



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-023

[Published on 14 February 2018 and officially closed for comments on 14 March 2018]

Commenter 1: Lufthansa Technik AG – Olivier Martin – 13/03/2018

Comment # 1

The content of this PAD is well understood and the three applicable Airbus Service Bulletins are known from Lufthansa.

We would like to point out that the workload necessary to embody the modifications from the SBs is significantly higher than the estimation given by Airbus. This is especially true for the modification in the Belly Fairing from SB A380-36-8026. This kind of modification requires a long ground time which is only compatible with C-Checks.

Consequently, with regards to the current operation planning for the fleet of 14 A380 from Lufthansa, we see as very challenging the delay of 24 months after the effective date of this AD for a full embodiment of the SB modifications.

We would suggest extending this time frame of 12 months, if it is compliant with your safety analysis, in order to propose an embodiment planning which will not impact the normal operations.

EASA response:

Comment understood, partially agreed. The risk assessment determined compliance at 36 months from SB issue date, which resulted in an ultimate deadline of 31 May 2020. Instead of extending the compliance time, as as the commenter requests, beyond the 24 months specified in the PAD, EASA have decided to defer the effective date until 01 June 2018.

The Final AD has been amended accordingly.

