

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 14-147 [Published on 13 October 2014 and officially closed for comments on 10 November 2014]

Commenter 1: Air France – Odon Ludovic Mbara – 14/10/2014
Comment # 1

Please find below AFR comments regarding the PAD 14-147: FUSELAGE – External Fuselage Skin – Inspection.

AFR Fleet Status: 76 aircraft Pre-Mod 37878 exist in AFR Fleet with 72 A/C FC > to the AD Threshold of 12 000FC / 24 000 FH and will be inspected within the Grace Period (5 000 FC / 10 000 FH).

AFR already recorded several damage due to chafing cause by the belly fairing. A321 airplane which MSN are below 3399 (16 A/C in AFR fleet) are not listed in the effectivity of the SBs however the Mod 37878 Proposal G0503 issue on 10 Dec 2007 confirms that A321-100 and 321-200 are also concerned:

Technical Information Sheet	Modification No.	37878															
	Proposal No.	G0503 / G0507/ G0516/G0525/															
Title of modification FUSELAGE - FAIRINGS - INTRODUCE CHANGES IN THE FORWARD BELLY FAIRING.																	
<table border="1"> <thead> <tr> <th></th> <th>A320-100/200 (ST1)</th> <th>A321-100/200 (ST2)</th> <th>A319-100 (ST3)</th> <th>A318-100 (ST4)</th> </tr> </thead> <tbody> <tr> <td>Applicable to</td> <td align="center">YES</td> <td align="center">YES</td> <td align="center">YES</td> <td align="center">YES</td> </tr> <tr> <td>Retrofitable</td> <td align="center">YES</td> <td align="center">YES</td> <td align="center">YES</td> <td align="center">YES</td> </tr> </tbody> </table>				A320-100/200 (ST1)	A321-100/200 (ST2)	A319-100 (ST3)	A318-100 (ST4)	Applicable to	YES	YES	YES	YES	Retrofitable	YES	YES	YES	YES
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Applicable to	YES	YES	YES	YES													
Retrofitable	YES	YES	YES	YES													
General description In order to improve the assembly between panel 191BB and the plate, current bended parts will be changed by new machined ones. This change will improve the structural rigidity of this area, that will lead to a best controlled steps.																	

AFR would like to know why A321 are excluded to the effectivity of this AD or SBs.

Compliance: AFR agree with the compliance Grace Period of 5000FC/10000FH as its matches with C check scales.

EASA response:

Comments not agreed. This AD does not apply to A321 aeroplanes because the basic nut plate is improved to prevent chafing. MOD 37878 is also validated on A321 models as common basic standard production modification.

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

Commenter 2: Jet Blue – Jacquelyn Walsh – 23/10/2014**Comment # 2**

The only comment I have is regarding Paragraph (2) of the Required Action(s) and Compliance Time(s). Paragraph 2 states:

(2) If, during any DET as required by paragraph (1) of this AD, damage is detected, before next flight, contact Airbus for approved repair instructions and accomplish those instructions accordingly.

This is not in agreement with the Steps contained in Airbus Service Bulletin A320-53-1287.

- (1) Subtask 531287-832-001-001 - Do a Detailed Inspection of the External Fuselage Skin Panel at FR34, between STGR 43 LH and RH Sides states that if chaffing marks are found :

Do SUBTASK 531287-833-003 001 Depending on Inspection result, rework the Fuselage Skin Panel, and

Do SUBTASK 531287-832-002 001 Depending on Inspection result, do a Special Detailed Inspection of External Fuselage Skin Panel for crack .

Subtask 531287-833-003-001 simply states to: “Do damage rework of the fuselage skin panel in accordance with SRM 53-21-11.” It does not require Airbus to be contacted (as the PAD would require). Once the AD is issued we will comply with it 100%, however we did want to provide the above comments during the PAD phase.

EASA response:

Comment agreed. Contacting Airbus is required when damages are above the SRM limit as detailed in SB A320-53-1287.

Paragraph (2) of the Final AD has been amended accordingly.

Commenter 3: EasyJet (EZY) – Shane Isaacson – 07/11/2014**Comment # 3**

EZY has reviewed the subject PAD and has made the following observation: PAD 14-147 Para. (2) requires the operator to contact Airbus before next flight in the event of detecting damage during the inspection for approved repair instructions. However, the inspection SB A320-53-1287 provides approved repair instructions for damage that is within the SRM allowable damage limits (ADL) post rework and without crack detection (NTM 51-10-08).

EZY would like to see para. (2) rephrased to make it clear that Airbus only needs to be contact in the event of a crack detection post rework and/or the rework exceeds the SRM ADL.

EASA response:

Comment agreed. See answer to Comment #2.