

COMMENT RESPONSE DOCUMENT

EASA PAD No. 19-084R1

[Published on 03 July 2019 and officially closed for comments on 17 July 2019]

Commenter 1: DHL – Christian Köth – 08 July 2019

Comment # 1

BCS deems the functional test as required by PAD §1 as a base check task. BCS utilizes a base check interval of 24 months. Therefore BCS requests to extend the initial threshold from 18 months to 24 months.

Thus to allow the accomplishment of the functional test at the next base check.

EASA response:

EASA disagrees with the comment. Risk assessment has resulted in a target date of 31 March 2021 for the first functional check, and a repetitive interval of 4 000 flight hours for subsequent checks. Because the interval between checks is given in flight hours, the calendar time between checks will be specific for each aeroplane, depending on usage, and can therefore not be linked with the regular 24 months base check. Variations 1.1. to the respective ALS Part 3 Revision 1 (published in February 2019) provided advance information for operators on the target date for the initial check, in order to anticipate future AD requirements.

