



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-021

[Published on 13 February 2018 and republished as PAD 18-021R1 on 20 February 2018]

Commenter 1: Rebecca Valkyser – The Flying Bulls GmbH – 13/02/2018

Comment # 1

Just a short question regarding the attached AD: Why within 7 months and not before 31.10.2018 like in the Airbus ASB?

EASA response: According to EASA AD writing instructions “citing a calendar date is not usually an appropriate method of specifying a grace period”. Please refer to EASA AD writing instructions, [WI.CAP.00002](#), section 3.16.17, for more details.

To be noted that the proposed compliance time is “Within 7 months after the effective date of this AD”. Considering the consultation period (until 13/03/2018), some days required to prepare the final AD, and that an AD is usually effective 14 days after publication, the AD compliance time will be most likely not before 31/10/2018.

No changes have been made to the revised PAD in response to this comment.

Commenter 2: Company name – N/A – Ammar Kiwan – 27/01/2018

Comment # 2

One observation on the compliance time (Within 7 months ...).

Could the AD follow the compliance time of the ASB EC135-67A-032: 31 OCT 2018.

EASA response: See EASA answer to Comment #1.

No changes have been made to the revised PAD in response to this comment.

