



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-116

[Published on 02 August 2016 and officially closed for comments on 30 August 2016]

**Commenter 1: Cathay Pacific Airways – Miikka Antila – 04/08/2016**

### Comment # 1

1. Effective Date: “ TBD [standard: 14 days after AD issue date]” should be 30 days after AD issue date. This would give us proper time to set the compliance documents to the system.
2. The AD content itself follows the SB structure so no further comments.

### EASA response:

1. *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.*
2. *No answer needed.*

*No changes to the AD resulted from this comment.*

**Commenter 2: Lufthansa Technik – John Donegan – 17/08/2016**

### Comment # 2

As a comment on PAD 16-116 and several other PAD and ADs we request a change in the standard text used by EASA:

“The use of later approved revisions of these documents is acceptable for compliance with the requirements of the AD”

LHT requests that it is very clear in the text used whether or not increased compliance times (published in an approved SB revision) can be applied by the operator, even before any AD is issued to permit it.

While it may be explained in the “Continuing airworthiness of type design (CAP)” it is not clear in the AD itself that escalated compliance times in an EASA approved SB revision does not necessarily constitute compliance with the requirements of the AD. Several operators are unaware of this



philosophy, as the operators consider published and approved compliance limits of an SB revision on an AD related action to include the sentiments of the AD standard text mentioned above and are automatically considered by them as acceptable for compliance.

A similar process used by FAA and Boeing to not “automatically” advance approve later SB revisions, but rather to issue an AMOC letter once each SB revision is actually published would be one preferable option. This also saves the EASA having to revise the AD.

Hopefully EASA can identify some optimization potential of the wording/procedures with this and future EASA ADs.

***EASA response:***

***The compliance times published within an AD are the legally binding dates. The compliance times published in the SB are determined by the design approval holder based upon part 21 but cannot be enforced or applied directly.***

***No changes to the AD resulted from this comment.***

