



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-091

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**Commenter 1: Cathay Pacific Airways – Miikka Antila – 28/06/2016**

### Comment # 1

1. On the paragraph 3 there is a requirement to carry out SDI on the aircraft with cracked FR47 location after hard landing or abnormal flight event. Cathay would like to highlight that EASA should make sure Airbus AMM will be revised before the AD goes effective. This will avoid any confusion during the maintenance action. Our maintenance organization follows the AMM and always the latest revision. This revision should be stated on the AMM.
2. AMM 05-51-11 step 14 states this is applicable to any post SB 53-6029 but the SB is only inspection SB and there is a possibility that aircraft has been inspected but nil crack finding.
3. Paragraph 6 reporting requirement should not be part of compliance step. This requirement is very difficult to follow and in practice in case of positive finding Airbus must be contacted any way.
4. Could EASA consider to change the rule of AD effectivity date 14 days after AD issue to be 30. This two weeks requirement is too short for airlines to set up all the compliance documents.

### EASA response:

1. *The current AMM 05-51-11 (inspection after hard landing or overweight landing) 05-51-17 (inspection after fight in excessive turbulence or in excess of VMO/MMO) are in line with the PAD §3 requirement. No AMM revision is necessary.*
2. *The caution stated in current AMM 05-51-11 and 05-51-17 clearly indicate that the additional inspection of FR47 is required for any A/C with cracks that have already been reported (during previous inspection as per SB 53-0246; 53-6029; 53-9014). No AMM revision is necessary.*
3. *The reporting of findings (and also nil findings) is an essential part of the activities to assure fleet airworthiness and cooperation from operators is considered as part of that activity.*
4. *The effective date was changed to 30 days after AD publication.*

*Partially agreed. The comments have been considered and changes have been made to the final AD.*

