



COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-138

[Published on 26 September 2016 and officially closed for comments on 24 October 2016]

Commenter 1: Qantas Airways Limited – Janan Andarmanizadeh – 04/10/2016

Comment # 1

From effective date of the AD, Qantas fleet will be overdue or cannot plan ALI 574100-00010-01A and ALI 574100-00013-01A to the next C check per following table:

ALI 574100-00013-01A	ALI 574100-00010-01A
MSN 014 Overdue	MSN 026 due soon
MSN 015 Overdue	MSN 027 due soon
MSN 026 due before next C check	MSN 062 overdue
MSN 027 due before next C check	MSN 063 due before next C check
MSN 029 due before next C check	MSN 074 due before next C check
MSN 062 due soon	
MSN 063 due before next C check	
MSN 074 due before next C check	

Qantas has already asked Airbus for extension, and Five ASACs (attached files) have been released and the limitations applied to QFA A380 AMP.

ALS part2 variation 5.1 compliance time refers to the new AD's compliance chapter. Will the compliance chapter of this future AD give an implementation period or compliance time of ALI 574100-00010-01A and ALI 574100-00013-01A based on ASACs? If not, then Qantas must obtain the approval from its National Aviation Authority. Would you please review and advice?

EASA response:

The EASA AD requires accomplishment of maintenance actions within the compliance time indicated in Airbus A380 ALS Part 2 and its variation 5.1 from the effective date of the AD. Currently EASA cannot provide a generic grace period which would be applicable to all A380 fleet. For aeroplanes, which on the effective date of the AD accumulated a service life greater than the new thresholds and intervals Airbus provides Airbus Statement of Airworthiness Compliance (ASAC), containing individualised grace periods, which may support an AMOC application to a National Airworthiness Authority.



Commenter 2: Lufthansa Technik AG – Armin Bayer – 14/10/2016**Comment # 2**

This PAD does not grant any grace period for aircraft that are above the reduced thresholds published in REF Variation.
In consequence the tasks with threshold below aircraft utilization will become due immediately after the effective date of the expected EASA AD.
We kindly ask for clarification.

EASA response:

See answer to comment #1.

