



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 16-165

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**Commenter 1: Lufthansa Technik – Stephanie Schott – 14/12/2016**

### **Comment # 1**

According to PAD 16-165 operators need to send out special maintenance staff to perform NMSB on affected aircraft stored at international stations or to apply for an AMOC, because this PAD does not offer a ferry flight back to an operator's home base.

Considering frequent changes happening in the aircraft storage planning, AMOCs, which are issued for a certain time period, might not be applicable anymore and the operators need to apply for another AMOC at a later date.

Furthermore A-Frame Hollow Locating Pins installed on an aircraft in storage are less stressed than on an operating aircraft.

In this context and to relieve the operators LHT would like to kindly ask for a ferry flight for affected aircraft in storage. Considering a possible diverted landing (for whatever reasons) the suggested ferry flight should include 2 flight cycles so that the aircraft is allowed to continue its flight back to its home base before the A-Frame Hollow Locating Pin Replacement has to be performed.

### **EASA response:**

**Comment agreed. The Final AD has been amended to include a Note accordingly.**

