



## COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-093

[Published on 11 July 2018 and officially closed for comments on 08 August 2018]

### Commenter 1: Lufthansa Technik – Andreas Ott – 07/08/2018

#### Comment # 1

I have reviewed the provided PAD 18-093 and have the following comment concerning one DLH A319 aircraft.

Lufthansa has performed the full ESG modification package at the first A319 aircraft MSN 609. At this time the modification according SB A320-53-1261 was requested for the A319 aircraft as it is requested for A320 aircraft. Due to the reason that Airbus was not in the position to provide the approved/released SB A320-53-1261 revision until ESG Layover of MSN 609, they decided to provide DLH a TA and TD. The provided documents were released to make the SB effective for MSN 609 and to adapt the modification of A319 aircraft required information.

Now the new PAD will be published and there is no paragraph or information that covers this special case. LHT expects a special paragraph that covers the situation we have at MSN 609 or the existing paragraph 3 will be updated by adding an addition wording for example “Except as required by paragraph (4) of this AD, before exceeding 48 000 flight cycles (FC) or 96 000 flight hours (FH), whichever occurs first since aeroplane first flight, modify the aeroplane in accordance with the instructions of the applicable modification SB or as advised by separate Airbus documentation.”.

If this will not be acceptable and the airworthiness office has the opinion that this case is already covered by paragraph 3 with,  
“modify the aeroplane in accordance with the instructions of the applicable modification SB”

LHT expects a revision of SB A320-53-1261 and A320-53-1360 to correct the effectivity of these both SB’s. At the moment SB A320-53-1261 is not applicable for MSN 609 but it has been performed and SB 53-53-1360 is applicable but has not been performed.

Please be informed that instead of Rev.02 as stated at the TA Rev.03 of SB A320-53-1261 has been used for modification of MSN 609.

In case of any additional information will be requested, please do not hesitate to contact me.

#### EASA response:

**Comment noted: Airbus informed that will provide a revised TA to confirm that the technical content of the TA is equivalent to SB A320-53-1360.**

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

