurs first since aeroplane first flight we have to contact upgrade service department of AIRBUS and lunch the standard AIRBUS RFC/RMO procedure?

Or,

Like some other cases this AD will become N/A due to MSN is not listed in SB on MSN's other than listed in SB.

EASA response:

Comment not agreed. As mentioned in the Applicability section, this AD is applicable to all listed A320 and A319 models not having received mod 152637 or mod 32208 in production. To allow operation of the aeroplane beyond 48 000 FC / 96 000 FH, accomplishment of the Airbus SB is mandatory, even if all MSN are not listed in the current SB. Airbus will revise the SB when other MSN become candidate to ESG operation.

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

Commenter 2: Lufthansa Technik AG – Raik Bauer – 13/06/14
Comment # 2

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

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 161.

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 and A320-233 aeroplanes, all manufacturer serial numbers, except those on which Airbus modification (mod) 152637 or mod 32208 has been embodied in production.

However, the service document to address this proposed AD, Airbus SB A320-53-1265, 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?

We also note that Modification 152637 has been applied in production on some of our later A321 aircraft but this aircraft type is not listed in the applicability paragraph of the PAD, so we are unsure if pre-mod 152637 A321 aircraft should be affected by this AD as well? Additionally, we would expect to see Modification 152637 installed in production on later A319 aircraft delivered to American Airlines (MSN 5678 and up) but that does not appear to be the case when looking at aircraft delivery information. Again, if we had access to SB A320-53-1265 these questions might become clearer to us.

EASA response:

Comment understood, but not agreed. This concerns a commercial matter between the operator(s) and Airbus.

A321 models are not affected because there are no Type III exits installed on these models.

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