


EASA	COMMENT RESPONSE DOCUMENT
	<p style="text-align: center;">EASA PAD No. 15-065 [Published on 22 May 2015 and officially closed for comments on 19 June 2015]</p>

Commenter 1: Lufthansa Technik AGa – Meikel Schaffner – 01/06/2015

Comment # 1

In our opinion the new compliance time specified in “Table 2 – Replacement of 2002-2008 Oxygen Generators” is insufficient. Due to the fact that the oxygen generators are not tracked at DLH fleet, we will get problems to identify the affected oxygen generators within the given minimum time frame of 12 months.

Our system to monitoring the expiry date based on an inspection task acc. Maintenance Schedule with an interval of 24 months. At this inspection we check the expiry date of the chemical oxygen generators. If the age limit will be reached during the next 27 months we change the generators.

In general we have to inspect about 180 A/Cs within 12 months because we have no records about the positions of the affected Oxygen Generators manufactured in 2002, that's in our opinion very difficult to handle in the given time frame.

Due to the mentioned fact we request for an extended minimum compliance time of 24months.

EASA response:

Comment understood, but not agreed.

Identification of all on-board generators and their respective manufacturing dates should not take more than a few hours per aircraft, which can be easily planned during any scheduled down-time. Even for a fleet of 180 aircraft, 12 months should therefore be sufficient.

Apart from the above consideration, it should be noted that the 12 months is also the compliance time for replacement of the 2002 generators. Based on the available information, EASA does not consider that the risk warrant any extension of this compliance time.

Finally, it should be noted that EASA AD 2014-0277 (re-stated in paragraph (1) of the new AD) already required the identification of all oxygen generators to determine the date of manufacture – it would therefore seem likely that records exist (from that action) that show the manufacturing date (not only the 2002 units) of each generator currently installed.

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