



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 17-012

**[Published on 24 January 2017 and officially closed for comments on 21 February 2017]**

**Commenter 1: Lufthansa Technik – Sarah Bender – 20/02/2017**

### Comment # 1

As per our understanding, Airbus has issued SB A330-53-3215 Revision 02 and SB A340-53-4215 Revision 02 to expand the effectivity to post-mod 55792 aircraft. In the AD section “Reason”, it is stated that SBs in Revisions 01 have been issued to expand the effectivity. This should be corrected.

QUOTE - These analyses demonstrated that post-mod 55792 aeroplanes must follow the same maintenance program as aeroplanes in post-mod 55306 and pre-mod 55792 configuration. Consequently, Airbus published SB A330-53-3215 Revision 01 and SB A340-53-4215 Revision 01 to expand the Effectivity accordingly. - UNQUOTE

### EASA response:

**Comment agreed. The Final AD has been amended accordingly.**

**Commenter 2: Cathay Pacific – Hyphen Choi – 21/02/2017**

### Comment # 2

The inspection SB's require the operators to upload the inspection report to AirbusWorld. This instruction is put under the RC (Required for Compliance) paragraph. However, the reporting has nothing to do with the airworthiness and is not related to compliance (PAD has no reporting requirement). As such, EASA please put a remark in the AD to explicitly mention the SB reporting is not related to AD compliance requirement.

### EASA response:

**Comment understood, but not agreed. The purpose of an AD is to specify what (e.g. certain SB instructions) is required, not what is not required. Since the AD, as proposed, does not include any references to parts of the SB that are marked 'RC' (or not), these references in the SB are (at this**



*time) not relevant for AD compliance. In case an AD requires reporting, the AD must specify that explicitly. If such a requirement is not contained in the AD, following those SB instructions is at the operators discretion. No changes have been made to the Final AD in response to this comment.*

