



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-068

[Published on 11 May 2016 and officially closed for comments on 22 June 2016]

Commenter 1: Lufthansa Technik AG – John Donegan – 23/05/2016

Comment # 1

A. This comment will represent the fifth time a request is being made to issue individual ADs to cover individual SB subjects (as has historically been the philosophy for AD issuance). The first request was from operators who requested removal of the WFD SBs from Section 3 of the ALS Part 2 for A340 and to issue ADs – this was partially successful, in that the SBs were removed with ALS Variation 1.3 in August 2015. However, when this was brought to attention of airworthiness that those SBs were then no longer mandated in October 2015 (by LHT query), those SBs were subsequently all bundled into AD 2016-0035 along with a few other additional ones. The second request came from the operator body Structures Task Group (Toulouse, October 2014). The third request came from LHT comments on PAD 15-154 to EASA, December 2015, available in the CRD document on the EASA website. A fourth request was repeated from the Structures Task Group (Lisbon, April 2016). The fifth request follows below. We would appreciate some initiative for dialogue from either EASA or Airbus Airworthiness with the operator body on this issue.

LHT respectfully requests that each SB subject is dealt with in a separate AD. For justification, refer to comments on 16-067.

B. Regarding Action #5, LHT notes that an alternative technical solution to 53-4218 is under preparation by Airbus (similar to 53-3273 for A330) which will increase the SMP. It should be noted that this is likely to render 53-4218 obsolete, as the new SMP is to be beyond LOV (as presented at the STG in April 2016). Therefore, should an aircraft be approaching the compliance limit of Action #5, a possibility to use the alternative method should be provided and as for comment #2 on 16-067, LHT requests that A340-53-4218 is not mandated at this time and addressed separately, considering the on-going investigations.

C. As commented on 16-067 regarding Note 5, LHT would appreciate a harmonized approach to which compliance values are published by OEM/EASA. Values due after an MPPT but before LOV do not need to be published by OEM in SBs if they are not to be mandated by AD or likely to become ICA. For A340-500/-600 not even an ISG/ESG exercise is planned or likely to be ever done.

EASA response:

A. Comment not agreed. It should be clear that it is EASA policy to (as much as possible) address a single unsafe condition (in this case, WFD) by a single AD action. However, EASA does not dictate Airbus SB publication policy, which is by ATA code, not by general safety subject. Nor can EASA (or Airbus) ensure that all those documents are published or revised simultaneously. As also explained for a previous case of multiple SBs in one



AD, Action numbers are inserted for each required SB/mod in Table 3, to facilitate identifying separate SB/mod actions and recording compliance with each modification required by this AD. In addition, EASA are constantly in contact with operators. We remind you that regular AD Workshops have been organised with the industry and the next AD Workshop is planned for later this year. We warmly invite you to attend in order to continue this constructive dialogue with EASA. This issue could be addressed during the event. No changes have been made to the Final AD in response to this comment.

- B. Comment understood. It is confirmed that an alternative SB is under development, which should be an alternative method for compliance with Action 6 of the Final AD. However, the compliance times should be unchanged and it was decided to issue this final AD, not waiting for issuance of alternative SB. When this AD is published, AMOC can be envisaged and this SB should also be included by reference if this AD is later revised, or if a new AD is issued, as necessary.*
- C. Comments noted, which are more appropriate to be addressed to Airbus and not directly relevant to PAD 16-068. EASA and Airbus continuously review the processes to meet operator needs. No changes have been made to the Final AD in response to this comment.*

