



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-074

[Published on 28 May 2018 and officially closed for comments on 11 June 2018]

Commenter 1: Fiji Airways – Navneet Sharma – 29/05/2018

Comment # 1

With regards to subject PAD, please confirm if credit will be given to operators who have completed the inspection as per R0 of applicable SB, before the AD is published?

EASA response:

Comment understood. For any Service Bulletin required by an AD, action(s) accomplished before the effective date of the AD in accordance with that SB is automatically given credit as the 'Required Action(s) and Compliance Time(s)' section starts with 'Required as indicated, unless accomplished previously:'

No changes have been made to the final AD in response to this comment.

Commenter 2: Lufthansa Technik – Maximilian Pitzner – 07/06/2018

Comment # 2

In para. 7 it says that “Within 30 days after each inspection...report the results (including no findings) to Airbus.” On DLH point of view the time requirement for reporting is too strict.

It is well known that EASA Part M, Subpart C, M.A.305 (a) requires for a reporting system that “each entry shall be made as soon as practicable but in no case more than 30 days after the day of maintenance action.” For DLH the automatic reporting process took up to these 30 days depending on the maintenance station and if the work will be done in line- or heavy-maintenance. With the interval mentioned the inspection will be performed during heavy-maintenance mostly.



However according Airbus the finding rate is anticipated to be remote (ref RIL LR27M18002146) which means that nearly no findings are expected. Thus a general reporting of the inspection results is striving but the necessity for a quick response is on DLH point of view not given. Consequently a reporting until the next repetitive inspection or within 6 month should be sufficient as there are no findings expected. This will give the operators enough time to report the results (including no findings) to Airbus.

EASA response:

Comment not agreed. The expectation is that the amount of findings is very low, but this needs to be confirmed When sufficient reporting is collected and the expectation of very few findings is confirmed, the final AD might be revised to delete the reporting requirements.

No changes have been made to the final AD in response to this comment.

