



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-131

[Published on 13 September 2016 and officially closed for comments on 11 October 2016]

### Commenter 1: Cathay Pacific Airways Limited – Miikka Antila – 19/09/2016

#### Comment # 1

CPA have the below queries regarding PAD 16-131:

- A. CPA would prefer, if EASA could issue a second AD only for A340-500/600. I am asking this because, if a new AD will be issued to supersede the old one (2016-0082) and it will still mandate A330, then CPA must revise all compliance documents been issued already for nothing. This is how an airline must accomplish AD assessment and revise all AEO documents. If the new AD would be only applicable for A340-500/600, then we (as we do not operate A340-500/600) do not need to do unnecessary admin work.
- B. For the effective date, operator would prefer to have minimum 30 days after the AD issuance to allow reasonable reaction time to set up all necessary compliance documents.
- C. To correct a typo error of the S/N is much appreciated but if my proposal 1 will be approved then please do not revise this old AD.
- D. To amend paragraph 4 to allow a flap swap before the inspection been carried out is very much appreciated. However as my comment 3 only this should need AD revision.

#### EASA response:

- A. Comment not agreed. As correctly highlighted, this new final AD is issued for 2 reasons. Expanding the Applicability to A340-200 and A340-300 aeroplanes and correcting a typographical error for a flap s/n. Because of the second reason, it is not possible to publish a separate AD for A340-200 and A340-300 aeroplanes only. In addition, in principle, it is EASA policy to cover a single unsafe condition by one AD. Finally, in case a superseding AD has already been complied with (as the commenter implies), EASA knows of no regulatory need to alter existing 'compliance' records. The only action expected from an operator in such a case is to record (new entry) that the new AD is 'complied with', preferably with a cross-reference to the previous AD when that action was taken. This is not considered a 'burden' and we trust that the State of Registry authority of the operator concurs with EASA position.**
- B. Comment not agreed. The extension of the period between issue date and effective date is only granted by EASA on an exceptional basis, i.e. in complicated cases like several Service Bulletins to be accomplished on the same aeroplane.**



**C. Comment understood. See answer to point A above.**

**D. Comment understood. With this final AD, it is confirmed that it is possible to remove a flap from one aeroplane and install it on another, provided the part is inspected within the compliance time(s), applicable for this flap. Under the provisions of EASA AD 2016-0182, this was not possible.**

**No changes have been made to the Final AD in response to these comments.**

**Commenter 2: Lufthansa Technik AG – Gregory Templeman – 10/10/2016**

**Comment # 2**

We acknowledge receipt of PAD 16-131 issued on 13 September 2016 and respectfully submit the following comments to subject PAD:

We understand the requirement to expand the applicability of the inspection requirements to A340-200 and A340-300 airplanes.

- A. LHT would like to request an identification of the affected R/H flap on which the typographical error has been corrected. In the frame of AD 2016-0082 operators have to identify potentially affected flaps on their fleet. If only one serial number has been changed, this will speed up the identification process during evaluation of new AD.
- B. In addition, LHT respectfully requests an increase of the effective date from 14 days after AD issue date to 30 days after AD issue date. This will allow the operator to have adequate time to perform the AD evaluation and to set up of active time control by the effective date.

**EASA response:**

**A. Comment agreed: The s/n of the R/H flap affected by the typographical error has been highlighted. The final AD has been amended accordingly.**

**B. Comment not agreed. See EASA answer to Comment # 1, point B, above. No changes have been made to the Final AD in response to this comment.**

