



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-163

[Published on 27 November 2016 and officially closed for comments on 27 December 2016]

### Commenter 1: Air France – Xavier Francois – 30/11/2016

#### Comment # 1

Looking to this PAD and the additional works requested by (generated by errors in SB 330-53-3261), it is AFR opinion that it would be more appropriate, for additional works per paragraph 2, to authorize 6 years from the future AD issue instead of 6 years since previous AD 2015-0206 issued one year ago.

In fact, this kind of inspection is generally linked with a heavy maintenance check, since it is the better way to do these inspections without burden. Since heavy maintenance is at 6 years intervals, we suggest to authorize, for paragraph 2, 6 years since future AD effective date. It will permit to operators, which have already embodied this SB, to postpone the inspection at the next heavy maintenance opportunity.

#### EASA response:

**Comment agreed. It has been assessed that, for the additional work, it is possible to extend the compliance time and '6 years after the effective date of this AD, or before exceeding 12 years since the aeroplane date of manufacture, whichever occurs first' is acceptable. The final AD has been amended in response to this comment.**

### Commenter 2: Cathay Pacific Airways Limited – Miikka Antila – 17/12/2016

#### Comment # 2

- A. AD should become effective as a standard 30 days after the issue date.
- B. Paragraph 2 for additional work if already modified using SB REV 00. Grace period or a new compliance time should be stated.

#### EASA response:



**A. Comment not agreed. The extension of the period between issue date and effective date is only granted by EASA on an exceptional basis ie; complicated cases like several Service Bulletin to be accomplished on the same aeroplane. In that case, only one SB or maximum two is to be accomplished.**

**B. See EASA answer to Comment 1.**

**Commenter 3: Lufthansa Technik AG – John Donegan – 23/12/2016**

**Comment # 3**

Please note the following comments:

A. LHT agrees for §1 to keep the original compliance limits given in 2015-0206. However, the additional work compliance times in §2 should count from effective date of the new AD (2017-0XXX). This will allow that a base maintenance event is available (the intent of the original 6YR and 12 YR limits given in the original AD).

B. LHT requests EASA to change standard effectivity from 14 days from effective date to 30 days from effective date, in line with FAA. LHT notes that Airbus design office will have already made allowance in the grace period calculations to cover the “delay” time between SB publication and AD publication; if it is acceptable to extend grace period from SB publication to AD effective date, this allowance will surely also permit pushing out the effective date of an AD a further two weeks to allow operators ample time to perform the AD analysis. For an operator, AD evaluation requires many additional processes to be performed – it is not simply a matter of adding the AD reference to a job card. Please consider the airworthiness necessity of the 14 day limit and consider background of the FAA policy in this regard and consider operator requests to ease burden on operators where no immediate airworthiness issue justifies the need for such a restrictive effective date.

**EASA response:**

**A. See EASA answer to Comment 1.**

**B. See EASA answer to Comment 2 A.**

