


EASA	COMMENT RESPONSE DOCUMENT
	<p>EASA PAD No. 14-138</p> <p>[Published on 05 September 2014 and officially closed for comments on 03 October 2014]</p>

Commenter 1: Lufthansa Technik – Stephan Dunkel – 11/09/2014

Comment # 1

- (a) In Para (1.2), (2) and (4) all FVP not marked with “Armdt B” has to be replaced or not be installed. This will have the consequences that all affected SN have to be inspected. No tracking system of a maintenance organization will track the Amendments. Even the delivery documentation doesn’t track this.
- (b) This will lead to an AD non-compliance in the maintenance record systems – because amendments will to be tracked - and will lead in any case to a physical inspection again.
- (c) We, airlines and maintenance provider, want so see a clear PN or SN change to be compliant in the electronic tracking systems.

I have stated this also to Airbus before without success. We hope that the EASA will review the PAD No.: 14-138 and help the airlines and maintenance provider to be compliant with the upcoming AD by a printout of the tracking system. Not to do a physical inspection at the aircraft again. This will reduce – or prevent – the financial burden for the airlines that the Amendment will cause.

EASA response:

Comments understood, but not agreed. No regulation exists to determine how parts manufacturers must identify and mark their components. Consequently, EASA cannot impose/enforce actions that would create a situation as the commenter requests. However, it may be expected that, at a certain moment, the full set of FVP (limited batch of s/n) is ‘accounted for’ and removed from service. When that can be demonstrated, the AD will be cancelled, which will remove the ‘burden’ (financial or otherwise) for operators. No changes have been made to the Final AD in response to this comment.

Commenter 2: China Eastern Airlines – Zhong Lei – 25/09/2014

Comment # 2

CES have two suggestions about EASA PAD 14-138.

1. In EASA PAD 14-138 paragraph (2) red oval below show us to check the aeroplanes since Airbus date of manufacture. CES understand that EASA is worried about the affected FVPs will affect the safety of the aeroplanes. According to AIRBUS SB A320-28-1221 CES think that the affected FVPs only affect the aeroplane MSNs listed in Table 1 of this PAD. So we suggest the check time shall begin at the earliest aeroplane manufacture time which MSN is listed in Table 1 of this PAD.

2. CES think that the paragraph (2) of this PAD is tell us the affected FVPs are FVP P/N 786073-1-0 having a S/N as listed in Appendix 1 of this PAD and not marked with "Amdt B". Did I understand wrong? But the statement of this paragraph is complicated, we suggest that EASA to be helpful and kindness to revise this paragraph to be easily understood.

(2) For an aeroplane having a MSN not listed in Table 1 of this AD, no action is required by this AD, provided it is determined that no FVP P/N 786073-1-0 having a s/n as listed in Appendix 1 of this AD and not marked with "Amdt B" has been installed on that aeroplane since Airbus date of manufacture.

In case an affected FVP is installed, or no s/n identification can be made, within 12 months after the effective date of this AD, replace the FVP with a serviceable part in accordance with the instructions of Airbus SB A320-28-1221.

EASA response:

Comment not agreed. The commenter misinterprets the intent of paragraph (2). The reference to the Airbus date of manufacture is to indicate that any actions made in-service on an aircraft after that date must be taken into account for aircraft with a MSN not listed in Table 1. Paragraphs (2) and (3) indicate that, if (reliable) maintenance records show that no 'affected' replacement FVP P/N 786-073-1-0 was installed on an aircraft (MSN not listed in table 1) since Airbus date of manufacture (also known as delivery to first customer), no action is required on that aircraft, except to comply with paragraph (4). The requirement of paragraph (4) is the reason why the AD applies to 'all' MSN. See also the EASA answer to Comment #1 above.

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

Commenter 3: Air France – Daniel Repiquet – 03/10/2014

Comment # 3

The PAD 14-138 lists the concerned aircraft and concerned FVP Pn & Sn for inspection/replacement.

According to this PAD, there are 107 FVP concerned by this issue for 8000 installed on the whole A320 family fleet.

Despite AFR aircraft are not listed in the PAD nor the SB A320-28-1221 and the concerned FVP are not listed in the AFR aircraft AIR, it is requires to identify the FVP installed on AFR fleet. For AFR fleet the FVP are not listed in our computer system so we are constrained to physically identify the FVP. This task is very heavy in term of man hour and aircraft down time.

In order to avoid this unnecessary expense, AFR propose to split the identification in two phases

1st phase : mandate the FVP identification only on the PAD listed aircraft. If all of the concerned FVP are not identified then apply :

2nd phase : extend the identification to the aircraft not listed in the PAD.

This solution will be more economical for the majority of the operators.

EASA response:

Comment not agreed. The AD does not require s/n identification of each FVP on all aeroplanes, only for aeroplanes listed by MSN in Table 1, and for aeroplanes on which – since Airbus date of manufacture – a replacement FVP P/N 786-073-1-0 was installed.

If records show that no FVP P/N 786-073-1-0 is installed on AFR fleet, no action is required on those aircraft, except to comply with paragraph (4). See also EASA answer to Comment #2 above concerning the intent of paragraphs (2) and (3).

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