


<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<p><b>EASA PAD No. 15-076</b></p> <p><b>[Published on 08 June 2015 and officially closed for comments on 06 July 2015]</b></p>

**Commenter 1: Lufthansa Technik – Karsten Hinkel – 26/06/2015**

**Comment # 1**

1. In the „Ref-Publications“ SB A340-28-4069 original issue is missing.
2. In the „Ref-Publications“ SB A330-28-3082 original issue, Revision 01, Revision 02, Revision 03 and Revision 04 are separately listed but in “Appendix 1” only Revision 01 is listed for the mandatory measure, which is inconsistent.
3. In the „Ref-Publications“ SB A340-28-4097 original issue, Revision 01, Revision 02, Revision 03, Revision 04 and Revision 05 are separately listed but in “Appendix 1” only Revision 03 and Revision 05 are listed for the mandatory measure, which is inconsistent.
4. For SB A330-28-3044 Revision 01, A340-28-4054 Revision 01, A330-28-3053 original issue and A340-28-4069 original issue the compliance limit should be changed into: “..., but no later than 72 months since entry into service.” Which is the requirement listed in the SB and is not be the same as the current setup date “... since Airbus date of manufacture”.
5. In the first line of Note (2) either the word “improvement” or “modification” should be removed from the text since AOT 55-03 is the modification of the lightning strike protection to improve that protection. It is not, as you could read here, an improvement of the modification!
6. In addition, in the Note of ALS Part 5 Section 2 it is said that the modification i.a.w. SB A330-55-3016 can be performed after 31st December 2009 “...whenever the THS removal from aircraft...for any reason...is performed for the first time after such date, or at the first aircraft maintenance task... after such date.”
7. In Note (2) of the PAD it is said only, that it is allowed to perform SB A330-55-3016 after 31st December 2009 when the THS is removed from the aeroplane or when a maintenance task requires the use of THS Lifting and Resting points Fittings. But, it is not mentioned that is to be performed “at the first time respectively at the first maintenance task...after such date”.

**EASA response:**

1. **Comment agreed. The original issue of Airbus SB A340-28-4069 was issued on 25 November 1997. This issuance date has been added in the Final AD accordingly.**

2. *Comment not agreed. Only Airbus SB A330-28-3082 at Revision 01 is mentioned in Appendix 1- - Fuel Safety Inspections / Modifications Table in “Applicable SB” column as this is the minimum SB revision level to address the unsafe condition. All revision levels up to R04 are mentioned in the Ref. Publications as they exist today and they are acceptable to comply with this Final AD requirement. No changes has been made in the Final AD in response to this point.*
3. *Comment not agreed. For Airbus SB A340-28-4097, in (4) of Appendix 1- - Fuel Safety Inspections / Modifications Table, there is a reference to any previous issue preceding Revision 03, which cover SB A340-28-4097 original issue, or Revision 01 or Revision 02. No changes has been made in the Final AD in response to this point.*
4. *Comment agreed. A reference to “no later than 72 months since counted from aircraft first entry in-service” has been added in the final AD in response to this comment. This is copied from old DGAC France AD 98-099-066 or 98-103-082, even if this is no longer used for new EASA ADs.*
5. *Comment agreed. Note 2 has been amended in the Final AD in response to this comment.*
6. and 7. *Comment agreed. Note 2 has been amended in the Final AD in response to this comment.*