

EASA	COMMENT RESPONSE DOCUMENT
	EASA PAD No. 15-034 [Published on 07 April 2015 and officially closed for comments on 05 May 2015]

Commenter 1: Alitalia – Sergio Gioia – 08/04/2015

Comment # 1

Para (1)

“From the effective date of this AD, within the thresholds and intervals as defined in ALS Part 2 Revision 03, accomplish all maintenance tasks, as applicable to aeroplane configuration, as specified in ALS Part 2 at Revision 03.”

Vs AI ALS part 2 rev3

“Except as provided in Table 1, a Compliance Time expiring on AUG 17/16 can be applied, without exceeding A318/A319/A320/A321 ALS Part 2 Revision 02 requirements, if existing, and without exceeding 48000 FC or 60000 FH.”

Consideration:

Compliance time is not within the thresholds and intervals as defined in ALS Part 2 Revision 03 of single tasks but is specified in compliance time of ALS part 2 rev 3.

Para (3)

“Within 12 months after the effective date of this AD, revise the approved aircraft maintenance programme (AMP), on the basis of which the operator or the owner ensures the continuing airworthiness of each operated aeroplane, by incorporating the tasks and associated thresholds and intervals described in ALS Part 2 Revision 03, as applicable to the aeroplane configuration. “

Vs AI ALS part 2 rev 3

“The new/revised instructions and airworthiness limitations given in the Airbus A318/A319/A320/A321 ALS Part 2 Revision 03 shall be introduced in the Operator’s Approved Maintenance Program (AMP) by AUG 17/15 at the latest.”

Consideration:

Pls clarify. Compliance of introduction of ALS part 2 rev 3 is showed in the doc as Aug 17/15. Requirements in the para (3) of PAD must be intend as an extension ?

Para (4)

For an AMP that, on the effective date of this AD, is already updated to incorporate the maintenance tasks as specified in ALS Part 2 at Revision 02, the new and/or more restrictive tasks, as defined in ALS Part 2 at Revision 03, must be incorporated into the AMP to comply with paragraph (3) of this AD.

Consideration: Compliance time of para (4) is not clear. Is different from para (3)?

EASA response:

Para (1): Comment agreed. The words “within the thresholds and intervals as defined in ALS Part 2 Revision 03” **is actually intended to refer to all the compliance times as listed in the ALS, including ‘special’ ones, if any. A Note has been inserted into the Final AD to avoid misinterpretation.**

Para (3): Comment understood. Please note that an ALS Revision cannot be considered ‘required’ by itself. Granted, in Europe, regulation exists (Part M) to make clear that an aircraft maintenance programme must ‘demonstrate compliance’ with ICA (which is understood to include ALS), but that regulation leaves unclear (i.e. open to interpretation) exactly when an operator must demonstrate compliance with that ALS revision, i.e. when that new ALS revision must be incorporated. This, plus the fact that such regulation may not exist in countries outside Europe, is one reason why there are ADs for ALS revisions. The other reason is that EASA has a ‘State of Design’ responsibility to notify (potential) unsafe conditions to other authorities, the AD being the chosen method for this notification. The AD compliance time (for the administrative action to update the AMP) takes precedence over the date in the ALS.

No changes have been made to the Final AD in response to the comment on paragraph (3).

Para (4): Comment understood. Paragraph (4) is not a requirement, but allows (depending on the status of the AMP in question) an alternative action “to comply with paragraph (3) of this AD”, which should make clear that the same compliance time is valid for this alternative.

No changes have been made to the Final AD in response to the comment on paragraph (4).

Commenter 2: Cathay Pacific Airways Limited – Enrico Palazzi – 15/04/2015
Comment # 2

The proposed text for para (3):

“Within 12 months after the effective date of this AD, revise the approved aircraft maintenance programme (AMP), on the basis of which the operator or the owner ensures the continuing airworthiness of each operated aeroplane, by incorporating the tasks and associated thresholds and intervals described in ALS Part 2 Revision 03, as applicable to the aeroplane configuration.”

contradicts with the compliance time stated in ALS Part Rev 03:

“The new/revised instructions and airworthiness limitations given in the Airbus A318/A319/A320/A321 ALS Part 2 Revision 03 shall be introduced in the Operator’s Approved Maintenance Program (AMP) by AUG 17/15 at the latest.”

As the ALS document is also mandatory by itself would please EASA clarify what is the compliance time to revise the AMP and what document takes precedence, either the ALS or the (Proposed) AD when it will be issued.

EASA response:

Comment understood, but not agreed. See EASA answer to Comment # 1, Para (3).

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

Commenter 3: British Airways – Yousouf Bheekhun – 27/04/2015**Comment # 3**

It is understood that ALS Part 2 Rev03 (dated Oct 27/2014) Special Compliance Table 1 may provide a longer compliance period for aircraft that potentially could exceed the revised threshold at the time of ALS Part 2 Rev03 published date, when compared to the PAD paragraph (3) Compliance period of 12 months from proposed AD Effective Date.

BAW would like to suggest that may be the ALS Part 2 Rev03 Special Compliance Table 1 should be noted in this proposed AD so as to match the ALS document compliance period.

EASA response:

Comment agreed. See EASA answer to Comment # 1.

Commenter 4: United Airlines – Craig Hanson – 04/05/2015**Comment # 4**

United Airlines provides the following comment to the PAD 15-034:

PAD 15-034 paragraph (1) requires incorporation of ALS Part 2 Rev 03 tasks within the thresholds and intervals defined in that ALS section. However, the ALS Part 2 Rev 03 contains new and revised tasks with thresholds/intervals that may be below the accumulated time of certain aircraft. Paragraph (1) should be clarified to provide a grace period of 12 months from AD effective date for accomplishment of the new or revised tasks with reduced threshold/interval (whichever is greater).

EASA response:

Comment not agreed. For those cases the commenter refers to, the ALS provides 'special' compliance times (sometimes referred to as 'grace' periods), which are considered part of the compliance times as required (or allowed, as the case may be) by the AD. See also EASA answer to Comment # 1.