



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-115

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Commenter 1: Cathay Pacific Airways – Jimmy Cheng – 19/08/2016

Comment # 1

1. For the PAD 16-115 mandated AOT A57W009-16 REV 01 task, an aircraft from AHK have already been inspected per the new requirements of this AOT due to crack finding in this newly identified area on the LHS while performing the AOT A57W009-16 original revision. Since this crack finding at the time was not part of the AOT-A57W009-16 REV 00 inspection area, Airbus was therefore contacted, and resulting AHK to inspect both LH and RH side per the new area, as well as to carry out an Airbus RDAS Ref: 80168073/004/2016 Issue A approved repair (TD_P1_S1_20687_2016#A) on the LHS. Refer to Airbus Dossier 80168073 for details. Consequently, for this aircraft it would not be possible to carry out the inspection as per AOT A57W009-16 REV 01 on the LHS due to the repair doubler. AHK would therefore like EASA to include a statement to mitigate aircrafts from having to carry out inspection per AOT A57W009-16 REV 01 if they have previously embodied an Airbus RDAS approved repair in this area.
2. For the effective date, operators would prefer to have a minimal of 1 months or 30 days after the issuance of the AD to allow operators to provision and setup all the necessary action.
3. Operators do not perceive it is an Airworthiness requirement for reporting the results to Airbus when there are no findings, and therefore PAD 16-115 paragraph (4) should be removed.

EASA response:

1. *The statement “Required as indicated, unless accomplished previously:” is a standard wording and already part of the PAD.*
2. *The date of effectivity must not be considered as a grace period but is a pure administrative allowance.
The required actions must be performed within the compliance times.*
3. *The reporting is an essential means to confirm the effectiveness of the corrective action and the airworthiness of the global fleet.*

No changes to the AD resulted from this comment.

