



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-169

**[Published on 06 December 2018 and officially closed for comments on 20 December 2018]**

**Commenter 1: STC Twenty One – Alastair Erskine – 07/12/2018**

### **Comment # 1**

On page 2 of 6, it appears to be incorrectly referring to what I would assume to be an A330 SB - SB A330-53-4237 (later references refer to SB A340-53-4237, and the AD itself is applicable to A340).

NOTE industry has been asking for many years that EASA publishes SBs that are mandated by ADs so that it may be determined whether any design change would affect, or may be affected by, the AD.

My observation of the above apparent error is without visibility of the SB – so please satisfy yourself as to the accuracy of my observation.

### **EASA response:**

***Comment partially agreed. The correct reference of the SB for the Alternative Method was introduced. However, EASA are not in a position to publish applicable SBs as they contain proprietary information owned by Airbus. More information on that point can be found in the related [FAQ](#) published on EASA website.***

***The final AD was amended in response to this comment.***



**Commenter 2: Lufthansa Technik – John Donegan – 13/12/2018****Comment # 2**

Kindly consider extending the effective date to a minimum of 14 days after AD publication, instead of the proposed 7 days. Considering the AD revision does not envisage introduction of any new or more critical requirements than already exists in 2016-0208, no immediate safety concern should exist to justify the need for the shortened 7 days to effective date.

Although the EASA may consider an AD revision to be of minor impact to operators, the release of any AD or AD revision starts an intensive process to ensure compliance, which may take time, even when the operator can anticipate the upcoming requirements from a PAD. If there is no urgent and explicit need for a short effective date, the extension to 14 days (if not 30 days) from AD publication would be greatly appreciated.

**EASA response:**

***Comment agreed. The final AD is effective 14 days after its issuance date.***

