



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-073

**[Published on 23 May 2018 and officially closed for comments on 20 June 2018]**

**Commenter 1: Lufthansa Technik AG – John Donegan – 24/05/2018**

### **Comment # 1**

Following receipt of PAD 18-073, kindly note the following comment for your consideration:

For requirement (1) Inspection and (2) Additional Work, it is requested that the compliance time counter be amended to 72 months and 108 months since entry-into-service and not since first flight. The 72-month and 108-month limit agreed with Airbus is aimed at alignment with standard operator maintenance programme schedules. However, for calendar time based tasks, most operator's maintenance programme are set up from EIS, not first flight. Significant planning burden has been experienced on aircraft due to the earlier requirements listed in EASA AD 2015-0212, which were misaligned by several weeks with our layover schedule. „Date of original transfer of title“ may be the more correct term, rather than entry-into-service. Such an amendment was already technically justified by Airbus (ASAC 80449619/007/2018) and EASA (AMOC 10065425) for an individual case. Therefore, we would appreciate support on this matter for the general fleet of all affected aircraft.

### **EASA response:**

***Comment not agreed. The entry into service of an aeroplane cannot systematically be retrieved, certainly for aeroplanes (e.g. leasing) that frequently change from one operator to another. As for an aeroplane first flight, this date is certainly unique and, if it is not known, can be obtained by directly contacting Airbus.***

***No changes have been made to the Final AD in response to of this comment.***

