



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-134R1

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Commenter 1: CHINA SOUTHERN AIRLINE – Ma Guo Dong – 03/07/2017

Comment # 1

PAD 16-134R1 informs that EASA will issue a AD to implement A318/A319/A320/A321 ALS Part 1 Revision 05. China Southern Airlines already updated the AMP to incorporate the life limitations as specified in A318/A319/A320/A321 ALS Part 1 Revision 04. In the paragraph (5) of this PAD, there is some sentences about the "compliance time" as following:

-----QUOTE-----

Consequently, for an aeroplane to which that AMP applies, it is acceptable to accomplish the new and more restrictive limitations, as defined in, and within the compliance times as specified in the ALS, to comply with paragraph (1) of this AD.

-----UNQUOTE-----

I have checked the ALS Part 1 Revision 05 for the "compliance time". But ALS says the AD will give an implementation period for introduction of the new or revised instructions and airworthiness limitations. Now neither PAD nor ALS describes the detail about the implementation period. Could you please add the detail content for the "compliance time" in the formal AD?

EASA response:

Comment noted. Actually no “compliance time” (as defined in the ALS, i.e., “Period of time given to Operators to accomplish maintenance tasks and/or replace items (at component or aircraft level) having exceeded or close to exceed the new/reduced airworthiness limitations provided in the Revision/Variation”) is applicable for the new life limitations.

From the effective date of the AD, the new life limitations will be applicable and, before any component exceeds the applicable life limit(s), must be replaced.

References to “compliance time” in the credit paragraphs of this AD have been removed to avoid misunderstanding.



To be noted anyway that, generally speaking, “compliance time”, as used in an AD, does not include only the so-called “grace periods”, but also thresholds and intervals for maintenance tasks.

