



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-094

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Commenter 1: Air Tahiti – Vincent Leclerc – 17/07/2018

Comment # 1

- A. AD object of PAD 18-094 will supersede AD 2017-0223R1, and states “this AD retains the requirements of EASA AD 2017-0223R1, which is superseded,” but it does not mention those “retained” requirements. Please clarify.
- B. AD 2017-0223R1 mandates to incorporate TLD Revision 15 in approved AMP before 24/11/2018 (within 12 month after its effective date), so subject superseding AD, if effective before 24/11/2018, should consider the case of AMP already updated to incorporate TLD Revision 14 requirement but not yet Revision 15:
- For paragraph (4) Aircraft Maintenance Programme (AMP) Revision: will obsolete TLD Revision 15 incorporation deadline of 24/11/2018 be “retained” from AD 2017-0223R1 (and if so, how?) or, as it seems, will it be replaced by TLD Revision 16 incorporation deadline? Please confirm and, if necessary, clarify.
 - For paragraph (5) Credit: could it mention “... as specified in TLD Revision 14 or 15...” in §1, and “...incorporate the new and more restrictive tasks and limitation, compared to already incorporated TLD Revision (14 or 15), as applicable....” in § 3?

EASA response:

- A. Comment understood. The ‘retained’ requirements are those that remain unchanged, since the previous Rev.15 ATR ALS document (TLD), in the revised (Rev.16) TLD. The AD (§5) also provides credit for those already-implemented tasks, which also confirms they remain required.**
- B. Comment understood, but not agreed. Although it is hypothetically possible that some operators have not yet fully implemented Rev.15 of the TLD, those (unchanged) tasks are already required to be accomplished, by AD 2017-0223 since its effective date. In EASA view, it is the responsibility of the competent authority (State of Registry of the aircraft) to determine whether any additional action(s) must be taken by the operator to comply with the previous requirements of AD 2017-0223R1, once the new AD becomes effective, to avoid any mismatch in required actions. Finally, it should be noted that the required update of the AMP is an ‘administrative’ action only, as §(1) of the AD already requires the on-aircraft actions. How those are managed by the operator (AMP or otherwise) is also subject to approval by the competent authority.**

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



