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U.S. Department of Transportation  
 Docket Operations, M-30, West Building Ground Floor, Room W12-140  
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**Subject:** Docket No. FAA-2022-1650; Project Identifier MCAI-2022-00210-T:  
 Airworthiness Directives; Airbus Canada Limited Partnership (Type  
 Certificate Previously Held by C Series Aircraft Limited Partnership (CSALP);  
 Bombardier, Inc.) Airplanes – Proposed Rule

- Reference:**
- (A) Notice of Proposed Rule Making (NPRM): Docket No. FAA-2022-1650;  
 Project Identifier MCAI-2022-00210-T
  - (B) Transport Canada AD CF-2022-04, dated February 14, 2022.
  - (C) A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022

**DELTA’S COMMENTS**

Comment #1	
Commenter Request	DAL requests applicability to be changed as per the applicability statement detailed in A220 Service Bulletin BD500-538009, Issue 002 in lieu of Transport Canada AD (TC AD) CF-2022-04.
Request justification	The radome is considered a rotatable component to DAL. The effectivity statement of TC AD CF-2022-04 is to the Airframe MSN, the effectivity of the affected unit in A220 Service Bulletin BD500-538009, Issue 002 it to the specific radome MSN. DAL considers that the effectivity should be to the rotatable unit in lieu of the airframe as the radomes are often changed from airframe to another airframe, maintaining the applicability to the airframe MSN could lead to not inspecting or replacing an affected unit. Thus, not mitigating the unsafe condition subject to this AD.
List paragraphs that change; describe (nonobvious) changes	<b>PART 39—AIRWORTHINESS DIRECTIVES</b> <ul style="list-style-type: none"> <li>• (c) Applicability</li> </ul>

Comment #2	
Commenter Request	DAL requests credit for compliance of this AD to be granted if accomplished per A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022, or future revisions to the SB in addition to Issue 01 per para (i), with the exception that the painting of the nose radome can be accomplished prior to installation.
Request justification	A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022 contains the correct ASRP reference for painting of the nose radome as opposed to Issue 001 of subject SB. In addition, the nose radomes are painted in the shop prior to installation prior to

	be replaced on the line. The painting of the nose radome after installation as detailed in A220 Service Bulletin BD500-538009, Issue 002, dated June 2 does not accommodate the regular maintenance procedure of the aircraft in service. The work instructions of the SB comply with the intent of TC AD CF-2022-04 since the discrepant radome is removed and an airworthy replacement is installed.
List paragraphs that change; describe (nonobvious) changes	<b>PART 39—AIRWORTHINESS DIRECTIVES</b> <ul style="list-style-type: none"> <li>• (i) Credit for Previous Actions</li> </ul>

Comment #3	
Commenter Request	DAL requests para (h)(2) or (i) is revised to add that accomplishing A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022, is an acceptable means of compliance to this AD in lieu of Transport Canada AD (TC AD) CF-2022-04 with the exception that the painting of the nose radome can be accomplished prior to installation.
Request justification	DAL has accomplished the removal and replacement of 3 of the 6 affected units that delta operates as per the SB with the deviation that the nose radomes have been painted in the shop prior to installation as they are typically painted in the shop and are replaced on the line. The painting of the nose radome after installation as detailed in A220 Service Bulletin BD500-538009, Issue 002, dated June 2 does not accommodate the regular maintenance procedure of the aircraft in service.
List paragraphs that change; describe (nonobvious) changes	<b>PART 39—AIRWORTHINESS DIRECTIVES</b> <ul style="list-style-type: none"> <li>• (h)(2) Exceptions to Transport Canada AD CF-2022-04</li> <li>• (i) Credit for Previous Actions</li> </ul>

Comment #4	
Commenter Request	DAL requests that the following clarification is added to para (j): "While performing corrective actions per A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022 the words "refer to" are used and the operator has a procedure accepted by the FAA the accepted alternative procedure can be used. When the words "in accordance with" are used then the given procedure must be followed."
Request justification	A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022 lists the maintenance procedures to accomplish the work instructions as "refer to". Since DAL has accomplished 3 of the 6 affected radome units and will complete the remaining 3 within the next month per A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022. The verbiage "refer to" has been followed allowing flexibility in the procedure to remove, install and paint the nose radomes utilizing other FAA approved methods.
List paragraphs that change; describe (nonobvious) changes	<b>PART 39—AIRWORTHINESS DIRECTIVES</b> <ul style="list-style-type: none"> <li>• (j) Additional AD Provisions</li> </ul>

Comment #5	
Commenter Request	DAL requests that any Repair Engineering Order (REO) issued by Airbus Canada that is approved by a DAO is an acceptable means of compliance to the FAA AD to be added in in paragraph (h) and (i).
Request justification	The replacement of the nose radome or the replacement or repair of the painted over diverter strip will address the unsafe condition of this AD. The replacement procedure utilized to replace the radome, or the replacement or repair procedure utilized to repair a diverter strip is not critical to resolve the unsafe condition. The unsafe condition is resolved when the radome with painted over diverter strips is removed from service regardless of the procedure.
List paragraphs that change; describe (nonobvious) changes	<p><b>PART 39—AIRWORTHINESS DIRECTIVES</b></p> <ul style="list-style-type: none"> <li>• (h) Exceptions To Transport Canada AD CF-2022-04</li> <li>• (i) Credit for Previous Actions</li> </ul>

Comment #6	
Commenter Request	DAL requests that a clarification stating that any effective radome per the A220 IPDP BD500-A-J53-81-80-01AAA-941A or BD500-A-J53-81-80-02AAA-941A can be installed as an acceptable unit during accomplishment of this AD.
Request justification	The effectivity of a replacement unit is not detailed in the Transport Canada AD CF-2022-04 nor in A220 Service Bulletin BD500-538009, Issue 002, dated June 2, 2022. However, the SB lists P/N C01204101-009 as a spare. DAL considers that any other effective radome listed in the IPDP provides the same level of safety.
List paragraphs that change; describe (nonobvious) changes	<p><b>PART 39—AIRWORTHINESS DIRECTIVES</b></p> <ul style="list-style-type: none"> <li>• (j) Additional AD Provisions</li> </ul>

If you have any further questions or require additional information, please contact **Gabriel Segura** – **SR Engineer, Fleet Engineering**, at [gabriel.segura@delta.com](mailto:gabriel.segura@delta.com). Please include the AD Process & Compliance Engineering group in all correspondence with email: [ADengineering@delta.com](mailto:ADengineering@delta.com).

Thank you,

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